

Pesticide Monitoring - PesticideUnit

Network on Pesticide Monitoring
Minutes of the 12th meeting
Held on 15-16 October 2014, Parma
(Agreed on 21 November 2014)

Participants

- **Network Representatives of Member States (including EFTA Countries):**

Country	Name
Austria	Roland Grossgut
Bulgaria	Lyubina Donkova
Croatia	Božena Deždek
Cyprus	Agathi Anastasi
Czech Republic	Petr Cuhra
Denmark	Jens Hinge Andersen
Estonia	Kadi Padur
Finland	Kalevi Siivinen
France	Laurence Delaire
Germany	Matthias Frost
Greece	Komninos Stougiannidis
Hungary	István Buzás
Italy	Roberta Aloi
Latvia	Guntis Cepurnieks
Lithuania	Vytautas Tamošiūnas
Luxembourg	Danny Zust
Malta	Charles Tanti
Netherlands	Henk Van Der Schee
Poland	Božena Morzycka
Portugal	Maria Beatriz Barata
Romania	Oana Stroie
Slovakia	Jarmila Durcanská
Slovenia	Marjana Drobnič
Slovenia	Metka Prvinšek
Spain	Alicia Yagüe Martín
Sweden	Anders Jansson
United Kingdom	Helena Cooke
Iceland	Katrin Gudjonsdottir
Norway	Randi Bolli
Norway	Per Bratterud
Norway	Marit Lilleby Kvarme

- **EFSA:**

Pesticide Unit

- Hermine Reich (Senior Scientific Officer – MRL Team Leader)
- Daniela Brocca (Scientific Officer)
- Paula Medina-Pastor (Seconded National Expert)

Dietary and Chemical Monitoring Unit

- Giuseppe Antonio Triacchini (Scientific Officer)

Assessment and Methodological Support Unit: (participated in agenda point 8.2)

- Jane Richardson (Survey and Observational Design Team Leader)
- José Cortiñas Abrahantes (Scientific Officer)

- **Others:** (participated in agenda point 8.2)

- Elasma Milanzi (University of Hasselt, Belgium)
- Edmund Njeru Njagi (University of Hasselt, Belgium)

1. Welcome and apologies for absence

The Chair welcomed the participants.

Apologies were received from Belgium (Jean-Francois Schmit) and Ireland (John Acton). DG SANCO - Unit 3 and the Pesticide EURL representatives' apologies for their absence.

2. Adoption of agenda

The agenda was adopted without changes.

3. Declaration of interest

No interest was declared on any of the agenda points.

4. Agreement of the minutes of the 11th meeting of the Network on Pesticide Monitoring held on 19-20 March 2014, Parma.

The minutes were agreed by written procedure on 23rd April 2014 and published on the EFSA website on the 24th April 2014. No additional comments were received during the meeting.

5. Agreement on the revised mandate of the Pesticide Monitoring Network

The Pesticide Monitoring Networking Group was established in 2008. The current mandate as an EFSA network was adopted by the EFSA Executive Director in May 2011. The mandate of the members is established for three years and therefore should be renewed in 2014. Following the discussion at the EFSA Joint Science Meetings, a renaming of the Pesticide Monitoring Networking Group to Pesticide Monitoring Network has been proposed. In October 2014 the network was consulted by written procedures with regard to the renaming of the group of experts and the update of the terms of reference (ToR). At the meeting all the network members agreed on the revised 2014 mandate.

6. Topics for discussion

6.1 2013 pesticide monitoring data collections: EFSA and MS feedback

EFSA gave feedback to the Member States (MSs) on the 2013 Data Collection that remained open from the 30th of April and closed on the 31st of August 2014.

In 2014, for the first time, all the 29 reporting countries managed to transmit their monitoring data within the legal deadline. Furthermore, the data transmission was also tested by two new reporting countries (Croatia and Switzerland). For a few Member States, the data validation is still ongoing. EFSA informed the participants that in 2013 the number of food samples tested for pesticide residues increased compared to the previous control years. Finally, the process of validation and data acceptance was faster than in the past.

MSs explicitly expressed their thanks regarding the support provided by the EFSA colleague in the Data Unit responsible for the data collection. The prompt replies and constant assistance during the data transmission were an important element that helped to have the work accomplished within the legal deadline.

Some specific issues encountered during the 2013 monitoring data collection were discussed. EFSA rejected samples of processed oats being reported in the framework of the EU coordinated programme (EUCP). During the data validation only raw food products except indicated otherwise (e.g. orange juice, wheat flour, wine, olive oil) were accepted. This point was confirmed by Commission. Some MS mentioned that they would not be able to take the requested number of samples of unprocessed oats because this product would not be available. It was agreed that more guidance should be provided in general for cereals as to what extent also processed products could be analysed in the framework of the EUCP.

Another MS asked if the non-compliant samples could be reported in the validation report provided by EFSA. EFSA informed that by including the 'rejected' samples the report would be very bulky, difficult to forward and the system might get blocked.

