

Introduction of China's Fertilizer Regulations and Risk Management

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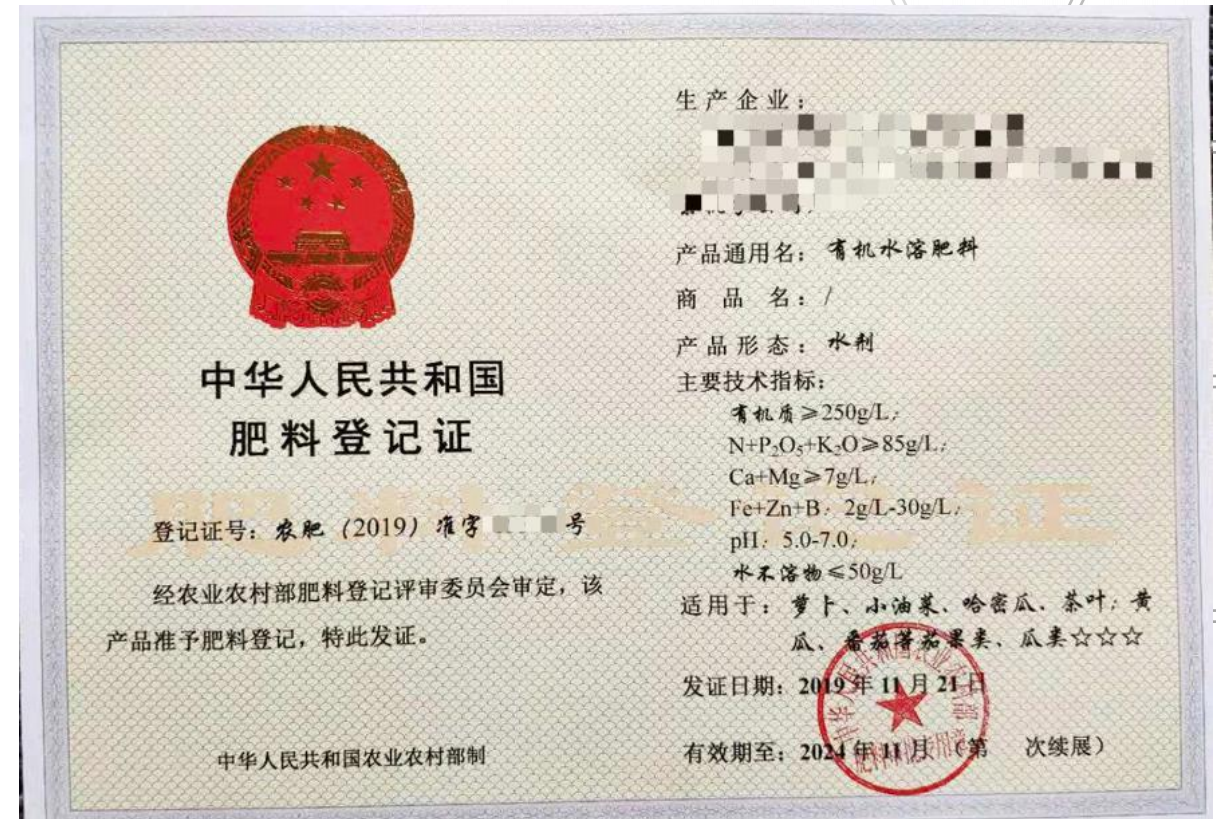
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Fertilizer Management in China

