Network on Pesticide Monitoring
Draft minutes of the 17th meeting

Held on 12 October 2017, Parma
(Agreed on 10 November 2017)

Participants

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

Country	Name
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BELGIUM	SCHMIT Jean-François
BULGARIA	SIMEONOV Emil
CROATIA	DEZDJEK Bozena
CYPRUS	CHRISTODOULOU Despo Louca
CZECH REPUBLIC	CUHRA Petr
CZECH REPUBLIC	NEDVIDKOVA Dana
DENMARK	BJORN PETERSEN Pernille
ESTONIA	PADUR Kadi
FINLAND	RANTA Carola
FINLAND	VILJAKAINEN Sanna
FRANCE	OCHEM Anne
FRANCE	RIEU Vincent
FRANCE	VIDAL Céline
GERMANY	PIETRZYK Anne Katrin
GREECE	STOUGIANNIDIS Komninos
HUNGARY	VASARHELYI Adrienn
ICELAND	JONSDOTTIR Ingibjörg
IRELAND	O'DEA Eileen
IRELAND	O'REGAN Finbarr
ITALY	ALOI Roberta
ITALY	DE MARTINO Michele
LITHUANIA	VAICIUNAS Virginijus
LUXEMBOURG	CLABOTS Fabienne
MALTA	MIFSUD Shirley
NETHERLANDS	VAN DER SCHEE Henk
NORWAY	BOLLI Randi Iren
NORWAY	BRATTERUD Per
NORWAY	GRAN Hanne Marit
POLAND	MORZYCKA Bozena
PORTUGAL	LINO Maria João

ROMANIA	STROIE Oana
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SLOVAKIA	PIGOSOVA Petronela
SLOVENIA	MARKELJ Marjan
SLOVENIA	RUCNA Ana
SPAIN	YAGÜE MARTIN Alicia
SWEDEN	FOSTER David
SWEDEN	JANSSON Anders
UNITED KINGDOM	COOKE Helena

- **Observer Experts from non EU countries: Pre-accession or Potential Countries**

Country	Name
ALBANIA	VLADI Vjollca
BOSNIA and HERZEGOVINA	ZOVKO Ivana
Former YUGOSLAV REPUBLIC of MACEDONIA	DRNDAR Slada
MONTENEGRO	SUKOVIC Danijela
SERBIA	MATIJEVIC Lidija

- **EU Reference Laboratory (EURL) for pesticide residues in single residue methods**

  ANASTASSIADES Michelangelo

- **EU Reference Laboratory (EURL) for pesticide residues in fruits & vegetables**

  FERRER AMATE Carmen

- **EFSA**

  Pesticides Unit

  BROCCA Daniela (Scientific Officer, chair)

  MEDINA Paula (Scientific Officer)

  NOUGADERE Alexandre (Scientific Officer)

  REICH Hermine (Senior Scientific Officer)

  Evidence Management Unit

  BOCCA Valentina (Scientific Officer)

  CARLETTI Alessandro (Scientific Officer)

  MONGUIDI Mario (Scientific Officer)

  TRIACCHINI Giuseppe (Scientific Officer)

1. **Welcome and apologies for absence**

The Chair welcomed the participants.

Apologies were received from Latvia (Elina CIEKURE) and Turkey (Ahmet BOSTAN).

2. Adoption of agenda

The agenda was adopted without changes.

The members were asked by EFSA to declare any conflict of interest. The participants did not mention any conflict of interest related to the topics discussed during the meeting.

3. Agreement of the minutes of the 16th meeting of the Network on Pesticide Monitoring held on 3rd May 2017, Parma

The minutes were agreed by written procedure on 30 June 2017 and published on the EFSA website the following day. No additional comments were received after the minutes' publication or during the present meeting.

4. Topics for discussion and/or agreement

4.1. 2016 pesticides monitoring data collection and technical changes: feedback from EFSA and reporting countries

EFSA first presented the technical and procedural changes introduced in the data validation steps during the last reporting season, underlying that these modifications implied considerable efforts both from the reporting countries and EFSA.

