

Network on Pesticide Monitoring Minutes of the 19th meeting

Held on 17-18 October 2018, Parma

(Agreed on 12 November 2018)

Participants

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

Country	Name
Austria	Verena SPITELLER
Belgium	Jean-François SCHMIT
Bulgaria	Emil SIMEONOV
Cyprus	Despo Louca CHRISTODOULOU
Cyprus	Olympiada KOUROUZIDOU
Croatia	Anamarija BOKULIC
Croatia	Bozena DEZDJEK
Czech Republic	Petr CUHRA
Czech Republic	Dana NEDVIDKOVA
Denmark	Pernille BJORN PETERSEN
Estonia	Kadi PADUR
Finland	Kati HAKALA
Finland	Carola RANTA
France	Laurence DELAIRE
France	Vincent RIEU
France	Céline VIDAL
Germany	Andrea MALDONADO
Greece	Komninos STOUGIANNIDIS
Hungary	Krisztian VARGA
Ireland	Finbarr O'REGAN
Italy	Roberta ALOI
Malta	Shirley MIFSUD
Latvia	Elina CIEKURE

Lithuania	Virginijus VAICIUNAS
Luxembourg	Fabienne CLABOTS
Netherlands	Henk VAN DER SCHEE
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Romania	Oana STROIE
Slovakia	Jarmila DURCANSKA
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Slovenia	Marjan MARKELJ
Slovenia	Ana RUCNA
Spain	Emma MARTIN DENIA
Sweden	Petra FOHGELBERG
Sweden	David FOSTER
United Kingdom	Helena COOKE
Iceland	Ingibjorg JONSDOTTIR
Norway	Randi Iren BOLLI
Norway	Per BRATTERUD
Norway	Hanne Marit GRAN
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- Observer Experts from non EU countries: Pre-accession or Potential Countries**

Country	Name ¹
Albania	Vjollca VLADI
Bosnia and Herzegovina	Ivana ZOVKO
FYROM	Olivier MILANOV
Kosovo	Naim DEIJAJ
Montenegro	Danijela SUKOVIC
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- EFSA:**

Pesticides Unit:

ANASTASSIADOU Maria (Scientific Officer)

BROCCA Daniela (Scientific Officer, Chair)

MEDINA Paula (Scientific Officer)

TARAZONA José (Head of the Pesticides Unit) (agenda item 10)

¹ Indicate first full name and then surname (John Smith) all throughout the document

Evidence Management Unit:

BOCCA Valentina (Scientific Officer)
CARLETTI Alessandro (Scientific Officer)
DI PIAZZA Giulio (Scientific Officer)
DUJARDIN Bruno (Senior Scientific Officer)
GILSEANAN Mary (Head of the Evidence Management Unit)
IOANNIDOU Sofia (Scientific Officer)
RICHARDSON Jane (Senior Scientific Officer, Team Leader)
RUSSEL Doreen Dolores (Scientific Officer)
SHAHAJ Alban (Trainee as Scientific Officer)
TRIACCHINI Giuseppe (Scientific Officer)

Legal Unit:

VENIER Luisa (Legal Officer) (agenda item 10)

1. Welcome and apologies for absence

The Chair welcomed the participants.

Apologies were received from Maria Joao LINO (Portugal).

2. Declarations of interest

In accordance with EFSA's Policy on Independence and Scientific Decision-Making Processes² and the Decision of the Executive Director on Declarations of Interest³, EFSA screened the Annual Declarations of Interest filled in by the experts invited for the present meeting. No Conflicts of Interest related to the issues discussed in this meeting have been identified during the screening process or at the Oral Declaration of Interest at the beginning of this meeting.

3. Adoption of agenda

The agenda was adopted without changes.

²http://www.efsa.europa.eu/sites/default/files/corporate_publications/files/policy_independence.pdf

³http://www.efsa.europa.eu/sites/default/files/corporate_publications/files/competing_interest_management_17.pdf

4. Agreement of the minutes of the 17th and 18th meetings of the Network on Pesticide Monitoring held in Parma on 12 October 2017 and from 29 to 30 May 2018.

The minutes of the 17th Network on Pesticide Monitoring meeting held in Parma on 12 October 2017 were agreed by written Procedure on 10 November 2017 and are available on the EFSA website. The minutes of the 18th Network on Pesticide Monitoring meeting (special session) held in Parma from 29 to 30 May 2018 were agreed on 17 October 2018; only FR, LT and SE participated in the 18th meeting, i.e. the reporting countries for which SSD2 data transmission special training was needed.

No additional comments were received during the 19th meeting.

5. Topics for discussion

5.1 SSD1: 2017 pesticide monitoring data collection

Status of the 2017 data collection by Giuseppe Triacchini (EFSA)

By 17 October 2018, pesticide residues data related to the 2017 data collection were submitted by 33 European countries: the 28 MS, Norway and Iceland, as well as by 3 pre-accession countries, i.e. Bosnia and Herzegovina, FYROM and Montenegro. No data have become available from Switzerland so far.

