



Japan's Maximum Residue Level Policy

Stephen Wixom

Agricultural Attaché

U.S. Embassy, Tokyo

June 3, 2009

The Positive List :

- **814** agricultural chemicals with specific MRLs for 200+ food classifications
- 65 exempt agricultural chemicals
- 19 banned substances



Agrochemicals Not Included in the Positive List—Default Tolerances

- Anything else falls under the default tolerance of 0.01 ppm.
- This is the maximum residue limit for chemicals and commodities that have no official or provisional MRLs.

MRL Testing

- MHLW quarantine officials “generally” monitor 5% of imports for chemical residues.
- Japan announces a general outline for the coming JFY at the end of previous JFY of what it will be testing for and how many tests will be conducted.

What you can do to prevent a violation?

Japan Food Chemical Research Foundation

<http://www.ffcr.or.jp/>

MHLW

<http://www.mhlw.go.jp/english/topics/foodsafety/index.html>



MRL Violations So Far

U.S. Violations in FY2009:

- 1) Tea – Triazophos
- 2) Celery – Boscalid (6 violations)
- 3) Broccoli – Flonicamid

Examples of import violations from other countries:

China – Many violations on seafood and fresh vegetables

Vietnam – Many seafood products

Canada – Kidney Beans

France – Fresh cherries



Domestic Violations

Date	Crop	Place of production	Chemical Name	Detected value (ppm)	JP MRL
2008/10/16	Pak Choi (Brassica)	Chiba	Metaldehyde	granule	not registered
2008/10/28	Celery	Nagano	Indoxacarb		
2008/11/8	Spinach	Chiba	Prothiofos	2.6, 1.6	0.01
2008/11/22	Komatsuna	Osaka	DIAZINON	0.38	0.1
2008/12/13	Spinach	Shizuoka	Etofenprix and Clothianidin	12.3 (etofenprix) and 0.06 (clothianidin)	2 (etofenprix) and 0.02 (clothianidin)
2009/1/31	Garland chrysanthemum (edible chrysanthemum)	Fukushima	trifluralin (herbicide)	0.26	0.05

How does Japan treat import violations?

- If residues of chemicals are found on food that are above the listed MRL, the shipment cannot be sold in Japan.
- Following a single violation MHLW can increase monitoring for that product for the entire industry.
- If there are two or more violations, MHLW can test and hold 100% of shipments.