The main improvements for the 2015 pesticide data collection realised in 2016 was an automatization of validation process and the storage of data in the EFSA Data Warehouse (DWH). For the ongoing 2016 data collection, the main changes are: the fully automated ETL step, all the data enrichments needed for analysis immediately applied to the validated/accepted data.

The current 2016 pesticide data collection (DC) opened on 15 May 2017. The legal deadline for delivering data to EFSA was 31 August 2017, and then shifted to 30 September 2017 in agreement with the European Commission (EC) due to the fipronil incident's emergency. Thirty countries contributed to the 2016 DC, with around 1,000 transmissions and a good improvement in the efficiency of DC: the number of data transmissions per country was lower in 2017 compared to the previous year reporting season; in 2017, 1 to 42 transmission messages (74 in 2016) - with an overall average of 3 messages per dataset (7 in 2016) - were recorded. EFSA mentioned the improvement of the data transmissions and finalisation of the 2017 DC with already 80% of valid data in the DWH (around 18,000,000 results) at the moment. Currently, only one country needs to accept the transmissions and another is finalizing the transmissions. It was noticed that to last year, at the same date, only 17 countries closed the data collection, 7 countries were on the way to close, while 6 countries were still working. EFSA recalled that with the implementation of the new automated validation procedures, once the datasets collected are accepted, they are already fully validated and ready in the DWH for their analysis.

Overall, the main achievements recorded during the 2016 pesticide residues DC and validation are:

- New automated procedures in place (some refinements still needed), which allows for an autonomous data check and acceptance without interaction with the EFSA data managers,

- Increased number of business rules (BR) for stronger data validation and raise of data quality,

- The faster automated creation of a validation report, which also allows for exporting, sorting and filtering its content,

- Larger number of data transmitted than last year,

- Data ready in the DWH.

EFSA indicated that the next 2017 DC will open on 15/05/2018, and invited the Network to provide comments and proposal for enhancements.

The Network welcomed the technical changes and confirmed the responsiveness and availability of EFSA staff and functional mailbox during all data collection.

During the discussion, some experts indicated the high number of warnings for some submissions and the absence of identifier for each analytical determination in the database for a given warning. To facilitate the data corrections, some participants proposed EFSA to add an identifier (if possible a hyperlink) in the warning and error messages; despite this, the majority of the countries were in favour to maintain the current messages' system.

Some participants asked for the possibility to report free text (for reporting certain food items and substances) that would not be part of the MatrixTool. EFSA indicated that generally free text information is not convenient and not automatically readable and validated. In case MSs would like to report new substances for the 2017 data collection, EFSA kindly asked to send all the requests as soon as possible and by 17/11/2017 to catalogues@efsa.europa.eu. EFSA will then include all the new substances in the MatrixTool, which will be created for the 2017 data collection.

Some participants also highlighted that several data collection approaches exists in the EU (e.g. contaminants, GMO and pesticides) due to different regulations, leading to greater complexity in data collection. The guidance documents for the different data domains should be aligned. An open source tool would be a common solution for the future. However, EFSA considered that due to the heterogeneous systems and databases in place in the MSs, and considering the limited resources, a common open source system for reporting both pesticide residues and other parameters cannot be currently developed; nevertheless, EFSA is already thinking on how to address this issue for the future.

About MRL compliance, one participant indicated that the date of harvest would be more relevant than the mandatory reporting of the date of sampling. EFSA considered that this information is difficult to obtain, and reminded that the exact date of sampling will became mandatory for the 2017 data collection.

4.2. **2016 monitoring data new Summary/Validation national report and Business Rules: feedback and proposal for improvement**

Discussion covered during the previous agenda item.

