











China Pesticide Registration

















We prepared this presentation in order to promote better understanding of China Pesticide Registration. Based on our experience, the topics and related information contained within, are specially chosen, to save you time and effort.

27 Feb 2012, Mr. David Wan, CIRS Email: David@cirs-reach.com



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Part I Background

Authorities

Law and Guidance

2011 Reg. Sta. Data

Update and news



Authorities



MOA

The Ministry of Agriculture of the People's Republic of China www.moa.gov.cn



ICAMA

The Institute for the Control of Agrochemicals under the Ministry of Agriculture (ICAMA) www.chinapesticide.gov.cn



Three Main Regulations/Guidance

Regulation on Pesticide Administration (RPA)

The State Council Issued on May 8, 1997 and amended on November 29, 2001

Provisions for the Implementation of the Regulation on Pesticides Administration

Ministry of Agriculture Issued on April 27, 1999 and amended on July 27, 2002

Data Requirement of Pesticide Registration (DRPR)

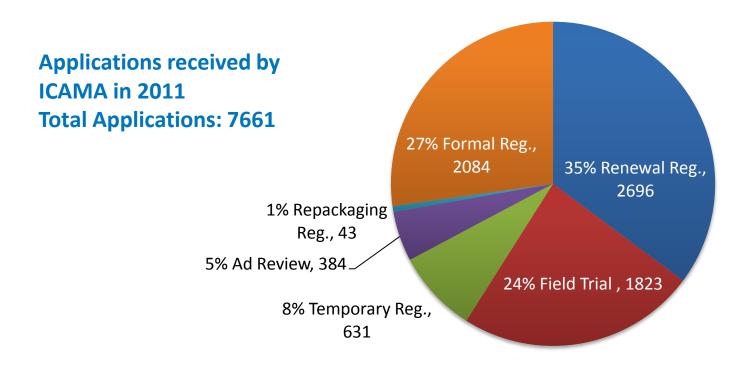
Ministry of Agriculture Issued on April 12, 2001 and revised on December 8, 2007

Relevant Law/Guidance

- ✓ Pesticide Advertisement Inspection Measure
- ✓ Guidance on Pesticide Efficacy Trials
- ✓ Guidance on Pesticide Environment Safety Test and Evaluation
- ✓ Guidance on Pesticide Toxicity Tests
- ✓ Guidance on Pesticide Label and Manual
- √ Guidance on Pesticide Packaging
- ✓ Guidance of Safety Handling on Pesticide Storage and Transportation
- √ Standards on Pesticide Residue
- ✓ Standards on Pesticide Products



Registration Statistical Data (2011)

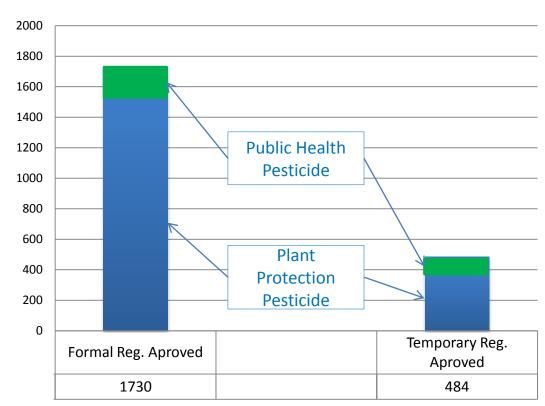


Information source: Overview on pesticide registration and management 2011, **Pesticide Science** and Administration, Vo1. 33, ISSN 1002-5480



Registration Statistical Data (2011)

2214 Certificates issued in 2011



Information source: Overview on pesticide registration and management 2011, **Pesticide Science** and Administration, Vo1. 33, ISSN 1002-5480



Updates and News

- I. Draft Regulation on Pesticide Administration (July 20, 2011)
 - Temporary registration will be cancelled
 - More articles related to imported pesticides are added
- II. Draft Provisions on Data Requirement of Pesticide Registration (April 28, 2011)
 - Reduced data requirements for low risk pesticide
- **III.** MOA Notice 1586 2011;
 - List of banned or restricted high toxicity pesticides