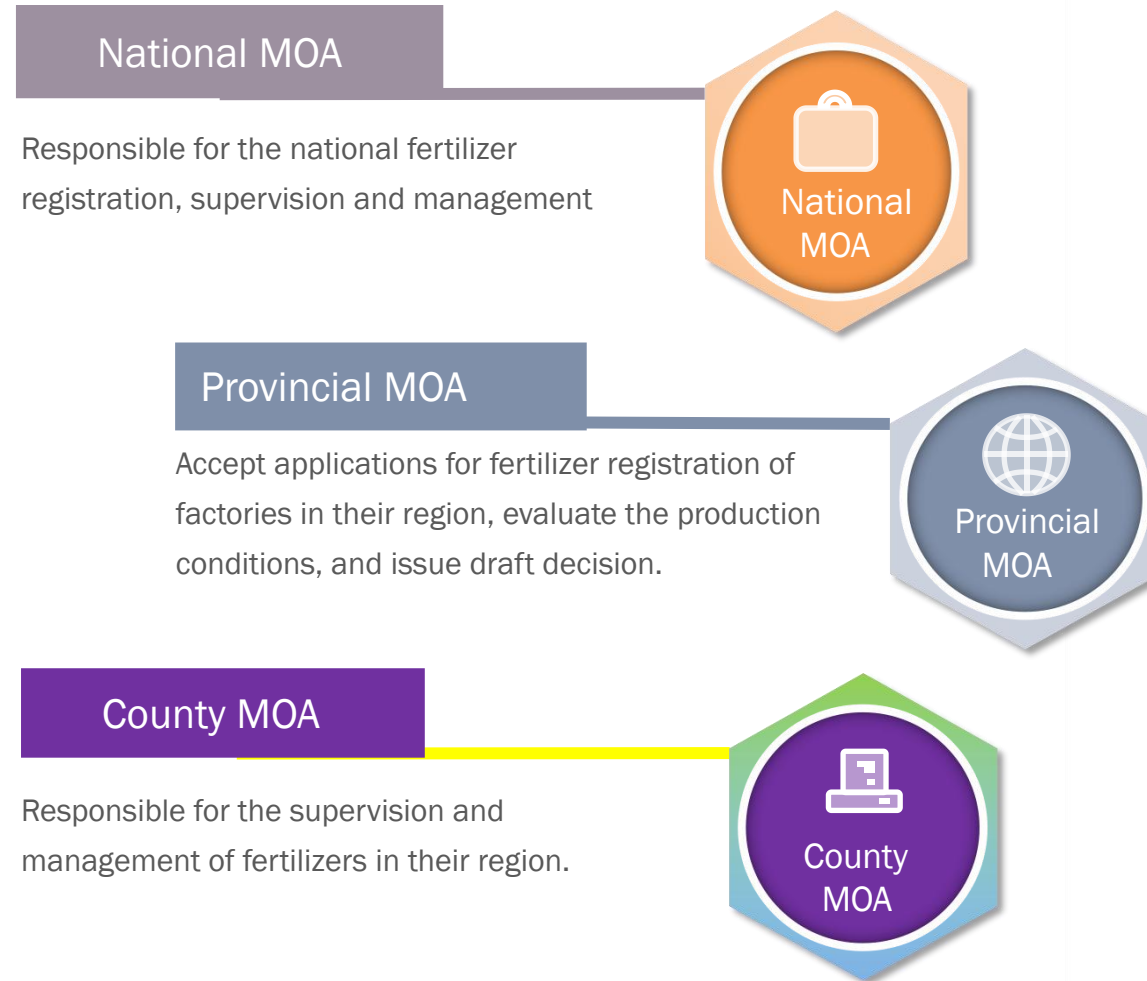
- Registration Certificate
- Competent Authority
- Type of Registered and Filed Products

Registration certificate

1. Legal pass for products to enter the market.
2. The import, production, sale, use and advertising of unregistered fertilizer products are prohibited.
3. Fertilizer manufacturing enterprises have production capacity.
4. The product quality and effect meet the requirements.



Competent Authority



Types of Registered and Filed Products

The fertilizers directly approved by MOA

Water-soluble fertilizers containing amino-acids
NY 1429-2010

Technical index	Powder	Liquid
Free amino acids	≥10.0%	≥100 g/L
Ca+Mg (Secondary element type)	≥3.0%	≥30 g/L
Cu+Fe+Mn+Zn+B+Mo (Micro-element type)	≥2.0%	≥20 g/L
Water insoluble	≤5.0%	≤50 g/L
pH(1:250 dilution)	3.0-9.0	3.0-9.0
Moisture	≤4.0%	/

Note: Ca, Mg ≥ 0.1% or 1.0g/L
Cu, Fe, Mn, Zn, B, Mo ≥ 0.05% or 0.5 g/L,
and Mo ≤ 0.5% or 5 g/L

Water-soluble fertilizers containing humic-acids
NY 1106-2010

Technical index	Powder	Liquid
Humic acids	≥3.0%	≥30 g/L
N+P ₂ O ₅ +K ₂ O (Macroelements type)	≥20.0%	≥200 g/L
Cu+Fe+Mn+Zn+B+Mo (Micro-element type)	≥6.0%	≥60 g/L
Water insoluble	≤5.0%	≤50 g/L
pH(1:250 dilution)	4.0-10.0	4.0-9.0
Moisture	≤5.0%	/