4.3. EFSA Guidance on the use of the SSD for the 2017 pesticide residues data collection: consolidated version for NG review

EFSA proposed a new Guidance Document for the 2017 Pesticide residues data collection; the new document will represent a consolidate version of the previous three guidance documents, with the addition of a few changes. The draft Guidance is available on the DMS and has to be finalised as soon as possible and at the latest by the end of November. Compared to the previous Guidance, the following changes were proposed:

- in addition to the year of sampling, also the reporting of the exact date of sampling (month "sampM" and day "sampD") is now mandatory,

- Product code (prodCode) "XXXXXXA"="Not in list" is no longer reportable,

- the four free text Standard Sample Description (SSD) data elements Analytical method text (anMethText), Parameter text (paramText), Product text (prodText) and Product comment (prodCom) are no longer reportable,

- the percentage of fat in the sample ('fatPerc') is no longer mandatory also in cases where the analytical results are reported on fat basis,

- explanations are given concerning the classification of the legal residues definitions and the reporting of the '(sum)resLOQ' in case of Multi Component Residue Definitions (CRD) (see item. 4.7),

- the list of the CRD (to be agreed by the Pesticide Monitoring Network) is provided in GD Annex.

- the table listing the full set of Business Rules (BR) is reformatted in a more transparent and explanatory way.

EFSA proposed to close the MS consultation on the draft Guidance Document on 15/11/2017 and to prepare its final version on 30/11/2017.The publication of the GD in the EFSA Journal will follow as soon as possible with the last changes reflecting the changes in e.g. the legal residue definition that may still occur until the end of 2017.

4.4. Annual revision and agreement of the SSD catalogues and Business Rules for the 2017 pesticide monitoring data collection

EFSA invited the national experts to inform as soon as possible about the new SSD catalogue codes that will be needed for the coding of the 2017 pesticide monitoring data. According to the new EFSA procedures, new codes can be allocated also in the course of the data collection; however, a major release and publication of the updated catalogues will only be done once per year. Therefore, suggestions for new SSD codes should be sent to EFSA by 15/11/2017.

4.5. SSD2: recap and discussion after the NG common session with the Veterinary Drug Residues NG. Changes in the SSD data elements from SSD1 to SSD2

This topic was rescheduled to the next meeting.

4.6. *Ad hoc* data collection on fipronil and other substances' residues in eggs and poultry meat/fat

EFSA gave a presentation aimed at complementing its first presentation on the same topic, which was given during the joint meeting session with Veterinary Medicinal Products Residues and Pesticide Monitoring of 11/10/2017.

Since July 2017, fipronil residues have been detected in eggs in Europe. Fipronil is not approved for use as veterinary medicinal substance on food producing animals, and no residues are expected in eggs and poultry meat as the authorisations in plant protection products exist only in a limited number of crops. No biocidal product containing fipronil is allowed for use in poultry stables in any EU Member State. This fipronil contamination is currently considered as the result of an illegal use of the substance on laying hens farms.

In the meeting of the Standing Committee on Plants, Animals, Food and Feed (SC PAFF) of 30/08/2017, it was agreed to organise an *ad-hoc* monitoring programme on residues of fipronil and other substances that were potentially illegally used (about 50 chemical substances) in order to get a comprehensive view on the contamination of eggs and poultry muscle/fat due to illegal uses of acaricides. The monitoring focuses on domestic, fresh produces in order to facilitate the follow-up in case of the identification of non-compliances.

Early September 2017, in collaboration with EFSA, the EC circulated to the Member States the scope and reporting requirements of this *ad hoc* data collection.

On 07/09/2017, EFSA finalised the first guidance document, specifically targeted to the fipronil monitoring data coding and reporting to EFSA. This guidance is intended for the national competent authorities in MSs that will take part in the *ad-hoc* data collection.

The *ad hoc* data collection was set-up in EFSA and was opened on 13 September; it will close on 30 November 2017.

EFSA mentioned that all monitoring data produced in 2017 can be reported under this control programme. Upon the finalised data transmission and validation, EFSA will summarise the control results in an EFSA report. There, Data from samples taken between 01/01/2017 and 31/08/2017 and from 01/09/2017 to 31/11/2017 will be reported separately. EFSA recalled that the exact date of the sampling has to be mandatorily reported in the frame of this monitoring exercise.