In the past eight years the number of analytical determinations reported to EFSA increased from about 14 million in 2009 to about 25.5 million in 2017; thus, a growth of 8% was observed. The number of samples analysed rose from about 68,000 in 2009 (10,500 of EU-coordinated control samples – EUCP) to circa 89,000 in 2017 (13,400 of EUCP samples).

For the first time in 2018, HU, FR, LT, LV and SE submitted information coded according to the new SSD2 sample description, which will become mandatory in 2020 starting from the 2019 monitoring results for all the reporting countries.

The opening dates of the data collection were the 22 May 2018 for the SSD1 coding and the 16 June 2018 for the SSD2 coding. Considering the increasing volume of the new data submitted and the implementation of SSD2, the Commission (EC) agreed to extend the data submission deadline to the 30th of September 2018 (instead of the 31st of August).

Feedback from the MS

The following issues were reported by MS regarding the 2018 submission/validation of the 2017 data:

- Errors linked to the violation of certain business rules (BR) resulted in the rejection of some data. MS suggested receiving a warning instead of an error message in this case (IE, MT, and NL). Some countries stressed that no complete list of the records reported is made available for the same error identified by the BR (the system stops sending feedback when a certain number of records affected by the same errors is exceeded).

Action for improvement: Considering that BR are necessary to ensure the quality of the data, the reporting countries proposed to (i) improve the BR and (ii) better inform the data providers on the most frequent error types. Several actions have already been taken by EFSA towards both (i) and (ii) in the past data collections. For the SSD2 data coding, a new tool was implemented in the FoodEx2 browser - **the interpreting and checking tool (ICT) and the mapping file for the food samples coded description (food item tested and product treatment) - is a useful tool which provides support to identify and interpret coding discrepancies. EFSA was requested (and agreed) to disclose this tool to all the data providers.**

- Updates in the EFSA MRL database referring to older MRL applicable to long-life food products were not included in the MRL database used for the 2017 data validation (CZ, SK, UK).

Action for improvement: EFSA explained that there is a possibility to introduce manually the MRL in the database after the rejection of the records failed the MRL BR checks. Additionally, initiatives are currently under consideration **by EFSA (in collaboration with EC) to improve the EFSA internal MRL database.**

- HR, SK and CZ explained that the difficulties in reporting results for composite foods would result in the loss of valuable information. EFSA clarified that with the implementation of the SSD2 (FoodEx2), composite food will be better coded and described; further, EFSA indicated that with the currently available BR it is not possible to check MRL compliance for processed and composite food. HR and CY proposed to revise these rules in order to allow reporting of processed foods. In particular, CZ proposed to add a new field for processing factor in SSD2 in this respect.

Action for improvement: EFSA informed that currently there is an **on-going project on the compilation of processing factors (EFSA, BfR and RIVM)**, but not all commodities are taken into consideration. However, EFSA reminded that the enforcement of the MRL for

processed and composite food is under the responsibility **of the national authorities**.

- The reporting on the sum of LOQs for multicomponent Residue Definitions (RD) may in some instances cause problems.
 - The NL and IE noted that the summing of LOQs may result in an over-estimation of the consumer's chronic exposure in case of some multicomponent RD.
 - In a multicomponent RD the complete summing of LOQs is not achieved if at least one of them is missing (CY).

Action for improvement: CY, IE, and the NL proposed to follow the EURL's proposal and - instead of summing up the LOQ – to provide EFSA with the LOQ per each individual component; EFSA recalled that the provisions in the SANCO document on the sum-LOQ already give this opportunity. EFSA's proposal to the experts was to report '99999' and then the LOQ per each individual component (see agenda item 5.3).

- The UK data submission to EFSA is based on data submitted by several labs. In case of data rejection because of BR violation, the identified errors are not managed by the respective laboratories and this may raise issues in data processing and correction at national level.
- Proposal for **additional SSD codes for specific substances (paramCodes) and food commodities (prodCodes) to be integrated in the annual revision of the SSD catalogues and then in the MatrixTool** have been made by some countries (BE, NL).

Action has already been taken by EFSA in this respect following also proposals proactively submitted by AT, CY, CZ and the NL in advance of the meeting.

5.2 SSD1: short review of EFSA Guidance on the use of the SSD1, SSD catalogues and Business Rules for the 2018 pesticide residues data collection by Maria Anastassiadou (EFSA)

EFSA informed that the guidance and catalogues/documents related to the 2018 pesticide residues data collection (in SSD1 format) will be updated in line with (i) new updates of RD in Reg. (EC) No 396/2005, (ii) additions of a few food commodities codes and (iii) revision/introduction of new BR (e.g. the summing of LOQs on multicomponent RD).

