European Food Safety Authority

PESTICIDE UNIT

Network on Pesticide Monitoring
Minutes of the 13th meeting
Held on 14-15 October 2015, Parma

(Agreed by written procedures on 09 November 2015)

Participants

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

Country	Name
Austria	Roland Grossgut
Belgium	Jean-François Schmidt
Bulgaria	Lyubina Donkova
Croatia	Božena Deždek
Cyprus	Agathi Anastasi
Czech Republic	Petr Cuhra
Denmark	Jens Hinge Andersen
Estonia	Kadi Padur
Finland	Sanna Viljakainen
France	Laurence Delaire
France	David Tubert
France	Benoît Ginestet
Germany	Matthias Frost
Greece	Komninos Stougiannidis
Ireland	Finbarr O'Regan
Hungary	István Buzás
Italy	Roberta Aloi
Latvia	Elīna Ciekure
Lithuania	Agnietė Grušauskienė
Luxembourg	Fabienne Clabots
Malta	Dawn Grech
Netherlands	Henk Van Der Schee
Poland	Bożena Morzycka
Portugal	Maria João Lino
Romania	Oana Stroie
Slovakia	Jarmila Durcanská
Slovakia	Maria Matusova
Slovenia	Marjan Markelj
Slovenia	Metka Prvinšek
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Iceland	Ingibjörg Jònsdoòttir
Norway	Randi Bolli
Norway	Per Bratterud
Norway	Hanne Marit Gran

- **European Commission:**

Veerle Vanheusden (DG SANTE- Unit 3): participated in agenda point 4.2

Michelangelo Anastassiades (EURL for Pesticide Residues)

Carmen Ferrer Amate (EURL for Pesticide Residues)

- **EFSA:**

Pesticide Unit:

Hermine Reich (Senior Scientific Officer – MRL Team Leader)

Daniela Brocca (Scientific Officer)

Evidence Management Unit:

Giuseppe Antonio Triacchini (Scientific Officer)

Alessandro Carletti (Scientific Officer): participated in agenda point 4.10

Mario Monguidi (Scientific officer): participated in agenda point 4.10

Davide Gibim (Scientific officer): participated in agenda point 4.10

Francesco Vernazza (Senior Scientific Officer): participated in agenda point 4.11

Anca Stoicescu (Scientific Officer): participated in agenda point 4.8

Legal & Regulatory Affairs Unit:

Claus Reunis (Legal Officer): participated in agenda point 4.12

1. Welcome and apologies for absence

The Chair welcomed the participants.

All but one of the national representatives participated in all agenda points. The Slovenian representatives had to leave the meeting before the closure and did not attend the agenda points discussed during the afternoon section of the second meeting day.

2. Adoption of agenda

The agenda was adopted without changes.

3. Agreement of the minutes of the 12th meeting of the Network on Pesticide Monitoring held on 15-16 October 2014

The minutes were agreed by written procedure on 21st November 2014 and published on the EFSA website on November 22nd 2014.

4. Topics for discussion

4.1 EFSA recommendations to MS in 2012 and 2013 Annual Reports on Pesticide Residues

EFSA presented the recommendations derived in the two recent Annual Reports on Pesticide Residues, i.e. the 2012 report published in December 2014 and the 2013 report

published in March 2015. The presentation is available to the participants via DMS. Member States (MS) commented on some of the following recommendations presented by EFSA:

- High Maximum Residue Level (MRL) exceedance rate for CS_2 in certain food products: experts noted that data on the background levels can be provided (EURL reported a background level of 0.8 mg/kg for broccoli). In addition it was proposed to use supervised field trials data to increase the database.
- Discrepancy between MRL for pesticides and veterinary medicines: MS asked for clear guidance which MRL should be used for enforcement. For this question the European Commission (COM) should be asked to provide legally binding clarifications.
- Number of organic samples taken in the framework of the EU-coordinated control programme (EUCP): some MS were of the opinion that the number of samples is sufficient, since the probability of finding residues was very low. A suggestion was also given to eventually reduce the number of samples on organic products for saving financial resources that could be spent for monitoring a larger number of samples of the other commodities.
- MS agreed on the EFSA recommendation that for baby food realistic default MRL need to be established for the naturally occurring substances, like residues of bromide ion, CS_2, copper etc.
- Reporting of the Limit of Detection (LOD) in addition to the Limit of Quantification (LOQ): MS felt that clear guidance would be needed how to report this additional piece of information.

