国际食品法典和中国的农药残留标准体系发展

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报告内容提纲

- 一、国内外农药管理主要手段
- 二、FAO农药风险评估方法
- 三、中国农药残留标准体系建设发展

小结与建议

• **2011**年主题:粮食<mark>价格</mark>——走出危机,走向稳定。农业可持续发展

• 2012年世界食品目的主题: 农业协作: key to feeding the world.

• 2013: 可持续农业系统确保安全与营养

• 2014: 家庭农业 供养世界 关爱地球

• 2015: 社会保护与农业:打破农村贫困恶性循环

年份	谷物需求(亿吨)	人口(亿)		◎
1990	20	53	2050年的世界: 预测	
1995	19	57		34亿吨 (+ 46 %)
2000	21	61		921Z (+ 33 %)
2005	23	65	谷物需求	(+ 33%)
2010	22	69	XII)	

KEY TO FEEDING THE WORLD

全球每年浪费大约13亿吨食物,而发达国家和地区每年浪费大约3亿吨食物,够养活全球大约8.7亿饥饿人群;

全球肥胖人群超过饥饿人群2个亿。

- 现代农业的发展离不开农业化学品
- 农药的研发: 朝着低风险方向
- 农药的管理手段: 登记前、登记注 册、登记后、使用、使用后
- 正确认识农药的风险: 风险分析的原则、加强风险交流

2008 FDA Frequency of Occurrence of Pesticide Residues in Total Diet Study for Foods

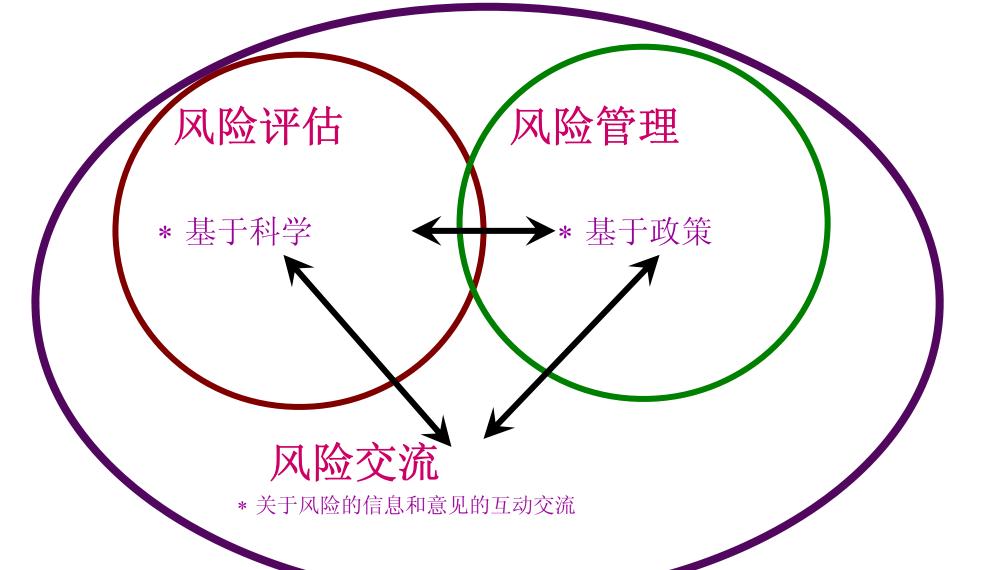
Pesticide ²		Occurrence,	Range,	
resticide -	Total No. of Findings	%	ppm	
DDT	204	22	0.0001-0.090	
Malathion	112	12	0.0003-0.031	
Dieldrin	98	11	0.0001-0.011	
Endosulfan	97	11	0.0001-0.0645	
Quintozene	88	10	0.0001-0.0217	
Chlorpyrifos methyl	86	9	0.0001-0.025	
Hexachlorobenzene	73	8	0.0001-0.001	
Chlorpropham	66	7	0.0005-4.901	
Chlorpyrifos	64	7	0.0002-0.063	
Permethrin	44	5	0.0003-1.786	
Thiabendazole ³	37	4	0.001-0.435	
Carbaryl ⁴	27	3	0.0001-0.104	
Phenylphenol, o-	23	3	0.003-0.475	
Pirimiphos methyl	23	3	0.0001-0.363	
Cypermethrin	19	2	0.0004-0.827	
Toxaphene	16	2	0.003-0.054	
Benomyl ³	15	2	0.010-0.266	
Dicloran	15	2	0.0004-0.142	
Bifenthrin	14	2	0.001-0.056	
Heptachlor	14	2	0.0001-0.0005	