Updates in Reg. (EC) No 396/2005 include new RD (e.g. omethoate, isofetamid), RD updates for all commodities (e.g. acrinanthrin, dimethoate, and lufenuron), and updates in RD for certain commodities

(e.g. chlorpyrifos-methyl, metalaxyl, 2-phenylphenol, thiabendazole). Proposals on paramCode updates were also sent by AT, CY, CZ and the NL in advance of the meeting.

For complex RD, additional paramCodes will be allocated for each single component, as appropriate.

The annual revision of the MATRIX catalogue will incorporate additional commodities (sub-commodities), reflecting the imported food listing in the latest amendments of Reg. (EC) No 669/2009 (i.e. goji berries, yardlong beans, bitter melon and Chinese broccoli).

A number of additional proposals for improvement of the PARAM catalogue and the MatrixTool were sent by AT (e.g. proposal to report in a new, separate MatrixTool table those parameters for which no EU MRL apply, but are related to safeners and synergists).

AT also suggested actions for improving the guidance on SSD1 data reporting, some of them of editorial nature (to be considered in the new revision), some others more essential, mostly related to the reference to the supporting documents/tools used by data providers. Some of these comments will be taken into account in the new guidance document on SSD2, considering that 2018 is the last year where results are reported in SSD1 format.

Additional BR to be considered from the 2018 data collection will be introduced by EFSA (e.g. LOQ sum-up). AT did additional proposals which will be taken into consideration by EFSA (e.g. report MRL in a way that the result is taken from the reported legal limit and not from the MRL database).

Relevant actions will be taken by EFSA to improve the above documents. Some of them may take some time to be implemented considering the work currently in progress on the new SSD2 coding and the preparation of the related guidance document and tools, as well as the harmonised chemical reporting guidelines. At the moment, EFSA will not change the structure of the MatrixTool by e.g. adding a new Table.

MS were invited to send additional comments to EFSA on this topic by 2 November 2018.

5.3 Implementing the summing of the LOQs SANCO working document by Paula Medina (EFSA)

EFSA presented the outcome of the first year of the implementation of the provisions laid down in the SANCO working document on the summing of the LOQs. The document addresses a common approach for reporting the

LOQ result in the case of multicomponent/complex RD, where each individual component is measured separately. According to this document, a list of single components has been drawn by EFSA and for each one of them a paramCode has been allocated. To identify which components belong to which RD, hierarchical links have been established by EFSA and listed in a mapping file. This information has been presented by EFSA during the meeting.

A specific example on the estimation of the sum of LOQs for aldicarb (sum of aldicarb, its sulfoxide and its sulfone, expressed as aldicarb) was explained.

Following the identification of each single component in a RD, a data provider may choose to report the LOQ for the full/summed legal RD, i.e. paramType=P005A (sample analysed according to full residue definition), by (i) using the analytically determined LOQs (as described above), or (ii) reporting the '99999' value, which will trigger the calculation of the sum-LOQ by EFSA. In both cases, the individual LOQ per single component needs to be provided, i.e. paramType=P002A ('part of a sum').

During the first year of implementation of the Commission's document on the summing up of LOQs in case of complex RD (2017 monitoring data), shortcomings were identified by EFSA due to wrongly reported information, i.e. 4 or 6 nines instead of 5, or the lack of information on the LOQs of the individual substances coded with paramType=P002A ('part of a sum'). To make the best use of the wrongly reported data in the frame of the 2017 monitoring data collection, EFSA may consider replacing the LOQ sum with a 'default' value of 0.01 mg/kg in case a MS failed to report individual LOQs for a specific analytical result or if a typo was introduced when the value '99999' was reported.

For the next year data collection (2018 monitoring data), EFSA invited the experts to pay attention when reporting the '5 nine' code for the sum of LOQs (to avoid mistakes in typing the correct number of figures). Furthermore, **EFSA will set-up new BR for the implementation of the summing of the LOQs in order to improve the quality of the 2018 monitoring data stored in the EFSA DataWareHosue (DWH).**

The meeting participants requested EFSA to provide after the meeting each reporting country with the full list of miscoded sum-LOQ in order to better follow-up on the mistakes done and to avoid them during the next data collection. EFSA agreed on this proposal. MS were invited to review the mapping file with hierarchical links providing further components used to enforce the RD and send comments to EFSA on this topic by 2 November 2018.

5.4 SSD2: changes in the data elements from SSD1 to SSD2 by Daniela Brocca (EFSA)

Similar to the SSD1 model, the SSD2 incorporates data element definition and structure, controlled terminologies ('catalogues') and BR to ensure a coherent level of information reported across countries and plausibility/validity of the information provided.

Moving from SSD1, the most important change in data elements is represented by the new SSD2 'aggregated' *sampMatCode* variable, which describes in full the food sample tested. Thus, the *sampMatCode* incorporates the SSD1 *prodCode*, *prodTreat* and *prodProdMeth*, plus *prodPack* and *prodIgred*.