About the programme scope, EFSA reminded that the list of substances to be included in the *ad hoc* monitoring programme was refined. Concerning food products to be taken, the programme refers only to chicken eggs and chicken meat (chicken muscle and poultry fat, separately). Only unprocessed samples are requested, with the exception of eggs powder (powder form egg yolk, egg white or whole egg). No other processed food results are covered by the control programme. Should additional food products be analysed at national level, these could also be reported to EFSA, but not under the regular data reporting on the EFSA Data Collection Framework (DCF platform); they can be sent in Excel file directly by mail or on the EFSA DMS; instructions of the transmission of these additional results are provided in the Guidance document. EFSA also invited MSs

to immediately report to both the colleagues in DG SANTE (EU Commission) and EFSA when a non-conformity of fipronil is identified.

Regarding the data coding supporting tools, the list of business rules (BR), the full list of reportable food codes (*ad-hoc new* MATRIX codes) and the MatrixToolFipronil_2017 will be made available on the DMS after the meeting, along with the MRL compilation for fipronil and all other substances that are covered by this ad-hoc control programme.

EFSA shortly presented also the Guidance Document prepared for the Fipronil data collection and reporting.

Up to now, twenty-five countries have already informed EFSA on the nominated national data providers for this data collection; EFSA invited the remaining countries to communicate as soon as possible their intention to participate to this exercise and about the nomination of the official data providers.

4.7. Implementation of the Commission's Working document on the summing up of LOQs in case of complex residue definitions (SANCO/12574/2014): final review and agreement of the EFSA/EURL proposal for the Legal Residue Definition classification (Simple vs. Multicomponent)

EFSA presented its proposal for the implementation of the Commission's working document SANCO/12574/2014 on the summing up of LOQs in case of complex residue definitions.

This proposal classifies the different Residue Definitions (RDs) in MatrixTool into simple or multicomponent according to the analytical method needed to be applied to enforce fully the RD.

EFSA proposed a classification of RDs into SIMPLE or MULTICOMPONENTS:

- SIMPLE: one component is to be analysed/quantified and 1 LOQ should be reported;
- MULTICOMPONENT: more than one component needs to be analysed/quantified and individual LOQs should be reported (without conversion) as well as the sum of LOQs or, alternatively the '99999' code.

EFSA presented the RD classification developed after the first round of MSs consultation during summer 2017.

After the meeting, EFSA will organise a second round of MSs consultation on the proposed classification of RDs into simple or multicomponent. The deadline for commenting was set to the 15th November 2017.

Further guidance on how and in which cases to report the 'summed LOQ' will be given in the EFSA Guidance on the use of the SSD for the 2017 pesticide residues data collection.

Finally, it was indicated that 2017 data collection will be a first attempt to implement SANCO/12574/2014 document. EFSA understands that due to different analytical methods used by MSs to enforce the different types of legal RD, there is no unique solution that fits all situations.

4.8. Monitoring data on background levels of phytogenic sulphur, which mimic the presence of dithiocarbamates in organic samples of certain crops.

In the framework of the MRL review of dithiocarbamates, the existing MRLs for dithiocarbamates will be reconsidered. The European Commission asked EFSA to derive MRL proposals also for crops for which no GAPs are authorised, but for which MRLs >LOQ may be required due to the natural occurrence of compounds mimicking the presence of dithiocarbamates. For setting MRLs for these crops, monitoring data should be used. According to the JMPR methodology, at least 59 samples per commodity/commodity group would be required to derive a MRL proposals.

To identify crops for which sufficient information is available to derive MRL proposals on the basis of monitoring data, EFSA analysed the 2013/2014/2015 monitoring results for organic crops for which the use of DTCs is prohibited. The list will be complemented with the results of 2016 EU monitoring and other data sources, e.g. data that are in hands of the EURLs.

EFSA asked MS to report other available sources of information that can be used for deriving MRL proposals such as specific monitoring programmes from relevant organizations, e.g. organic farmers/companies. The Network participants asked to communicate information within 2 weeks.

Once a complete overview is available, EFSA will inform the European Commission and Member States for which crops additional monitoring data should be generated, preferable in the framework of the national control programmes of 2018. The results of these analyses will be then available to EFSA by August 2019 through the regular pesticide monitoring data collection, before initiating the MRL review (article 12 Reg. 396/2005) of all DTC active substances in December 2019.