一、国内外农药残留管理

风险分析原则: 风险评估、风险管理、风险交流

风险预防、风险监测、风险处置

风险分析框架



风险预防、风险监测

农药产品标准(Specification)
-相同产品认定(equivalence determination)

登记注册(药效、毒性、产品组成、理化性质、环境影响、有益生物影响等)

农产品、环境中最大残留限量建立、风险评估

农产品市场监测、总膳食摄入研究TDS等

农药风险评估的核心内容

- 1)毒理学评估:对一个农药的固有毒性或潜在危害的评估。即农药对人的危害作用。
- 2) 摄入评估:对消费者摄入可能性的评估。是人通过什么途径摄入(或暴露)和摄入数量。
- 3)风险表征(特性描述):对人潜在风险的评定。是研究摄入量与毒性之间的关系。是综合毒性和摄入量数据来预测对人体健康不良影响的可能性。

美国 EPA 农药登记试验指南

OPPTS Harmonized Test Guidelines - Master List

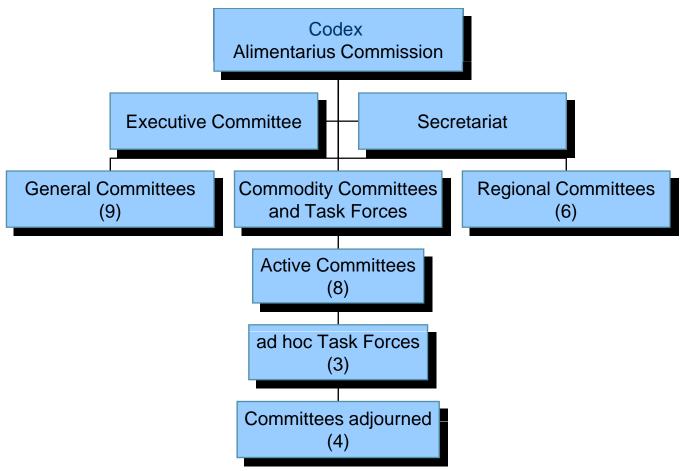
Last Updated January 29, 2010

The OPPTS harmonized guidelines are organized in the following series:

Series No.	Series Name	Docket ID No.	Last Changed
810	Product Performance Test Guidelines	EPA-HQ-OPPT-2009-0150	Aug-2010
830	Product Properties Test Guidelines	EPA-HQ-OPPT-2009-0151	Nov-2008
835	Fate, Transport and Transformation Test Guidelines	EPA-HQ-OPPT-2009-0152	Nov-2008
840	Spray Drift Test Guidelines	EPA-HQ-OPPT-2009-0153	Mar-1998
850	Ecological Effects Test Guidelines	EPA-HQ-OPPT-2009-0154	Арг-1996
860	Residue Chemistry Test Guidelines	EPA-HQ-OPPT-2009-0155	Nov-2008
870	Health Effects Test Guidelines	EPA-HQ-OPPT-2009-0156	Mar-2003
875	Occupational and Residential Exposure Test Guidelines	EPA-HQ-OPPT-2009-0157	Feb-1996
880	Biochemicals Test Guidelines	EPA-HQ-OPPT-2009-0158	Feb-1996
885	Microbial Pesticide Test Guidelines	EPA-HQ-OPPT-2009-0159	Feb-1996
890	Endocrine Distruptor Screening Program Test Guidelines	EPA-HQ-OPPT-2009-0576	Aug-2009