Note: N, P₂O₅, K₂O ≥ 2.0% or 20 g/L
Cu, Fe, Mn, Zn, B, Mo ≥ 0.05% and Mo ≤ 0.5%

Products Registration and Filing in China

The fertilizers reviewed by Review Committee of MOA

Common Name	Standard
Organic water-soluble fertilizers	Enterprise standard
Soil conditioners	Enterprise standard
Micronutrients fertilizers	Enterprise standard
Non-water soluble secondary element fertilizer	Enterprise standard
Slow-release fertilizers	Enterprise standard

Organic Water-soluble Fertilizers

Definition: a liquid or solid water-soluble fertilizer containing biostimulant components including: free amino acids, humic acid, seaweed extract, chitosan, polyglutamic acid, polyaspartic acid, molasses, low value fish, fermenting degradation products and other organic resources, as the main raw materials, adding appropriate amount of macroelements, secondary elements or micro-elements according to the needs of plant growth, processed by physical, chemical or biological processes.

Types (by raw material):

- 1) Seaweeds: Kelp, Ascophyllum Nodosum , cagassum , Phaeophyta, etc. ;
- 2) Chitin from Shrimp shell and crab shell;
- 3) Molasses fermentation concentrate;
- 4) Low-value fish;
- 5) Other categories: Pomace, Corn steep liquor, soybean meal, etc.

Technical specification : Organic matter; pH; water-insoluble matter, (macro elements, medium elements, and micro-elements)

Product Registration and Filing in China

The fertilizer filed in MOA

Common Name	Standard
Water-soluble macronutrient fertilizers	NY 1107-2020
Magnesium potassium sulfate for agriculture	Enterprise standard
Magnesium potassium chloride for agriculture	Enterprise standard
Water-soluble fertilizers containing calcium and magnesium	NY 2266-2010
Water-soluble fertilizers containing micronutrients	NY 1428-2010

<http://202.127.42.127/moafer/list.jsp>

Water-soluble Macronutrient Fertilizers **NY 1107-2020**

Technical index		Solid	Liquid
N+P2O5+K2O		≥50.0%	≥400 g/L
Water insoluble		≤1.0%	≤10 g/L
Biuret		≤0.9%	≤0.9%
Moisture		≤3.0%	/
Chloride ion	Chlorine not marked	≤3.0%	≤30 g/L
	Marked with low chlorine	≤15.0%	≤150 g/L
	Marked with medium chlorine	≤30.0%	≤300 g/L

Note: N or P2O5 or K2O ≥ 4.0% or 40 g/L

Water-soluble Fertilizers Containing Calcium and Magnesium

NY 2266-2012

Technical index	Powder	Liquid
Ca+Mg	≥10.0%	≥100 g/L
Water insoluble	≤5.0%	≤50 g/L
pH(1:250 dilution)	3.0-9.0	3.0-9.0
Moisture	≤3.0%	/

Note: Ca or Mg ≥ 1.0% or 10 g/L; it can also include micro-elements like Cu, Fe, Mn, Zn, B, Mo, each ≥ 0.1% or 1 g/L

Water-soluble Fertilizers Containing Micro-elements

NY 1428-2010

Technical index	Powder	Liquid
Cu+Fe+Mn+Zn+B+Mo	≥10.0%	≥100 g/L
Water insoluble	≤5.0%	≤50 g/L
pH(1:250 dilution)	3.0-10.0	3.0-10.0
Moisture	≤6.0%	/

Note:

Cu, Fe, Mn, Zn, B, Mo ≥ 0.05% or 0.5 g/L,
and Mo ≤ 1.0% or 10 g/L

Other Products



•Type 1: Exemption of registration

Ammonia sulfate, Urea, Ammonium nitrate, Calcium cyanamide
Ammonium phosphate(mono and di), Phosphor nitrate,
Calcium superphosphate, Potassium chloride, Potassium sulfate
Potassium nitrate, Ammonium chloride, Ammonium bicarbonate,
Calcium magnesium Phosphate, Potassium dihydrogen phosphate
Single microelement fertilizers, High concentration compound fertilizers

•Type 2: Registration at provincial level

Compound fertilizers; Bulk blending fertilizers;
Organic-inorganic compound fertilizers;
Organic fertilizers; Soil acid regulating agents

•Type 3: Products out of Fertilizer Registration scope

Homemade organic fertilizer produced by the farmers
Fertilizer-pesticide mixtures (Pesticide registration)
Plant growth regulators (Pesticide registration)

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Registration Types & Requirements