4.2 Summing-up the LOQs: COM working document and state of the paly/timelines

At the meeting EFSA gave a presentation on the revised version of the draft COM working document, which presents a concrete proposal on the handling and reporting of the (sum) LOQs in case of “Complex Residue Definitions” (complex RD). Complex residue definitions are residue definitions that contain more than one component. In cases where for such residue definitions individual components are measured separately, different MS used so far different approaches for reporting the numerical LOQ value for the analytical result for the total residue definition (resLOQ value). These differences lead to an inaccurate interpretation and assessment of the pesticide monitoring data transmitted by MS to EFSA. The working document prepared by COM in collaboration with EFSA is meant to provide a harmonised approach to avoid such divergences in future. EFSA presented the document and informed the participants that the adoption of the document is planned for the next SCPAFF (30 Nov-1-Dec 2015). Furthermore, EFSA informed the meeting attendees on the collaboration with the EURL on the establishment of a comprehensive list of complex legal residue definitions, being this list to be further discussed and agreed with the MS. During the meeting the national experts did not disagree on the approach proposed; some comments were made on the default value of “99999” to be returned instead of the calculated summed resLOQ value; one MS felt that this standard value could lead to communication problems. One MS proposed to reconsider the definition of complex residue definition: an operational definition would be favoured, meaning that a complex residue definition is a definition that contains components that are analysed separately. The approach described in the working document will be applicable from the 2017 data collection onwards.

4.3 2014 pesticide monitoring data collection: EFSA and MS feedback

EFSA informed the Network on the status of the 2014 pesticide monitoring data collection, which opened on April 2015. For the first time, 30 countries contributed to the collection, having Croatia transmitted for the first time the official and complete dataset in 2015. On the basis of preliminary 2014 data analysis, EFSA informed that more than 1,000 different

pesticides have been tested in the frame of the national control activities among all reporting countries; in addition, the overall data volume concerning the monitoring reference period 2014 has further increased compared to the past: about 21 millions of single analytical determinations reported. The largest majority of this data was reported within the deadline; thus, 80% of the total number of files was on the FINAL MOPER 2014 by the end of August 2015. EFSA acknowledged and appreciated the large efforts made by the reporting countries in addressing the technical and coding changes introduced for the 2014 data transmission and apologised for the late publication of the Guidance on the Use of the SSD for the 2014 data collection. The revision and publication of the Guidance for the next data collection is foreseen well in advance compared to the previous one, considering that very minor amendments will need to be introduced. The Network acknowledged and thanked the EFSA data manager for his continuous support provided during the reporting season.

4.4 Review of the EFSA Guidance Document on the use of SSD for the 2015 pesticide monitoring data submission; feedback on the use of the MatrixTool2014 and new PARAMTYPE code

In view of the preparation of the EFSA Guidance for the 2015 data collection, EFSA informed the meeting participants that no major changes are intended for the document compared to the previous revision; nevertheless, amendments are still needed in the document in order to reflect the changes occurred in the EU legislation with regard the pesticide residue control activities (e.g. the amendments of Regulation (EC) No 669/2005, the publication of the EU-coordinated control programme 2015-2017, etc.). Beside these changes, EFSA suggested to include in the new Guidance additional explanatory examples on challenging issues, which arose during the 2014 data collection and concerning the coding of specific food samples. The MS representatives agreed on the EFSA proposals. In particular, MS pointed out the need to allow the selection of an additional code for the SSD data element “Expression of the result” for milk and egg samples (including the related processed products): for these food items the Network agreed on the possibility to use both code B003A “Fat basis” and code B001A “Whole weight”. The business rules applied upon data transmission to EFSA will be amended accordingly. Finally, the Network agreed on the “product treatment” codes to be selected for the reporting of the 2015 results generated in the framework of the 2015 EUCP. These codes will be included in the revised version of the Guidance document on the SSD use for the 2015 data collection. One MS had problems in using the template prepared for the national summary report, related to the template styles and formats. EFSA will investigate how this problem can be solved. EFSA will complete the new guidance document in February 2016.