CODEX 国际食品法典组织





General Subject Committees

- General Principles (France)
- Food Additives (China)
- Contaminants in Foods (Netherlands)
- Food Labelling (Canada)
- Food Hygiene (USA)
- Pesticide Residues (China)
- Methods of Analysis & Sampling (Hungary)

- Food Import and Export Inspection and Certification Systems (Australia)
- Residues of Veterinary Drugs in Foods (USA)
- Nutrition & Foods for Special Dietary Uses (Germany)

国际农药残留风险评估与管理机构



- JMPS: pesticide specification (new procedure), CIPAC: methods 农药产品质量标准
- JMPR & CCPR: 残留限量标准的推荐、评估与审议
 - GL on method performance criteria (ongoing eWG)
 - Risk analysis principle (46th CCPR)
 - MRL settings: minor crop, crop grouping, representative crop, mrl calculator.....
- CCMAS 取样与分析方法委员会
 - GL on avoiding disrupts (CAC GL 70: **GUIDELINES FOR SETTLING DISPUTES OVER ANALYTICAL (TEST) RESULTS**)
- JMPM: Code of conduct GLs, training, 农药的管理

Codex 法典系统的成果

指南 (GL)

标准(农兽药限量CXLs、商品标准、添加剂;标签、污染物)

建议 (Recommendations)

www.codexalimentarius.org

Codex 标准的通过程序

Step 1 CCPR农药优先列表工作组提出农药评估优先列表

Step 2 由JMPR专家组对农药残留进行初次评估,提出ADI值、MRLs建议草案

Step 3 首次征求各国政府对MRLs建议草案的意见

Step 4 根据收集到的各国反馈意见,CCPR大会对MRLs建议草案进行首次讨论

Step 5 根据CCPR大会的结果,CAC大会对MRLs草案进行讨论 Step 6 二次征求各国政府对MRLs草案的意见 Step 7 根据收集到的各国反馈意见,CCPR大会再次对MRLs草案进行讨论

Step 8:

CAC大会采纳MRLs草案,作为Codex MRL (CXL)

Step 5/8:

MRLs建议草案如果在第5步没有反对意见,则跳过第6、7步,直接在CAC大会上通过。

Codex指南等文件的通过程序

按照 Codex的程序文件指南进行, Procedure Mannual

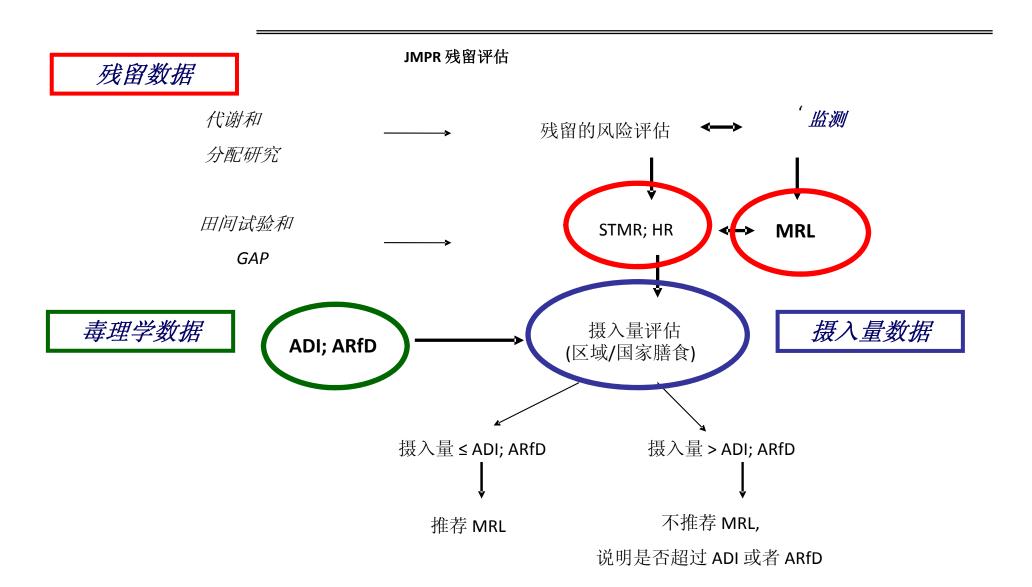
- 1.Proposal 阶段
- 2.如必要,由WG或达成意向的国家形成Discussion paper
- 3.CCPR等起草形成 Working document, 提交CAC 大会审议
- 4.CAC 批准 working document
- 5.开始执行working document
- 6.CCPR 成立WG, 起草 draft GL
- 7.WG 讨论, CCPR 大会讨论 (step 3 4, 5, 6, 7, 8, 5/8)
- 8.提交CAC 讨论
- 9.发布 GL