- Fertilizer Registration
- Registration Renewal and Registration Amendment

Registration Type

Fertilizer Registration

- Before placing on the market or advertising
- Effective for 5 years

Registration Renewal

- Applied 90 days before expiration
- Effective for 5 years
- If failed to renewal before the expiry date, the company should apply for a new registration

Registration Amendment

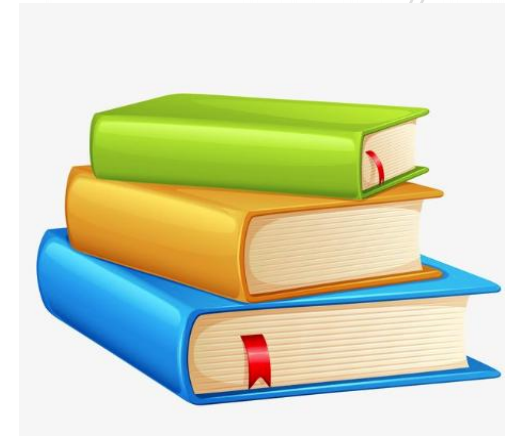
- Alter the crop range, product trade name or company name, agent (for foreign enterprises)
- If alter the composition or formulation type, the applicant should apply for a new fertilizer registration

Unregistered fertilizer products shall not be imported, produced, sold or used, and shall not be advertised.

--- *Administrative Measures of Fertilizer Registration*

Fertilizer Registration documents (Imported products)

1. Application form
2. Product Safety Data (Products with high risks)
3. Test reports: field trial (In China)
4. Draft label (Chinese)
5. Label in country of origin
6. Enterprise and product information
including: basic information of the enterprise,
enterprise Product R&D report, manufacturing process
7. Product Quality Commitment
9. Business license (Chinese agent)
10. Agency Agreement
11. Enterprise registration certificate issued by the government of the
country (region)
12. Production and sales certificate approved by fertilizer management
organization
13. Pictures of production and testing equipment
14. Product samples
15. Other documents: trademark, ISO.



Registration Renewal

Application form

Other supporting data

- Enterprise evaluation form
- Annual product quality report
- Summary of product application in China

Registration Amendment

Application form

Other supporting data

- Target crop range change
 - field efficacy test, updated draft label
- Product trade name change
 - updated draft label
- Company name change
 - updated credential documents

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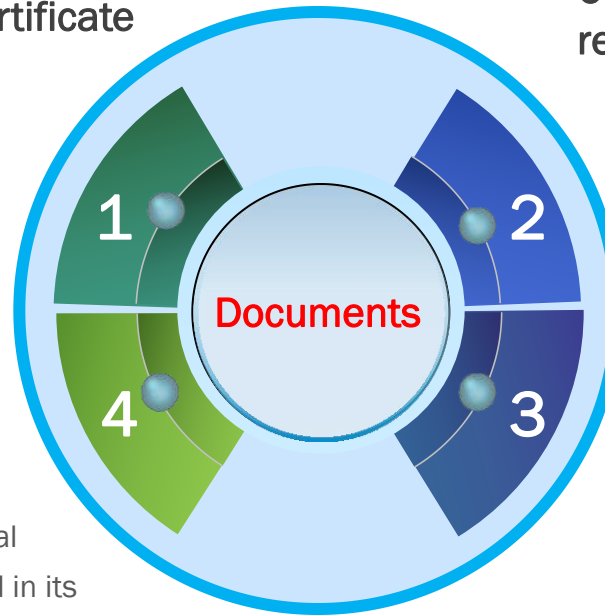
Risk Management of Overseas Companies

- Document Requirements
- Foreign Applicant and Chinese agent
- Change Agent
- Risk Points and How to Avoid Risks?

Special Documents for Imported Products

Business Registration Certificate

Proof that the applicant is a fertilizer manufacturer, legally registered in its country.



Certificate of production and sales of registered products

Proof that the applied product is legally produced and sold in its country.