4.5 Review and amendment of the SSD controlled terminologies to report the 2015 pesticide monitoring data (in particular PARAM, PARAMTYPE, MATRIX, PRODTREAT)

In advance of the Network meeting EFSA invited the MS representatives to provide inputs on the annual revision of SSD catalogues. EFSA only received proposals for allocation of new “substance” codes for e.g. pesticide metabolites not yet present in the PARAM catalogue. EFSA addressed the national proposals and will assign new codes as requested. During the meeting the potential need to create new SSD codes for the reporting of the baby food samples was briefly discussed by considering the new legislation in place on these particular food products. MS were reminded that overall the Baby Food legislation will be revised. It is intended to create a link to the residue definitions set in the frame of Regulation (EC) No 396/2005. EFSA informed the meeting participants that EFSA will be mandated by COM to provide a scientific opinion on the approach to be used for setting legal limits for baby food. EFSA will keep the Network informed on this topic.

4.6 Tool and tables for coding paramType to PARAM

One MS presented an electronic tool that was developed at national level; this tool makes use of the EFSA “MatrixTool” and is intended to map the paramType codes to the specific

PARAM codes. This tool could be used by EFSA for further elaborating TableB and TableBabyFood of the MatrixTool. In general, it was noted that it would be useful to include the baby food and fish codes in TableA of the MatrixTool. A more detailed coding list for different types of baby food would be also useful. A proposal will be presented by the concerned Member State.

4.7 Pesticide Residue new food classification: Regulation No 212/2012 and amendments

Point not discussed.

4.8 Veterinary drugs data collection: overlapping reporting with pesticide monitoring data – issues and solutions

The meeting participants were informed that a new EFSA Network has been recently established and will meet for the first time in February 2016: the Scientific Network on Residues of Veterinary Medical Products Data Collection. The legislation of reference for this new Network is Council Directive 96/23/EC, which partially overlaps with Regulation (EC) No 396/2005 on certain substances ("dual substances") that can be used as both pesticides and veterinary medicines (e.g. amitraz, cyfluthrin, diazinon, phoxim, thiabendazole, cypermethrin, etc.). The full list of the "dual use substances" is reported in the EFSA Guidance on the Use of the SSD for the 2014 pesticide data collection. The future EFSA data collections on pesticide and vet residues will cover substances that might be submitted to EFSA in more than one data collection domain; as a result, data provided through the EFSA workflow should be identified unequivocally at record level. However, at least one MS indicated that in its current practice indeed the dual reporting of the same sample happens; in this case, the same sample is coded with two different ID sample codes. EFSA recommended the pesticide national experts to liaise on this issue with their national colleagues collecting data on veterinary residues. Furthermore, it is considered essential that the EFSA Guidance documents developed separately for the reporting of the pesticide and veterinary residues will provide consistent and unambiguous indications on how report the results considered as having a dual use. Finally, the participants were reminded on the different residue definitions and legal limits, which might have been set for the same substance/food combinations under the two legal EU frameworks.

4.9 EFSA Report on Data Representativeness

Point not discussed.

4.10 SSD2 state of the play: pilot project feedback and outcome

EFSA presented the state of the play of the Pilot Project on SSD2 implementation. Firstly, the Network was introduced to the project purpose, the timeline and a to the detailed project objectives; subsequently, the presentation focused on the preliminary comparison of the 2014 pesticide monitoring results reported for the (same) national dataset in the two different standards, SSD1 and SSD2. The results evidenced that there is no major loss of information when adopting the revised new standard and the data migration could be feasible: further discussion and data comparison is however still needed at EFSA level.

Four MS presented their first experiences gained in 2015 in implementing for the SSD2 in the frame of the 2014 pesticide monitoring data collection in the context of the above mentioned project. From the first feedback received it appears that the implementation of the SSD2 at national level would not pose difficulties for what it concerns all but one of the SSD2 catalogues; from MS perspective, the major challenge has been identified in using FoodEx2 (i.e. the SSD2 food coding system), in particular for what it concerns the processed food samples tested. For the SSD2 implementation it may take up to one year and in some cases extra staff and financial resources should be made available for the SSD2 full implementation. In some cases, the laboratory data repository systems had to be reorganised. The implementation solutions adopted by the piloting countries were all

different; all the testing countries did not make direct use of the FoodEx2 browser, but exported the information contained in this tool and prepared separate e.g. tools and tables in order to map the currently used SSD1 food coding system to the new one. In this project, the testing countries transmitted trial pesticide monitoring data in both SSD1 and SSD2 format, but not necessarily the whole datasets referring to all the control results generated in 2014. One country only transmitted the results concerning data on the raw, unprocessed food samples. The Network asked EFSA to indicate a plausible date on when EFSA is going to request all MS to code the data in SSD2 format. EFSA will need to better evaluate the preliminary results provided by the piloting countries in order to make a sound proposal. EFSA took note that a MS participating to the pilot project is willing to transmit the 2015 pesticide monitoring data in SSD2 format.