CCPR: 38-48th China Chair Country

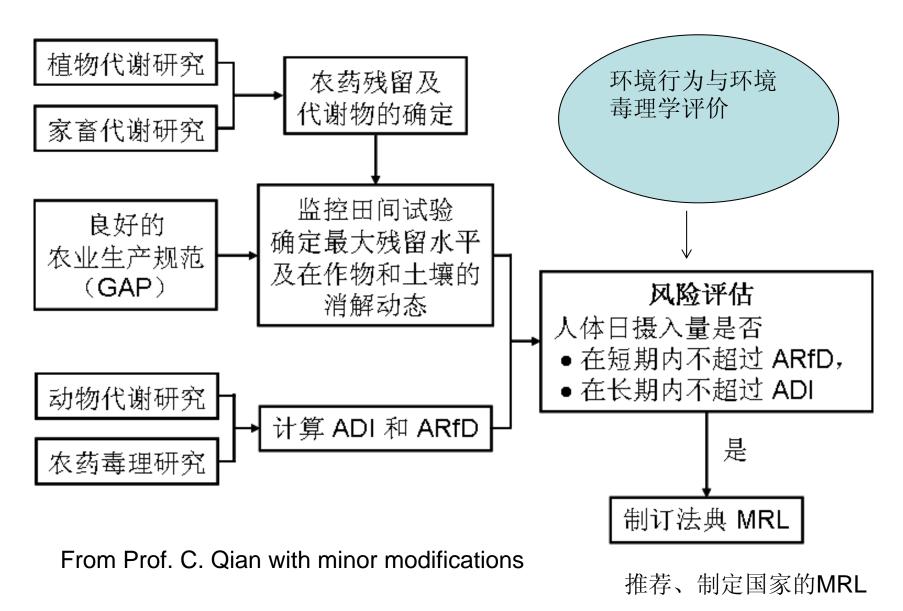


performance criteria for methods of analysis for MRLs for pesticides.: STEP 5

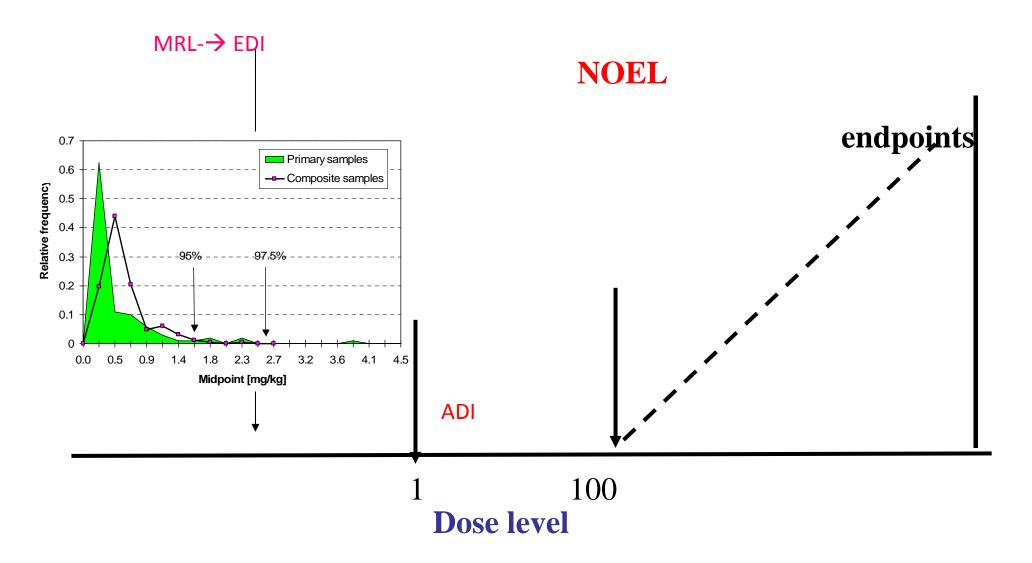
农药MRL推荐的风险评估



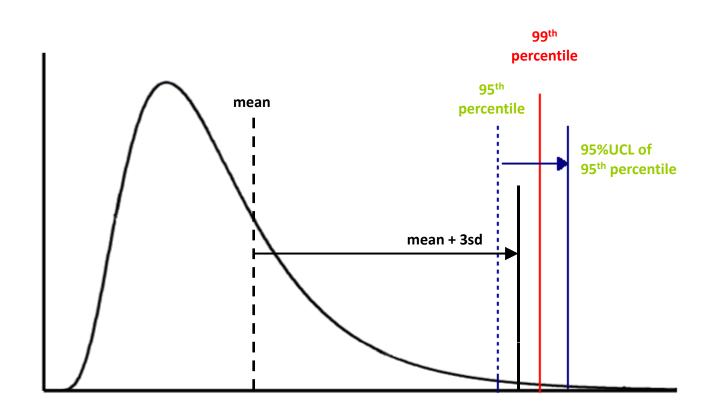
MRL 制定流程



MRL: not a safe criteria; rather than GAP check and trade standard



Percentiles frequently used in MRL calculations



MRLs标准制定趋势

- 依据充分,标准和规范数量庞大,指标具体, 协调一致
- 指导文件和准则,如农药在植物中的代谢准则、轮作作物 田间试验准则、残留定义准则、农药残留试验准则、作物 田间残留试验模版和家畜饲料表等、MRL计算器等
- 强调风险评估,并在风险评估中突出了对弱势群体如儿童、育龄期妇女的保护。
- 精细进行膳食摄入评估
- 风险管理专家优先考虑对健康和环境影响
- 技术性贸易措施协定(TBT协定)和卫生与植物卫生措施协定(SPS协定) 通报与互相评议

二、 FAO 风险评估方法

• 1. LONG-TERM DIETARY INTAKE——长期膳食摄入

International estimated daily intakes (IEDIs) are derived only where STMRs or STMR-Ps are used in the calculation. Theoretical maximum daily intakes (TMDIs) use MRLs in the calculation.

 $IEDI = \sum (STMR_i \times F_i)$

 $TMDI = \sum (MRL_i \times F_i)$

where

STMR_i (or STMR-P_i) is

STMR (or STMR-P) for food commodity i

MRL_i is

MRL for food commodity i

F_i is

GEMS/Food regional consumption of food commodity i

2. SHORT-TERM DIETARY

气門膳食摄入

Case 1

The residue in a composite sample (raw or processed) reflects the residue level in a meal-sized portion of the commodity (unit weight, U, is below 0.025 kg). Case 1 also applies to meat, liver, kidney, edible offal, and eggs, and for grains, oil seed, and pulse commodities when the estimates are based on post-harvest use of the pesticide.