EFSA informed on the documents already available for SSD2:

- SSD2 description and Guidance document:

<https://www.efsa.europa.eu/en/efsajournal/pub/3424>

- EFSA SSD catalogue browser user Guide:

<https://doi.org/10.5281/zenodo.1407102>

- Link for downloading the Catalogue browser:

<https://github.com/openefsa/catalogue-browser/wiki>

- EFSA Guidance on the food classification and description system FoodEx2 (revision 2, 2015):

<https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/sp.efsa.2015.EN-804>

An EFSA Guidance document on the use of the SSD2 specific for the reporting of the 2018 pesticide monitoring data will not be issued; however, a working document on the subject will be drafted by EFSA. This document will address the coding of cases specific to the pesticide residues data collection and will not replace the general EFSA Guidance on SSD2 (see above). As soon this document will be ready, it will be circulated for commenting to all reporting countries.

FR, HU, LV, LT and SE already reported their results in SSD2 format for the 2017 pesticide monitoring data collection, while all other countries remained loyal to SSD1.

National experts from nine countries (DE, DK, FR, FI, HU, LT, LV, NL and SE) informed that will report their 2018 data in SSD2 format, while the experts from eleven countries (CZ, IE, GR, ES, HR, LU, NO, SI, SK, UK

and RO) informed that they will still report their 2018 data in SSD1 format.

Experts from AT, BE, BG, CY, EE, IT, MT and PT will still need to decide on the reporting format for next data collection. BE indicated that its decision on the SSD format to code the 2019 data will depend on the timely availability of the SSD2 tools (in particular the macro xls allowing the creation of xml file).

5.5 SSD2: FoodEx2 browser, coding, hierarchies and constraints by Daniela Brocca (EFSA)

FoodEx2 is a comprehensive food classification and description system developed by EFSA; it is to be used to code monitoring data in SSD2 format to describe in full food samples tested. FoodEx2's main elements are its hierarchies - incorporating 21 food groups in total, and facets (32 descriptors), providing information on a particular aspect of a food (e.g. food source, process, ingredients, etc.)

EFSA invited the experts to download and install (if not done already) the FoodEx2 catalogue browser in their PC from the dedicated EFSA webpage. Then the browser was explored on site and the several questions raised were addressed during the first and second day of the meeting.

Going through the browser, EFSA explained that the 'Exposure' hierarchy, used for the purpose of this meeting, will be amended for the reporting of the 2018 monitoring data; thus, a new food hierarchy – which will also include feed terms - will be created by EFSA and implemented in the FoodEx2 browser. EFSA will inform **all national experts when the new hierarchy to be used for the 2018 pesticide monitoring data collection will be ready for implementation.**

EFSA explained the meaning of the different symbols displayed in the FoodEx2 browser tool; the blue pyramids correspond to codes/term assigned to generic food groups (e.g. 'fruits' and 'fruit products') and they should not be selected; EFSA indicated that more specific food items than these pyramids should be selected, ideally the FoodEx2 codes associated to green circles should be picked-up. More we move closer to the green circle, more detailed and specific is the food description, e.g. selecting the FoodEx2 code for bitter oranges would be better than to choose the code set for oranges; the code available for goji berries is preferable to the tomatoes code.

The MS commented on the codes used FoodEx2, being different than the ones in Reg. (EC) No 396/2005. EFSA explained that under Regulation 396/2005 only unprocessed commodities are described, while FoodEx2 also addresses the processed (and composite food). Furthermore,

FoodEx2 reflects the general and extended EC food classification and coding contained in both Part A and Part B of Commission Regulation on Food Classification for pesticide MRL (annex I of Regulation (EC) No 396/2005); these codes are available in the 'implicit attributes' window of the FoodEx2 browser, where applicable (i.e. for unprocessed food).

EFSA informed that a fully-automatic mapping of raw and primary processed commodities reported in FoodEx2 against MATRIX and PRODTR (if relevant) is possible. Reporting of the detailed description of composite food with SSD2 is also possible (this was not the case in SSD1). As for SSD1, with SSD2 the data provider has also the possibility to provide additional information on the food tested by reporting the full textual sample description in the E.03 SSD2 free text data element. In fact, the SSD2 format allows the reporting of more detailed coded information than the current SSD1 format. Finally, the FoodEx2 coding is also used in the EFSA Comprehensive European Food Consumption database, which will allow for a more accurate estimation of the consumer's exposure to pesticide residues in the future.