EFSA informed that the date for the implementation of the SSD2 data model will set only once the pilot project, which is still on-going, will be finalised and the feedback received by the testing countries will be addressed and solved, if any.

Two MSs requested to make available the tools, which are used to ease the preparation of the 2014 national monitoring datasets earlier than in 2013.

6.2 Review and amendment of the SSD controlled terminologies to report the 2014 pesticide monitoring data (in particular PARAM, PARAMTYPE, MATRIX, PRODTREAT)

Pesticides and food products reported as 'not in list' during the 2013 data collection were discussed. New PARAM codes were agreed with the MSs. For those food products not explicitly covered by the EU MRL food classification, the MSs were invited to contact the Commission, to ask for an update of the TAX-SA classification. EFSA will provide the MSs with the form necessary for such requests.

For substances for which new PARAM codes were requested EFSA proposed as a general approach, that for substances not explicitly mentioned in legal residue definitions but which are actually detected in samples, MS should make an application in accordance with Article 6 of Regulation (EC) No 396/2005 to revise the legal residue definition. Thus, for coumaphos-oxon no new PARAM Code was assigned, whereas for methyl-N-(3-hydroxyphenyl) carbamate, which is part of the legal residue definition for animal products for phenmedipham, the need of defining a new PARAM code was agreed.

EFSA presented the 'matrix tool' to the MSs. The tool was prepared to facilitate the identification of the correct PARAM code for all pesticide/commodity combinations covered by the EU MRL legislation. It will replace the 'PPP_Catalogue'. The matrix tool contains two separate lists: Table A and Table B. In Table A, the reporting name, the legal residue

definition and the PROD Code are linked with the PARAM code reflecting the legal residue definition for the pesticide/crop combination. Pesticides that are not listed in Annex II or III of Regulation (EC) No 396/2005 (thus, pesticides covered by Annex V, pesticides that are covered by Article 18(1)(b) of the MRL regulation) are not yet incorporated, but this work will be completed by EFSA within the next weeks. In future, for the preparation of the data analysis reported in the Annual Report on Pesticide Residues, EFSA will not take into account results using the inappropriate PARAM codes for the pesticide/crop combinations (i.e. combinations not listed in this Table A). In Table B, PARAM Codes which do not reflect the 'legal residue definitions' but were allocated to the individual substances of the complex residue definitions (codes that, according to the EFSA guidance document should be associated with PARAM type P002A) will be listed. In principle, results reported with PARAM codes listed in Table B will not be used for the data analysis on the preparation of the Annual Report. The MSs acknowledged the tool and asked to keep it updated to reflect changes of residue definitions resulting from new legislation.

EFSA also proposed to change the approach for coding the PARAM Types. A new code P005A (Compliance with current Residue Definition) was proposed which should replace P001A and P003A. For PARAM codes listed in Table B 'P004A' (Sum based on subset) should be used. In addition, P004A should also be used for PARAM codes listed in Table A but where the analysis did not cover the full residue definition (e.g. not all metabolites were analysed).

MSs in principle accepted the proposal but were of the opinion that the description of the code P004A should be changed to distinguish codes from Table B than Table A. Also the wording describing the codes P004A should be revised. MSs were reminded that the PARAM Type is an obligatory field in the data collection and that the description of the existing codes could not be changed. Thus, if the current PARAM type wording is not appropriate, new codes with new descriptions should be assigned.

Member States are invited to submit their views in writing by 15th November 2014. In particular proposals on the coding of the PARAM Types should be submitted.

6.3 Review of the EFSA Guidance Document on the use of SSD for the 2014 pesticide monitoring data submission

EFSA informed the MSs that the EFSA Guidance Document on the use of SSD for the 2014 pesticide monitoring data collection will be substantially revised. EFSA proposed to set up an electronic working group (e-WG) to draft a first version of the new revision of the Guidance which will be presented for commenting and final approval to all MS. Two MSs volunteered to take part on this working group. EFSA invited experts to express their interest in participating in the e-WG before the 30th of October 2014.

6.4 EFSA recommendations to MS in 2012 Annual Reports on Pesticide Residues

The draft recommendations that will be published in the 2012 Annual Report were presented to MS experts. Member States were also invited to provide comments during the Member State consultation, also experiences during the data collection/data validation or generation of data that would trigger recommendations to EFSA or COM (e.g. the problem encountered with oats, see point 6.1). MS welcomed the recommendation to give further guidance to MSs on how to code results for processed food, in particular for processed food products listed in Annex I of Regulation (EC) No 396/2005 (e.g. tea, dried pulses) since this point lead to different interpretations. One expert involved in the SSD2 project emphasised that the future SSD2 will allow the reporting of more information on the 'product treatment' of the tested food samples. Some MS indicated that the current practice of not converting the analytical result but converting the MRL using the processing factors should be kept to check the sample compliance against the MRL. The network stressed that establishing Annex VI of Regulation (EC) No 396/2005 would facilitate the enforcement of MRLs for processed food. A MS suggested that MSs should report the processing factors used on the National

Summary Report (NSR) (a separate paragraph on this subject should be included in the template for the NSR).