Registration

Scope and Applicants

Registration workflow

Product Analysis

Data Analysis

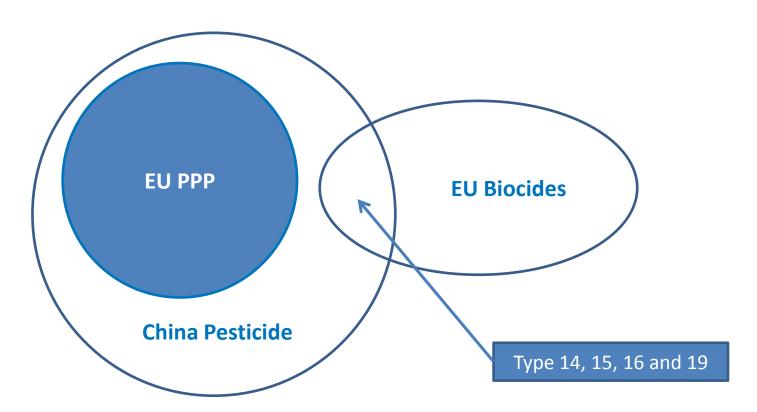


Pesticide Scope

Туре	Instance
To control agriculture/forestry pests	Glyphosate, Abamectin
To control storage pests	Methyl bromide
PGR and IGR	NAA, GA, Diflubenzuron
Agricultural or forestry preservative	Prochloraz
Public health pesticide	Tetramethrin
To control pests harmful to other places	Chlorpyrifos

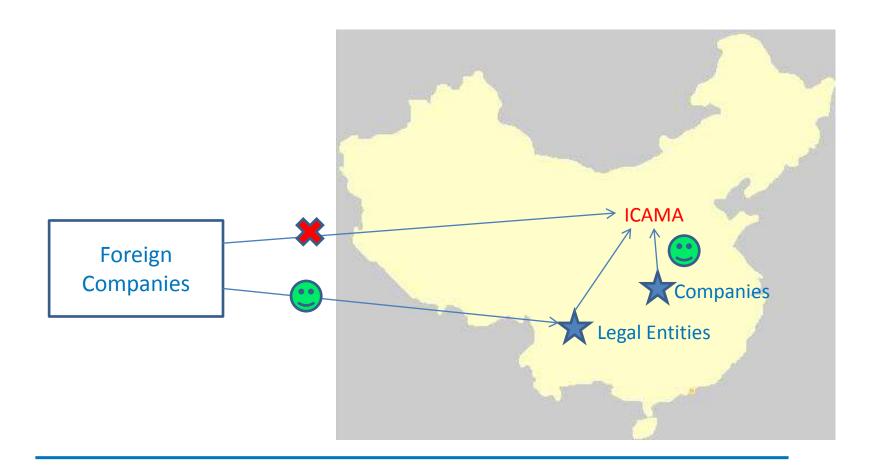


What is the difference between product scope under China Pesticide and EU PPP?





Applicants





Registration Procedures

1	Product Analysis		
2	Data Gap Analysis		
3	Study Performance		
4	Dossier Preparation		
5	Submission and Defense		



Product Analysis

Feasibility Analysis

- 1, Regulated or not Regulated
- 2, How many registration and competitors in China
- 3, Market Potential
- 4, Application in China

Product/Registration Type Analysis

- 1, Generic pesticide or special pesticide
- 2, New Pesticide or Same Pesticide
- 3, Data Requirement
- 4, What data can be exempted



How to find your expected information from ICAMA's website?

Registered number Active ingredients Registered company

Registered Products
Registration process
Label Information
AI
Expired registration
AD overview
Field Trial
Certificate of free sale

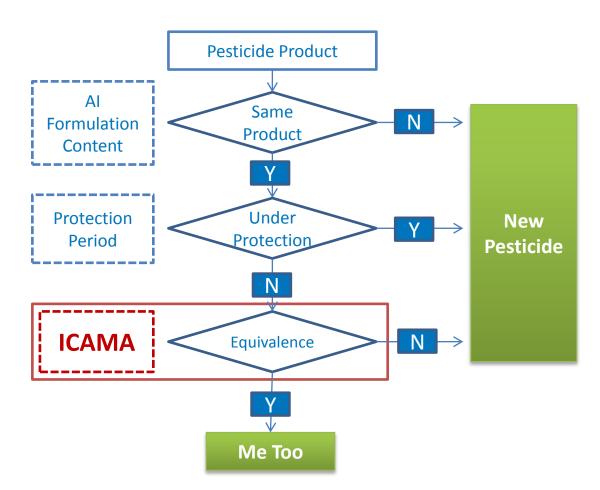


http://www.icama.org.cn/en/



http://www.icama.org.cn

How to determine if a pesticide product can be registered as "Me Too"?