5.6 SSD2: FoodEx2 validation process and link to the pesticide MATRIX coding *by Valentina Bocca and Giulio di Piazza (EFSA)*

Two data environment/areas were made available in the Data Collection Framework (DCF) for the loading of the 2017 data on pesticide monitoring. For the 2018 data collection, countries reporting in SSD1 format will load their inputs in the area 'MOPER_WF2.PPP_2018'. Countries reporting in SSD2 format, will introduce their inputs in 'MOPER_SSD2_WF2.PPP_2018'. **The SSD2 data collection will be open from 15.05.2019 to 31.08.2019.**

The SSD2 data validation process through the BR involves mapping the FoodEx2 codes to the corresponding MATRIX codes. As requested by the Network, **after the meeting the mapping used by EFSA for the above 2017 data format conversion will be distributed to all reporting countries for comments.**

Once validated and submitted, the monitoring data are automatically uploaded to the EFSA data repository (DWH). Considering that the 2018 and 2019 data collections will still be possible in SSD1, all SSD2 data will be transformed to SSD1 format before storage in the DWH; the latter transformation was also applied in the 2017 validation reports which, for reasons of consistency, will be also available in SSD1 format.

For the mapping from FoodEx2 to the corresponding SSD1:

- Reported source-commodity codes will be 'translated' to the corresponding 'PxxxxxxxxA' of the MATRIX catalogue or the 'Pxxxxxxxx-xxxB' prodCodes of the MATRIX catalogue in cases where meat samples have tested for the muscle only ('excluding visible fat').
- Process facets are 'translated' to product treatment (PRODTR) in SSD1. When process facets are not reported, the commodity is assumed to be as 'unprocessed'. Exceptions: a) 'Baby food' samples are always recoded to 'processed' and b) Dried (dehydrated) 'pulses (dried legume seeds)', 'spices' and 'tea and infusions' are considered as 'unprocessed'.
- For the method of food production the FoodEx2 PROD facet is 'translated' to PRODMD in SSD1. When the PROD facet is not explicitly reported, the mapping translates it into 'non organic production'.
- For packaging material the FoodEx2 PACKMAT facet will be 'translated' to PRODPAC in SSD1.

5.7 SSD2: 2017 pesticide monitoring data collection - first experience feedback from MS and EFSA

The experts from the five countries having used SSD2 format for the 2017 data coding (i.e. HU, FR, LT, LV and SE) expressed their views on their experience.

LT was satisfied with the SSD format.

FR developed its own mapping tool for SSD2, which is only available in French and therefore cannot be used by other countries that may be interested. FR asked whether EFSA intends to include the FoodEx2 codes in the MatrixTool. EFSA clarified that since the MatrixTool covers only unprocessed commodities, i.e. it does not address the product treatment codes, FoodEx2 coding in the MatrixTool is not necessary.

SE reported the challenges faced in using the SSD2 format and indicated that that crucial point in implementing the SSD2 is an appropriate mapping. SE also indicated that the SSD catalogue updates in the course of the data collection posed an additional challenge and suggested EFSA to avoid such changes.

EFSA took note of the various shortcomings identified by the MS and will consider them for enhancing the SSD2 reporting.

5.8 Roundtable on SSD2 knowledge and experience at national level

Feedback on SSD2 was also given by experts from other MS, who have not yet reported results in SSD2 format but have experienced the catalogue browser or followed the SSD2 training organised by EFSA.

MS's feedback was received on e.g. the fact that the SSD2 food categorisation is not always relevant to the raw commodities assessed for the presence of pesticide residues. Additionally, MS questioned whether composite and processed foods could be described in more than one way in SSD2; if this would be the case, it would create inconsistency in the various results reported by the MS. The latter however is not an option because the food categorisation, as conceived, does not allow multiple commodity description possibilities.

To ensure that the different comments and proposals on SSD2 coding are addressed in a common and consistent way, DE proposed to **create a common communication platform to share experience and proposals for improvement**. EFSA will check this possibility and send appropriate feedback.

The expert from KS asked on the **possibility of additional physical training on SSD2**. This would be also relevant for all other pre-accession countries. The proposal will be checked and feedback will be sent.

5.9 Open discussion and questions on SSD2/FoodEx2 by Sofia Ioannidou and Alban Shahaj (EFSA)

EFSA experts on SSD2/FoodEx2 provided several examples on how to use the FoodEx2 and replied to the questions of the Network. The Interpreting and Checking Tool (ICT) was also presented. This is an MS Excel based application, which allows the translation of the FoodEx2 codes assigned by the users. Its aim is to assist users to perform a quality control of the FoodEx2 codes they selected before submitting their data to EFSA.

BE asked whether information on specific commodities (e.g. goji berries) will become available when using SSD2. EFSA informed that a specific code for this commodity will be available for the 2018 data collection in both SSD1 (MATRIX catalogue) and SSD2 (FoodEx2).

Another expert asked whether there was possibility to double-check and export the information encoded in the FoodEx2. EFSA confirmed it and also suggested how to check this information and keep track of the codes updates using Excel files outside the browser before data submission to EFSA.