Diagram of MHLW's Policy for Sanctions on MRL Violations

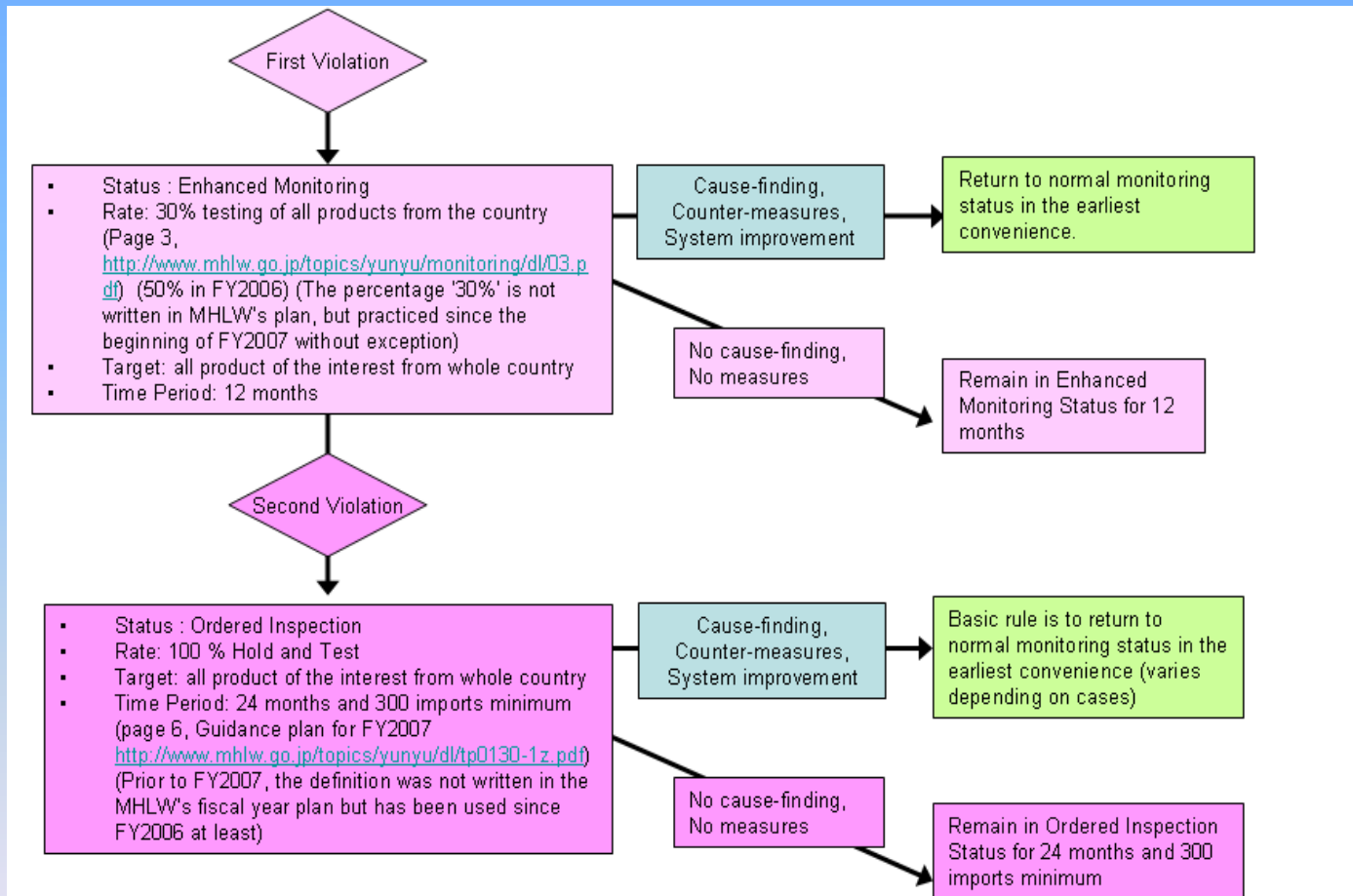


Figure 1. Violation treatment to imported produce under Positive List System by MHLW (as of August 2007)

What can you do following a violation?

- MHLW may limit sanctions if the company with the violation is willing to demonstrate “due diligence”.
- This includes demonstrating: 1) cause-finding; 2) corrective countermeasures; 3) action plan to prevent further occurrences



MRLs and so called Additives

- Post harvest fungicides are classified as food additives
- Substances that already have an MRL for pre-harvest use must go through the additive approval process for use post harvest
- Redundancies in the approval process and other inefficiencies can create significant gaps between U.S. and Japanese approvals

Related Websites

- Ministry of Health, Labor, and Welfare –Positive List:
<http://www.mhlw.go.jp/english/topics/foodsafety/positivelist060228/index.html>
- Food Safety Violations:
<http://www.mhlw.go.jp/english/topics/importedfoods/index.html>
- Maximum Residue Limits Database:
<http://www.m5.ws001.squarestart.ne.jp/foundation/search.html>

USDA/FAS Resources Available on the Positive List

- USDA MRL Database:
<http://www.fas.usda.gov/http/mrl.asp>
- GAIN Reports:
<http://www.fas.usda.gov/gainfiles/200801/146293402.doc>
- FAS/Tokyo Website:
<http://www.usdajapan.org/>
- Contact: Stephen.Wixom@fas.usda.gov;
Suguru.Sato@fas.usda.gov