7. Agreements

The 11th Monitoring meeting minutes were approved by the Network.

The 2014 mandate and ToR for the Pesticide Monitoring Network were agreed by all Network participants.

8. Topics for discussion

8.1 Data Warehouse access rules: state of the play

EFSA informed MS that the Data Warehouse Access Rules were agreed in the SCoPAFF but still need to be formally taken note/adopted at the level of the General Food Law Standing Committee.

8.2 EFSA project on monitoring data representativeness and review of the EU-coordinated control programmes design: project progress

The interim results concerning the EFSA project on the representativeness of monitoring data and on the review of the EU-coordinated control programmes design was presented by the external contractor. A presentation was given on the project status, focussing on the statistical analysis to understand the representativeness of the food items covered by the current EU-coordinated programmes, on the potential difficulties related to some missing consumption data and the possible design enhancement through a framework based on the food selection survey sampling. Finally, the potential sources of bias in the EU-coordinated programmes were reported along with some concluding remarks.

The contractor identified a correlation for commodities with high consumption and higher MRL exceedance rate, but MS experts were of the opinion that this finding is mainly related to the fact that products consumed frequently are more often analysed for pesticide residues than those not so highly consumed. The contractor also presented an approach that the total number of samples should be distributed among the Member States not according to the population, but according to the frequency of its consumption in the respective country. The report will be finalised in February 2015. The recommendations and findings will be taken on board in new monitoring Regulations, but will impact only the programmes of 2017 onwards.

8.3 How MRLs are set? An introduction from EFSA

Upon request of the Network, EFSA presented the procedures of MRL setting. This presentation was very much appreciated by the attendees. MSs highlighted the need of having further guidance on how to enforce MRLs for pesticides with complex residue definitions (residue definitions that comprise multiple components) that are set at the LOQ.

8.4 MRL Database

EFSA informed that for the 2014 data collection the MRL database, which will be developed and provided by EFSA, will be based on the DG SANCO MRL database. Meanwhile, the Commission is conducting a survey that will allow MSs to provide feedback on the existing the EU Pesticide Database. EFSA reminded and encouraged MSs to conduct this survey as an updated and useful database will have a positive feedback on the EFSA MRL database provided to data providers.

8.5 2015 EU-coordinated programme: voted Regulation

MSs were informed that the 2015 EU-coordinated programme Regulation was voted and published as Regulation (EU) No 400/2014 on the Official Journal L 119, 23.4.2014, p. 44–56.

8.6 Chlorate residues in food: information on the EFSA data collection

EFSA reminded MSs about the collection of data on chlorates residues in food and drinking water, which is managed by the Data Unit of EFSA. Some MSs informed that no data will be provided since the request for analysing chlorate was decided too late to be considered in the national sampling programme. Some MS will reanalyse samples that have been taken earlier. Some MS will not be able to finalise the method validation before the end of the year. There were also questions to be clarified regarding the need to analyse samples of drinking water since this matrix is not within the remit of the laboratories. Thus, no or limited results on water will be sent to EFSA.

8.7 EFSA Guidance on Statistical Reporting

MSs were informed that a new EFSA Guidance on Statistical Reporting is under preparation. This Guidance will not have an impact on the pieces of information to be reported to EFSA in the framework of the pesticide monitoring data collection.

8.8 New Regulation (EC) No 882/2004 on food control: state of the play

MSs were informed that the new, draft Regulation, superseding Regulation (EC) No 882/2004, is currently under discussion at Council level. The main direct implication of the new Regulation, which would impact the work of the Pesticide Monitoring Network, is the anticipation of the deadline for closing the data collection to 30th June instead of 31st August each year.

8.9 Dates for next Network meetings

The two 2015 Network meetings have been scheduled for 2015: 18-19 March 2015 and 14-15 October 2015. The March meeting still needs to be confirmed. If the March meeting is cancelled, EFSA will explore the possibility of having an IT meeting with data-manager experts; the meeting will deal with technical issues related to SSD2 implementation.

9. Any Other Business

The Network was asked to suggest specific topics of interest to be addressed during the 2015 meetings. The Network would appreciate a presentation and discussion on the RASFF notification system and the different approaches adopted by the MSs for notifying the potential risks linked to pesticide residues detected in food.

10. Conclusions (s)

By the 15th of November 2014 MSs are invited to provide EFSA with their feedback on the new PARAM Type approach discussed over the meeting.

By the 30th of October 2014 MSs are invited to inform EFSA if they volunteer to participate in the electronic working group, which will revise the Guidance Document on the use of the SSD for 2014 pesticide monitoring data collection.