CZ asked if additions to the FoodEx2 browser related to a specific food product (e.g. a local product) can be requested. EFSA replied that this is generally possible for new raw commodities. This however cannot apply for composite foods (i.e. 'dishes') in case different recipes of the same dish are used in the different countries. As a general rule, if a country wishes to report a specific composite food/dish this can be done by using the appropriate SSD2 facets in the tool (i.e. the 'ingredients' facet).

An expert spotted that the MATRIX code for tea leaves is not available in the FoodEx2 Exposure hierarchy. EFSA kindly requested all MS to gather and report additional, possible missing codes or shortcoming identified in the FoodEx2.

CZ expressed the need to introduce processing factors in the catalogue. EFSA informed that currently the reporting of processing factors is not foreseen, but that in the future this could be possible.

Currently, the MS should focus on the facets related to source, source commodities, ingredients and the production process when coding their samples in SSD2. However, the 'production method' facet is also very important as it is relevant for flagging organic crops. The facet on 'part-consumed-analysed' is instead relevant for reporting the meat muscle samples, without trimmable fat.

DE asked whether the FoodEx2 could be translated in different languages, so that each country selects the appropriate codes in its own language. EFSA replied that this is a quite complex operation since the tool needs constant updates and would request additional resources. However, EFSA will investigate if this will be possible for the future.

5.10 SSD2 coding: EFSA proposal for Harmonised Chemical Residues Reporting Guideline by Jane Richardson (EFSA)

EFSA informed the Network on the draft document on the harmonised chemical reporting, which will be meant for pesticides, contaminants and veterinary drugs residues in food. According to this document, future monitoring data from these three areas will be reported using the SSD2. The aim of this initiative is to unify the reporting from MS in different food domains, to anticipate and solve potential differences in data coding in the different food areas and allow a more holistic assessment of specific hazards of concern for EFSA. EFSA clarified that these guidelines will not be applicable for the reporting of the 2018 pesticide monitoring data.

EFSA has also drafted new harmonised BR to be applied in the future for the reporting of the above chemicals' residues; these were shortly

presented by EFSA during the meeting. The most relevant harmonised BR relevant to the pesticide area will cover the following:

- 'Fat weight': a warning will be added to inform that this is only mandatory for contaminants residues and only optional for other chemical residues areas.
- MRL and MatrixTool checks: the approach already used in the pesticide monitoring area will be proposed for extension to other chemical residues areas.
- ParamType harmonisation: the proposal is to apply the rules currently in use for the pesticides' residues reporting to other areas.
- Measurement unit harmonisation.
- Qualitative value harmonisation.

EFSA acknowledged that although harmonised BR will be introduced for monitoring activities linked to Reg. (EC) No 669/2009 (dealing with all chemical residues sectors), specific rules will apply for each food area.

It was stressed that certain commodity treatments (e.g. 'dehydration') may be considered processed for one area and unprocessed for another one (e.g. pesticides vs contaminants). This will be taken into consideration when reporting results in each respective area.

The next steps of this process will involve the preparation of a harmonised set of BR in XML format, which will be tested by EFSA using valid files from different domains.

SE acknowledged the harmonisation initiative and would like to discuss, exchange further ideas on this topic.

6. 2016 EU Report on Pesticide Residues: main results and discussion on the increased frequency of MRL exceedances by Maria Anastassiadou (EFSA)

EFSA presented the main results reported in the 2016 EU Report on Pesticide Residues in food and feed, which was published the 25 July 2018. In 2016 84,657 food samples were tested for pesticide residues (791 different pesticides). In the frame of the 2016 EUCP, the overall MRL exceedance rate increased from 0.9% in 2013 to 1.7%, whereas in the national programme the overall MRL exceedance rate increased from 2.8% in 2015 to 3.8% in 2016.

In the EUCP, the increased number of MRL exceedances mainly concern chlorpyrifos for which the MRLs were lowered for many commodities in 2016 following an EFSA reasoned opinion. Exceedances of dimethoate MRLs were

attributed to the intensified controls in France of tomatoes produced in the Mayotte oversea territory. A number of MRL exceedances for non-approved substances in domestically produced samples in the EU were also reported.

The increase in the MRL exceedance rate in the national control programmes was mainly attributed to residues of chlorate, which have been reported to EFSA for the first time under the pesticide residue monitoring data collection following the start of discussions triggered by the European Commission on amended MRL.

Overall, 122 pesticides were assessed for acute risk with a deterministic dietary exposure approach. EFSA concluded that the probability of being exposed to measured pesticide residues, which exceeded the concentrations that may lead to negative health effects, was low.

The estimation of chronic exposure to pesticide residues took into account all unprocessed food products for which residue data on the pesticides covered by the EUCP were reported. EFSA concluded that according to the current scientific knowledge, the long-term dietary exposure to pesticides covered by the 2016 EUCP was unlikely to pose a health risk to consumers.

In the EFSA report (available [here](#)) a series of recommendations were proposed; these have been shortly presented during the meeting.