4.11 SSD2: Food classification and mapping with pesticide MRL classification

EFSA presented the recently published revision 2 of the FoodEx2 food classification. The strict connection of this classification with the list of Annex 1 of Regulation (EC) No 396/2005 (and relative updates) was highlighted. In particular, the integration of the raw commodities included in the 2014 updated food list and the insertion of the new pesticide codes in form of parallel codes was explained. The general approach of FoodEx to the identification of food was explained, with focus on two aspects: the possibility of reporting at a flexible level of detail, based on the information available and the 'automatic' connection of processed products (e.g. derivatives/ingredients and composite food) to the raw commodities originating them, thanks to the presence in the system of implicit facet descriptors. As a follow up of the discussion, the possibility of support for the use of FoodEx2 in form of 'help-desk' and specific training was offered.

4.12 Public access to EFSA documents: requests for raw data disclosure

A general presentation was made on the work process at EFSA for handling requests for public access to documents in compliance with the legal framework applicable to EFSA (Regulation (EC) No 1049/2001) and with focus on the LRA Unit of EFSA coordinating the process. The presentation was followed by a round-table discussion on the specific matter of requests for public access to documents held by EFSA containing raw scientific data provided by EU Member States or other 3rd party data providers. The following was highlighted in this regard:

- EFSA will consult with the MS/data providers concerned on a case-by-case basis within the legal time period for handling the public access to documents request (15 working days);
- Before any public disclosure, the scientific dataset will be anonymised, which means that the data will be expunged from any information on their provenance or origin as well as brand names, names and addresses of laboratories involved in chemical analysis, names and addresses of food producers, distributors and importers.

5. Any Other Business

5.1 Pesticide MRL Database

EFSA informed the Network on the bilateral collaboration with the DG SANTE in order to receive on regularly basis the information stored in the COM database on pesticide residue MRL, which are currently not directly retrievable on the database available on COM website, but are included in the data repository system hold in COM. All MS agreed that this additional information would be useful not only for EFSA but also for all the experts involved in the pesticide monitoring activities. EFSA will keep the Network informed on this issue.

5.2 2016 EU-coordinated programme: voted Regulation

For the food products covered by the 2016 EUCP EFSA agreed with MS which codes would be appropriate to describe for the food processing, with view to harmonise the approaches.

The following "product treatment" will be accepted for 2016 EUCP data: apples, head cabbage, leek, lettuce, peaches, strawberries and tomatoes: fresh or frozen (SSD PRDTR codes T998A or T999A); rye grains: unprocessed (code T999A) or milling-unprocessed flour (code T111A) or refined flour (code T112A). Alternatively, the code T110A could be used for reporting rye grains, but it would be preferable to use the more specific milling codes. Wine: the preferred codes would be T124A (white wine) or T125A (red wine), as appropriate; alternatively, the unspecific code for wine (T123A) can be selected. Cow's milk: "unprocessed" code (this means whole milk, fresh or frozen T999A) or T150A (milk pasteurisation). Processed milk products (other than pasteurised or other heat treatment) should not be taken in the framework of the EUCP. Swine fat: "unprocessed" (fresh or frozen (codes T998A or T999A).

5.3 Date for next meetings

The participants were informed on the dates for the Network meetings in 2016: 13-14 April and 12-13 October 2016. MS are welcome to propose issues and topics to be discussed and/or presented

5.4 Systematic review training

Point not discussed.

6. Conclusions

The Network meeting has proven to be a useful forum for the exchange of information, feedback and suggestions among the national experts and EFSA on different topics related to the pesticide monitoring data collection. The meeting presentations and documents are available on the EFSA DMS. The national experts are invited to submit their comments on the COM document on the summing-up of the LOQs as soon as possible and directly to the COM colleagues. With regard to the annual update of the EFSA Guidance for the reporting of the pesticide monitoring results, EFSA will amend the document by adding further explanatory examples and updated tables; the Network members are invited to forward to EFSA their suggestions for amendments of the SSD catalogues for the 2015 data collection by 30 October 2015. Both the updated Guidance on the use of the SSD and the SSD catalogues should be ready by February 2016.

7. Closure of the meeting