> IESTI = $LP \times (HR \text{ or } HR-P)$

Case 2

The meal-sized portion, such as a single fruit or vegetable unit might have a higher residue than the composite (whole fruit or vegetable unit weight, U, is above 0.025 kg).

Case 2a

Unit edible weight of raw commodity (U_e) is less than large portion weight.

IESTI = $U_e \times (HR \text{ or } HR-P) \times v + (LP-U_e) \times (HR \text{ or } HR-P)$

The Case 2a formula is based on the assumption that the first unit contains residues at the $[HR \times v]$ level and the next ones contain residues at the HR level, which represents the residue in the composite from the same lot as the first one.

Case 2b

Unit edible weight of raw commodity, U_e, exceeds large portion weight.

IESTI = $LP \times (HR \text{ or } HR-P) \times v$

bw

The Case 2b formula is based on the assumption that there is only one consumed unit and it contains residues at the [HR \times v] level.

Case 3

Case 3 is for those processed commodities where due to bulking or blending the STMR-P represents the likely highest residue. Case 3 also applies to milk, grains, oil seeds, and pulses for which estimates are based on the pre-harvest use of the pesticide.

> IESTI = $LP \times STMR-P$

> > bw

LP: Highest large portion reported (97.5th percentile of eaters), in kg food per day

HR: Highest residue in composite sample of edible portion found in the supervised trials used for

estimating the maximum residue level, in mg/kg

HR-P: Highest residue in a processed commodity, in mg/kg, calculated by multiplying the highest

residue in the raw commodity by the processing factor U Unit weight of the whole commodity (as defined for MRL setting, including inedible parts)

U.: Unit weight of the edible portion, in kg, median value provided by the country where the trials

which gave the highest residue were carried out

Variability factor - the factor applied to the composite residue to estimate the residue level in a

high-residue unit; defined as the residue level in the 97.5th percentile unit divided by the mean

residue level for the lot.

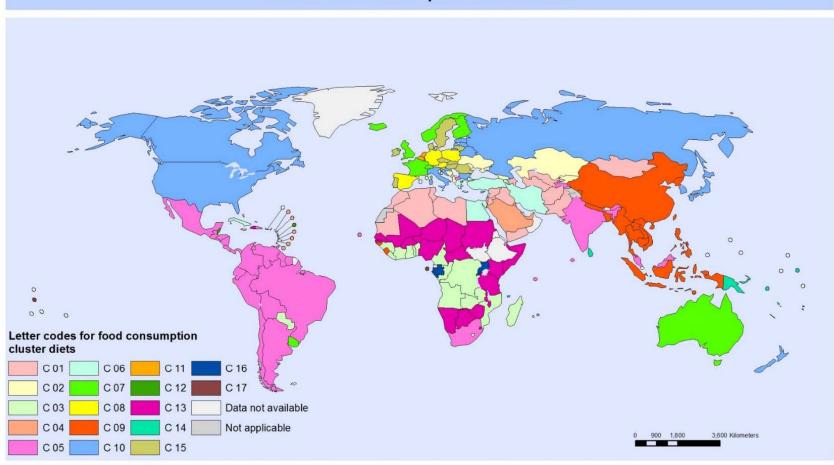
STMR: Supervised trials median residue, in mg/kg

Supervised trials median residue in processed commodity, in mg/kg STMR-P:

3. GEMS/Food Consumption Cluster Diets

时 **~** 十百) 小口 丑头

GEMS/Food Consumption Cluster Diets



The boundaries and names shown and the designations used on this map do not imply the expression of any opinion whatsoever on the part of the World Health Organization concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries. Dotted and dashed lines on maps represent approximate border lines for which there may not yet be full agreement.

Data Source: World Health Organization Map Production: Public Health Information and Geographic Information Systems (GIS) World Health Organization



IESTI EVENT GENEVA SEPT 2015

Conclusions workshop 8 + 9 sept.