IE commented the difficulty to develop a fit-for-purpose method for the determination of dithiocarbamates allowing the differentiation of the actual single dithiocarbamate applied in the field as well as to distinguish the contribution of the untreated (blank) commodity to the total CS₂ reported.

Regarding the need to report LODs in the data collection, IE stressed that the LOD validation is not a straightforward process and further guidance will be needed towards this direction.

Finally, NO stressed the need to address pesticide cumulative risk in the future EU Reports on Pesticide Residues.

7. Data Quality Assessment in the context of the DAT Framework Partnership Agreement by Alessandro Carletti (EFSA)

To ensure the quality of the pesticide monitoring data, quality assessment is deemed necessary. For pesticide residues data collection run in 2017 (2016 monitoring data) quality key performance indicators (KPIs) have been implemented and calculated by EFSA:

- Accuracy KPIs (are data correctly representing the real world values for which they are designed?): LOQ accuracy, result value accuracy, product treatment accuracy, type of legal limit accuracy.

- Completeness KPIs (is the information reported in data comprehensive? Is it missing valuable data elements?): EUCP combination, EUCP samples, action taken reported, fat % in milk, fat % in eggs.
- Consistency KPIs (are different pieces of information providing non-conflicting details about a specific data element?): result type consistency, result evaluation consistency.
- Timeliness KPIs (are data available, controlled and sufficiently up-to-date for the task at hand?): timely submission, timely confirmation.
- Uniqueness KPIs (is each data record reported only once in the DB? Is a unique identifier for each data record available?): uniqueness
- Validity KPIs (are data elements conformed to the syntax (format, type, range) of their definitions? Are logical constraints among data elements respected?): not covered yet.

To further improve the quality assessment, EFSA currently aims for validity KPIs. There are additional initiatives for clear rules on how to send data, by when, and how to perform data confirmation. This first Data Quality assessment exercise, though in pilot mode, already allowed to detect some data issues and to put in place cleansing actions.

8. EFSA Baby Food Opinion by Bruno Dujardin (EFSA)

EFSA presented the main elements covered, assessed and presented in the recent Baby Food scientific opinion issued by EFSA. All relevant information is available on the following link:

<https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2018.5286>

9. EFSA proposal for a merged scientific EFSA Network on Chemical Monitoring by Doreen Russell, EFSA

EFSA presented its initiative to create a new, single EFSA scientific Network on chemical monitoring data by merging the currently existing networks on chemical occurrence data, pesticide monitoring data and veterinary medicinal product residue data. Furthermore, EFSA informed the Network that the draft Terms of Reference (ToR) of the new Network were already presented and discussed at the 68th EFSA Advisory Forum meeting on 7 June 2018, where they were favourably received; the 3 affected Networks (including the Pesticide Monitoring Network) were also consulted during the summer 2018 to seek their comments on this EFSA initiative.

BE was among the MS which expressed concerns about the merging of the three networks. BE was particularly concerned with respect to the loss of

expertise/efficiency that could result from the merging of the existing networks (i.e. meeting with a large number of participants or participants, who are not experts in all topics). NO was among the MS which shared the above concerns and stressed that the pesticide network is not only about data collection but also about data monitoring.

Overall, the Network considered essential that – once the new Network will be created – break-down meeting sessions/discussions on pesticides will take place in order to discuss topics concerning scientific and practical matters specific in the pesticide area such as sampling, residue analysis, and cumulative risk assessment but also cross-regulation topics like residues occurring in baby food.

Considering the exchanges of views during the meeting the Network concluded on the following:

- To address technical/scientific issues specific to pesticide residues, separate break-down sessions are strongly envisaged in connection with the main meeting of the new Network. In this respect, task forces could also be created on specific matters.
- To ensure proper discussion and representation of the different MS organisations responsible for contaminants, pesticides and VMPR, up to 3 experts per MS will be able to attend each meeting. Meeting agendas will be prepared well in advance providing enough detail to enable MSs to identify who is/are the appropriate person(s) to attend the meeting. The creation of a new role of a 'Reporting Officer' at national level can also be envisaged.
- EFSA can effectively run such a large network considering its experience in organising large joint network meetings in the past. A large meeting room has already been booked for first meeting.
- A single reporting model (SSD2) with harmonised BRs and catalogues will be used by the merged network.
- Despite the use of a single data model (SSD2) with harmonised BRs and catalogues, data can continue to be sent from different organisations/laboratories at country level. There will be no need to establish a single point per MS for sending data to EFSA.

EFSA will share the outcome of the consultation with all networks.

The amended ToR, which will be prepared on the basis of the comments received in the context of the consultation of the 3 Networks, will be presented at the 70th meeting of the Advisory Forum on 28-29 November 2018. The first meeting of the new Chemical Monitoring Network will be held in week commencing 25 March 2019 (precise dates & timings to be confirmed).