Data Analysis

Purpose:

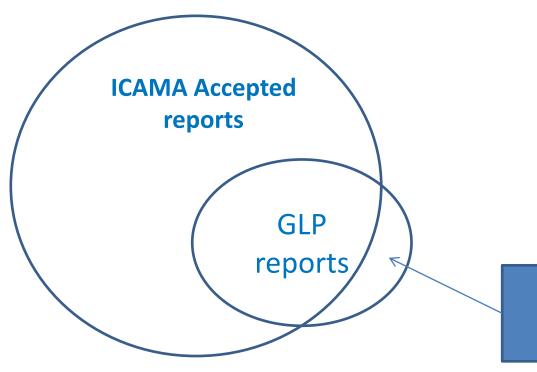
Avoid unnecessary tests and studies

Tasks:

Data Requirements identification
Existing Data Evaluation
Data Gap Identification
Data Collection and Integration Suggestions
Final Assessment



What kinds of study reports can be accepted by ICAMA?



Reports not meet ICAMA's requirements



What Are the Data Requirements for New Formulated Products and New Technical Products?

Formulated Products

✓ Application form accelerate, and real time tests)

✓ Pre-analysis of Mode of action ✓ Six pack test reports

✓ Lab efficacy and safety test report ✓ Residue test reports

✓ Filed efficacy test ports ✓ Ecotoxicity test reports

✓ Certificate of composition of technical ✓ Label

✓ Product standard ✓ MSDS

✓ Storage stability test reports (cool, ✓ Integrated information report



Technical Product

✓ Application form

√ Teratogenic toxicity report

✓ Eco-toxicity test reports

✓ Product Summary

✓ Metabolism in animals

✓ Label

✓ Five batch analysis report

✓ 2years Chronic/carcinogenic ✓ MSDS

✓ Product Standard

toxicity report

✓ Integrated information

✓ Manufacturing process

✓ People exposure data

report

✓ Six Pack Reports

√ Toxicity information of

✓ 90 Days feeding test report

impurities

√ Mutagenicity tests (three)

✓ Neurotoxicity test report

tests reports)

✓ Environmental fate tests

✓ Reproduction toxicity report reports



Further More

Duration and Cost SDS and Label

Practical tips



Duration



Duration and work tasks are based on the completeness of existing data/reports.



New Pesticide, 2-3 years

Work tasks of study performance will be different due to different product types and the necessary tests. For the best situation, the duration of New Registration should be 25 months.

First year	Second year	Third year	



Cost Analysis

- Study Performance Cost 60~ 80%
- Administration Fee. 1-5%
- Manpower Cost. 20-40%





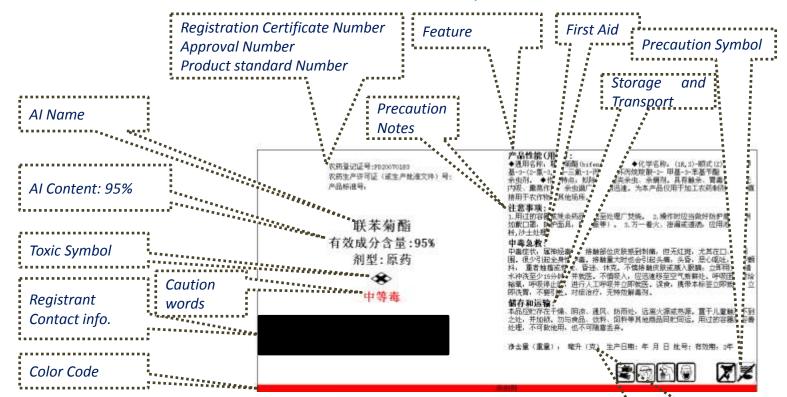
SDS

- ✓ Explanations on Pesticide Safety Data Sheet (MSDS)
- ✓16 titles
- ✓In Chinese