IESTI EVENT GENEVA SEPT 2015: WORKSHOP

Proposal for new IESTI equations

New IESTI equation replacing case 1 and case 3 of the current IESTI equation:

$$IESTI = LP_{bw} \times MRL \times CF \times PF$$

New IESTI equation replacing case 2a and case 2b of the current IESTI equation:

$$IESTI = LP_{bw} \times MRL \times \nu \times CF \times PF$$



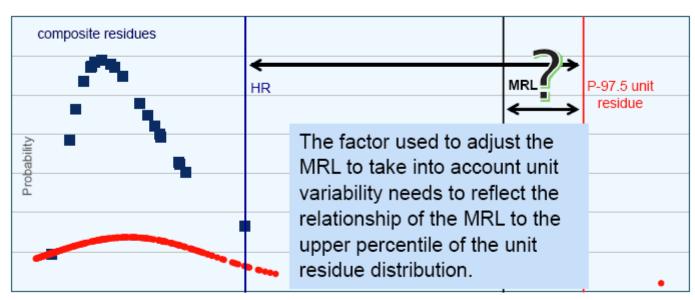
Crop Life International: 不同意见 The Variability Factor

Is V=3 appropriate when used with the MRL?

IESTI - case 2a and 2b Acute Exp (mg/kg-bw/day) = MRL x V x LP

The variability factor is an upper percentile estimate of the ratio between the pesticide residue in the unit samples and the residue in the composite samples

V = <u>97.5th percentile Unit Residue</u>
Composite Residue



Residue Level

Preliminary calculations demonstrate that a more appropriate variability factor <<3 could be derived for use with the MRL</p>

三、中国农药残留标准体系发展

农药残留限量标准态势

- CAC: >3200 mrls, 涉及农药156种; 周期性评估?
- 欧盟: MRL Regulation 396; 农药产品登记Regulation 1107(逐步替代 91 414 directive)
 - 315种食品和农产品(原有190种和新增125种)中共约70000个MRLs;"一律标准"(0.01mg/kg),LOQ*;
- 日本: positive list system; "一律标准" (0.01mg/kg); 67000多个 MRL
- 美国: "风险杯(risk cup)"原则,涉及380种农药约11000项,CFR第40章第180节; IR-4: minor cropmrl; 一律标准 0.1
- 中国: 目标10000; 一律标准: ?不得检出?
- 韩国、台湾、中国香港

我国农兽药残留标准体系概况

- 2014年,农业部与国家卫生计生委联合发布了食品安全国家标准《食品中农药最大残留限量》(GB2763-2014),规定了387种农药在284种(类)食品中3650项限量指标。该标准规定的残留限量,覆盖了蔬菜、水果、谷物、油料和油脂、糖料、饮料类、调味料、坚果、食用菌、哺乳动物肉类、蛋类、禽内脏和肉类等12大类作物或产品。除常规的谷物、蔬菜、水果外,包含了果汁、果脯、干制水果等初级加工产品的农残限量指标。
- 我国已对135种兽药做出了禁限规定,其中有兽药残留限量规定的兽药94种,涉及限量值1548个,允许使用不得检出的兽药9种,禁止使用的兽药32种;建立了兽药残留检测方法标准519项。
- 2012-2016 5000项计划? 2020年 10000项目

农药残留超标的主要原因

- 1 滥用或随意使用农药,违反标签操作
- 2 随意扩大作物使用范围
- 3"小作物"问题: 登记的农药品种太少
- 4农药产品质量问题 (伪劣农药、掺假...)
- 5. 其他原因: 进出口农产品或食品? 进口限量? 标准体系? 取样与检测的纷争......