EURL experts highlighted that some crops do not contain CS2 but precursor of CS2 (e.g. amino acids, methionine that is the precursor of other sulphur-containing amino acids) and that CS2 is not systematically formed in the plant (phytogenic CS2) but during enzymatic reactions that depend on the analytical conditions, in particular on the room/lab temperature. EFSA mentioned that analytical methods are not obvious for these substances and suggested EURL could make available both the analytical methods and good analytical practices for CS2 and its precursors. Analytical issues and matrix effects were also discussed. A participant confirmed the impact of the room temperature in the enzymatic activity and the need to use natural gloves and not latex ones (source of CS2).

5. The Framework Partnership Agreement on Data Quality and the Data Quality Framework for EFSA Scientific Data Collections

Data Quality assessment is the measure of the level of fitness of data for a specific purpose. Data Quality is required to better fulfil data analysts requests to improve the overall risk assessment in EFSA. In the context of a Framework Partnership Agreement, EFSA (DATA Unit) started to set up the 'Data Quality

Virtuous Cycle' based on 4 main steps: Define, Measure, Analyse, Improve with the final goal of achieving a system which can ensure a continuous improvement in the quality of collected data and, as a consequence, in the robustness of the scientific outputs. This process of data quality improvement has an impact in terms of effort and resources required both at EFSA and national level, highlighting the need of defining a Data Quality Governance Board including all relevant stakeholders. EFSA briefly presented a pilot project, which aims at supporting MSs in improving the quality of their data compared to baseline requirements available in the EU legislation. Currently, the project involves five countries (Cyprus, Denmark, France, Germany and Slovakia) covering the data quality aspects horizontally in four food data domains (zoonoses, pesticides residues, contaminants and additive occurrence and residues of veterinary medicinal products).

The outcome of this pilot will be proposed to EFSA Management and Advisory Forum to get consensus to extend this project to other countries, which will voluntarily decide to improve the quality of their data.

EFSA took the opportunity of the Pesticides Monitoring Network to possibly collect volunteers wishing to join the discussion with the Framework Partnership Agreement countries through teleconferences and a Yammer group (a kind of private blog/social network) dedicated to the topic.

6. Agreements

EFSA with the Network participants agreed on reducing the time for the publication of the Guidance on the use of the SSD for the next data collection in advance compared to the previous year. The finalised draft Guidance will tentatively be ready by 15/11/2017, except for those directions related to legal changes that may happen until the end of 2017. Thus, the final Guidance will be published at the begging of 2018. The same will apply for the new release of the SSD catalogues for the 2017 data coding.

EFSA agreed to continue creating the 'ExcelTool' for the XML files generation for those countries that still are using this supporting tool.

EFSA agreed to make the text of the DCF data validation messages more clear; EFSA will investigate if it will be possible to allocate an ID number to the type of errors returned to each record that failed the data validation.

The list of Business Rules will be made more transparent and their justification will be explained. Possibly, the number of BR applicable for the 2017 data collection will not be increased.

EFSA will investigate the possibility to amend the structure of the MicroStrategy ® Validation Report in order to split it in two sections: the first one (shorter) will be used as Summary Report for checking and accepting the transmitted data in the DataWareHouse and the second one (more detailed) to be used at national level for the preparation and/or publication of the national reporting.

EFSA will consider the Network proposal on the creation of a local engine to be made available as Open Source for all reporting countries and to be used as tool for national data validation before data transmission on the DCF.

A second round of national experts' consultation on the classification of the legal residue definitions for pesticide MRL will be soon launched and comments will be

sent to EFSA by 15/11/2017. Before this deadline, EFSA to make available a textual description of the new approach proposed by EFSA for the classification of the legal residues definition into Simple and Multicomponent.

7. Date and topics' suggestions for the next meetings

EFSA confirmed that the next meetings of the Network will be held in Parma on 24-26 April 2018 and 17-18 October 2018.

8. Conclusions

The Chair thanked all the participants for their contributions to the meeting.

9. Closure of the meeting

The meeting closed at 18:00 as anticipated in the agenda.