Label – Technical Product

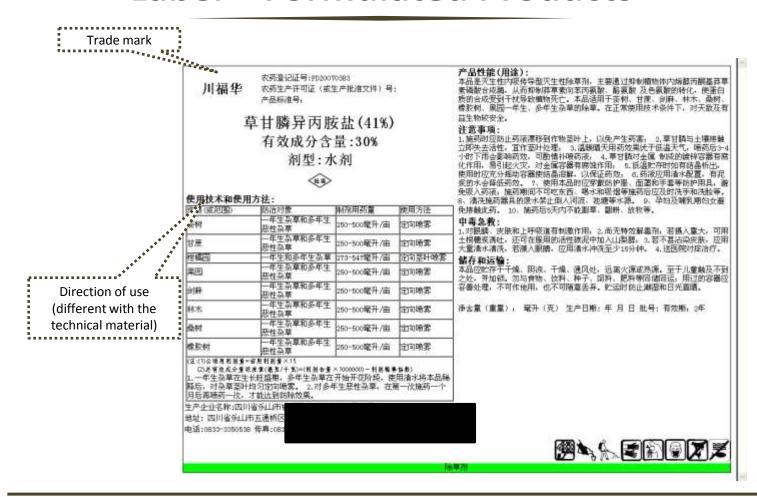
China Pesticide Label must be prepared according to the *Guidance on pesticide label and manual*. The labels are different for technical material and formulated product.



Shelf life and net content



Label – Formulated Products





Practical Tips

Some reasons of Registration Rejection

Not a pesticide

Medical products are not fit for using as pesticide

Mistake in the application form

Notice on the label is not corresponding to the toxicity of the products Nonconforming label

Incorrectly naming of active ingredient

Risk assessment is needed for products with risk potential to environmental safety Lack of toxicity studies reports or metabolism studies reports or environmental fate studies reports or residues studies on the registration crops or others data Mistake or lack of PHI

Residue is out of limits

Mixed formulated products with same mechanism of action

Undefined mechanism of action or field efficacy



Practical Tips

Banned List and Restricted List

Banned List

✓ 23 Pesticide

Restricted List

✓ 19 Pesticide

✓ Some crops applications are restricted

MOA Notice 1586

✓ 15 June, 2011

Notice 1586 list

✓ 22 Pesticides

✓Oct 31, 2011

✓Oct 31, 2013



Banned List				
Arsenic	DDT	ВНС	Sodium fluoroacetate	Silatrane
Diromoethane	Nitrofen	Thiodaqual	Monocrotophos	Ammonium phosphate
Toxaphene	Aldrin	Fluoroacetamide	Methamidophos	Lead
Dibromochlorpropane	Dieldrin	Gliftor	Parathion-methyl	
chlordimeform	Mercurials	Tetramine	parathion	

Omethoate	Thyme	Carbofuran	Fonofos
Dicofol Isofenphos-methyl,		Aldicarb	Isazofos
fenvalerate	Phosfolan-methyl	Ethoprophos	Fenamiphos
Daminozide	Sulfotep	Phosfolan	Fipronil
Terbufos	Demeton	Coumanhos	

22 pesticides listed in the Notice 1586

Fenamiphos	Cadusafos	Coumaphos	Methomyl	Bromomethane
Zinc Phosphide	Fonfos	Methidathion	Ethoprophos	Endosulfan
Posfolan-Methyl	Omethoate	Thimet	Aldicarb	
Calcium Phosphid	Terbufos	Isofenphos-Methyl	Aluminium Phosphide	
Magnesium Phosphide	Sulfotep	Carbofuran	Isocarbophos	



Workshop

Subject:

1st Workshop on Pesticide Registration in EU and USA – Hangzhou, China

Time:

10-11 April 2012

Address:

Liutong Hotel, Hangzhou, China

Presenter:

Louis Wyness, Director, Technology Sciences Group Europe (TSGE) Robert Stewart, Ph.D., Vice President, Technology Sciences Group Inc. (TSG) Ema Huang, Senior Pesticide Registration Specialist, CIRS China



Thanks for Your Attention































FOR ANY QUERIES/ QUESTIONS, PLEASE DO NOT HESITATE TO CONTACT: MR. DAVID WAN. Email: david@cirs-reach.com