Original foreign label

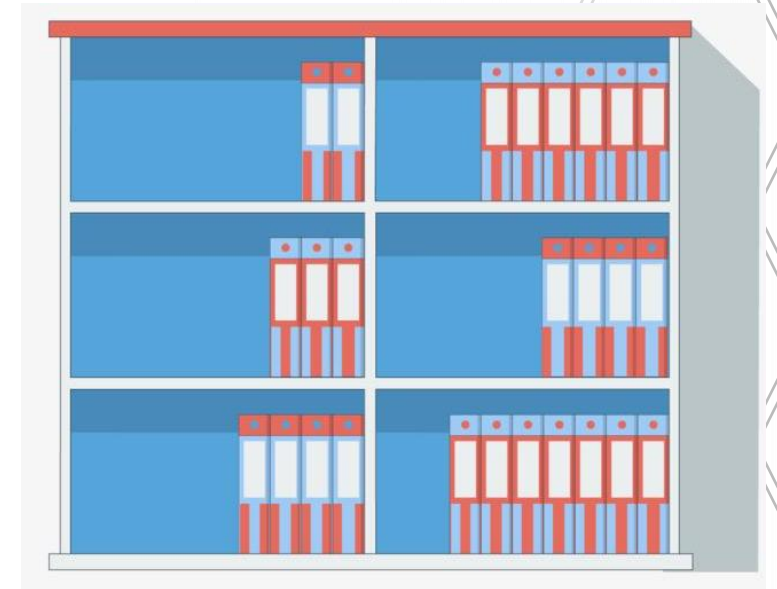
Proof that the product's technical indicators and scope of use sold in its original are consistent with which will be put in Chinese market

Agency Agreement

Determine the responsibilities of both foreign applicant and Chinese agent.

Foreign Applicant and Chinese Agent

1. Foreign applicant: Fertilizer manufacturer need to set up a resident representative office or entrust a Chinese agent.
2. Chinese agent(or Office): Sole agent, responsible for handling fertilizer registration, packaging, import fertilizer and other services on behalf of foreign applicants, and bear corresponding legal responsibilities in China.
3. Foreign applicant and Chinese agent(or Office): Sign the agency agreement, the agency agreement should clearly define the above responsibilities.



Change Agent



Choosing the right sales agent in China is very important!

1. Application form;
2. Termination agreement with former sales agent;
3. New Agent Agreement with new sales agent;
4. New product label;
5. Business License of New Agency;

Note: If there are disputes between the two parties in trade or law, the MOA will not accept agency change.



How?

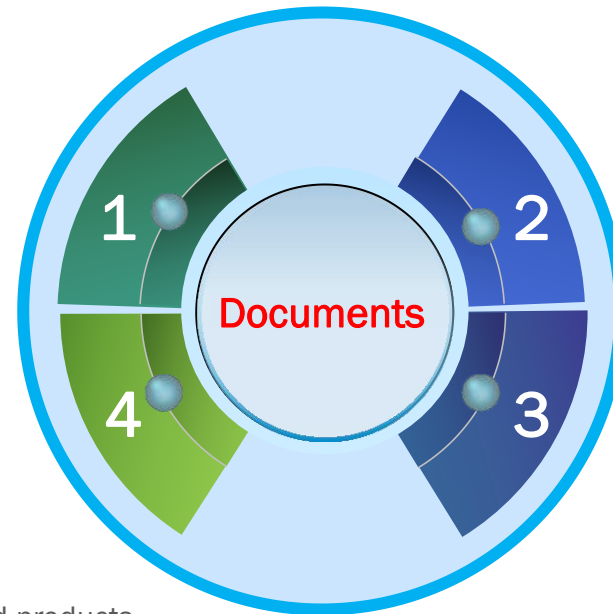
Risk Points and How to Avoid Risks?

Registered products

1. Chemical fertilizer and microbial fertilizer
2. Standard products and non-standard products
3. Meet the requirements of Chinese standards

Documents from Country of origin

1. Business Registration Certificate
2. Certificate of production and sales of registered products
3. Original foreign label



Chinese sales agent

1. Set up own company in China
2. Sign conditional contract with Chinese agent
3. Register own patent and trademark in China

Technical confidentiality

1. Detailed production process
2. All production equipments
3. Personnel and financial information

1. Unsatisfactory sales
2. Lack of responsibility
3. Tense relations
4. Unauthorized OEM processing
5. Little or no import

Our Services



Fertilizer registration



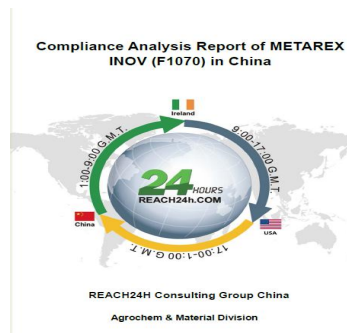
Test supervision



Regulatory training



Interpretation of policies and regulations



Regulatory and market analysis report



Label review of commercial products

Thank You.

Contact us for global regulatory services



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