• 欧盟农药残留监测结果概述

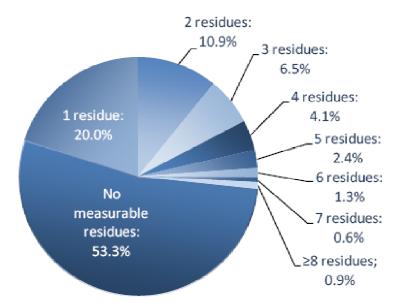


Figure 4.5.4-1: Number of residues found in individual surveillance samples from the national and EU coordinated pesticide monitoring programmes 2008.

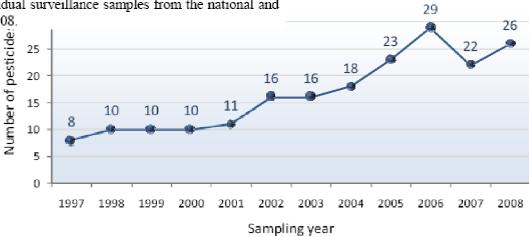
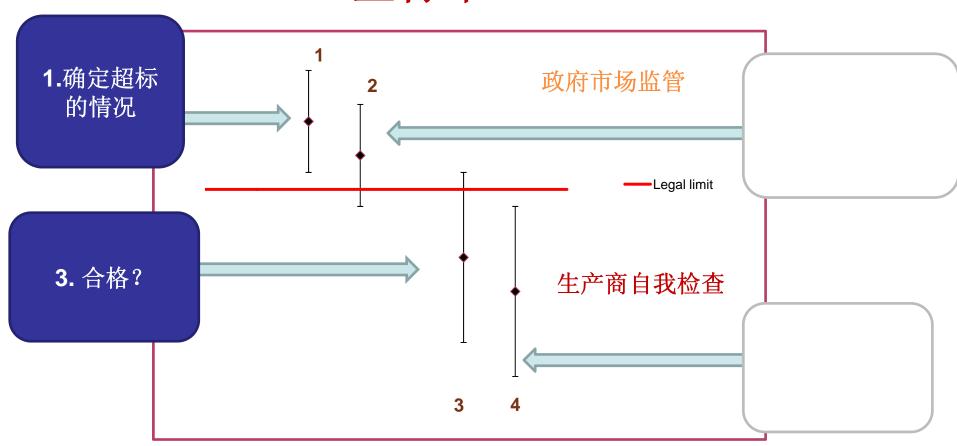


Figure 4.5.4-2: Highest reported number of different pesticides in one sample from 1997 to 2008 in fruit, vegetables and cereals.

如何检测和判定是否符合质量安全标准?



限量标准制定与精确膳食摄入评估

- 代表作物与作物分组建立组限量
- 小作物上农药残留规律与药效/药害、mrl研究
- 食品加工过程中农药残留特性研究
- 农药生物标志物研究: 来源与精确评价、职业暴露等
- 奶制品、肉制品中农药残留缺少基础性研究
- 进口限量标准问题
- 一律标准问题

科技部重大项目"化肥农药减量使用"项目

"化肥农减增综技研重专"目学料药施效合术发点项项目



总体目标

• 通过化肥农药高效利用机理与投入基准、肥料农药技术创新与装备研发、化肥农药减施技术集成研究,构建化肥农药减施与高效利用的理论、方法和技术体系,到2025年,在保证主要农作物稳产的基础上,提出化学肥料减施20%、化学农药减施30%,并提出节本提质增效的综合技术模式,培训农技推广人员50万人次,培训新型职业农民500万人次,为我国农业"转方式、调结构",保障我国粮食安全和生态安全提供科技支撑。

总结与建议

• 农药的使用必不可少, 朝低风险方面发展、减量使用、生态农业发展

• 国际食品法典: 科学的风险评估、风险分析框架下的风险管理建议、加强风险交流

- 中国农药残留标准:
 - 国家重视、CAC 转化与宝贵经验、国际参与
 - 发展迅速、逐步完善、任重道远

谢谢!

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