10. Pro-active national monitoring data disclosure: pesticide monitoring results and EFSA proposed approach *by Jane Richardson, EFSA*

EFSA presented the open data approach detailed in the draft technical report on the 'Publication of scientific data from EU coordinated monitoring programmes and surveys', to be published by the end of 2018. The report is in line with the EFSA's objective to widen EFSA's evidence base and optimise access to its data. Thus, data ownership, confidentiality and security issues will be taken into account before data publishing.

According to the draft report, the disclosure of national monitoring data should be:

- **Timely:** citable and persistent at the point of publication of a scientific output.
- **Comprehensive:** published at the lowest level of detail, but without including (i) special descriptors (e.g. the area of origin of the product), (ii) identifiers from registers which may be linked to individuals or premises (e.g. the national identifier of a national laboratory code), (iii) free text fields and (iv) personal data as defined in Regulation (EC) No 45/2001.
- **Comparable and interoperable:** to ensure semantic interoperability, the naming convention and data type for each variable should conform to the published structural metadata.
- **Accessible and usable:** Datasets published by EFSA will be published in Knowledge Junction with descriptive metadata as described in (Richardson *et al* (2017) <http://doi.org/10.5281/zenodo.889742>

Additionally, they should be published with [Creative Commons Attribution License 4.0 BY](#) or similar unrestrictive license.

To improve governance and citizen engagement, structural metadata will be publically available and maintained according to the data governance framework. A functional e-mail address will be included in the metadata to allow user feedback. It is recommended to track reuse of data in order to measure and enhance the value of published data.

The recommendations put forward in the EFSA Report regarding the disclosure of scientific data from monitoring programmes and surveys are the following:

- EFSA should proceed with the scheduling of the publication of data from the DWH according to the process described once the above report is endorsed.
- Any new data collections submitted to EFSA and stored in the DWH should follow the proactive process for publishing scientific data described in the above report.

- The report describes the minimum open data requirements, but competent authorities should develop further these approaches to improve data access.
- Regional, national and European open data portals and a coordinated approach to open data activities should be promoted.
- The approach to proactive publication of scientific data should be reviewed as open food safety data reaches maturity.

Following the circulation of the above draft report for endorsement only two national organisations expressed reservations, which were further discussed by the Network during the meeting.

One Member State was surprised to see at the beginning of August that the 2016 control data were published on the Internet even though they contained information enabling laboratories to be identified. EFSA confirmed that the data allowing the identification of the laboratories will not be published and apologised for the unintentional mistake made during the summer, which was promptly corrected.

Triggered by the MS's comments, EFSA clarified the difference between open data access (proactive publication) and requests for access to documents (reactive disclosure), the latter being regulated by Regulation (EC) No 1049/2001 on public access to documents⁴ (hereinafter '*the PAD Regulation*).

In the case of PAD request, reference was made to Article 16 of the PAD Regulation according to which the PAD Regulation is without prejudice to any existing rules on copyright which may limit a third party's right to reproduce or exploit released documents.

MS considered important to know who access the pro-actively published data and how he/she intends to use them. MS proposed to add a disclaimer on the data publication platform to anticipate the partial use of data. The Network also suggested attaching a questionnaire to be filled in by the person accessing the data; this would allow to retrieve feedback and to collect information on the data requestor and/or on the potential use of the pesticide monitoring data.

EFSA acknowledged the importance of the above proposals put forward by MS and agreed to account for them before full data disclosure will be made on the results of the pesticide monitoring data.

The Network agreed on the EFSA approach for pro-active data disclosure as long as the above proposals will be investigated and implemented and those proactive publications will concern the pesticide monitoring data, not necessarily data from other food domains.

⁴ Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, OJ L 145, 31.5.2001, p. 43-48, applicable to EFSA.

EFSA confirmed that will follow-up on the above disclaimer and questionnaire issues directly with the proposing countries.

After having addressed the above, the currently restricted access to the pesticides 2016 monitoring data on the Zenodo platform will be turned into public access.

11. AOB

MT asked to the national experts' advice on which MRL should be used in case the legal limit has changed between the sampling date and the date of analysis. The experts indicated that recently new, 'transitional' MRL provisions have been put in place; before this change, the MRL applicable at the date of production of the food tested was the one to be used to check the sample conformity, while nowadays the MRL to be enforced is the one applicable on the date of sampling.

12. Date of the next meetings

EFSA confirmed that the next meeting of the Network will be held in Parma end of March 2019 (in the week commencing 25 March 2019, but only for two days). This is going to be the 1st meeting of the (new) Network on Chemical Monitoring following the merging of the three existing networks on pesticide residues, veterinary drug residues and contaminants. It is proposed that a common session will take place for the three areas during one of the two days of the meeting; this will enable a joint discussion on common topics for the data coding and data reporting in the three data collection domains. Detailed information on the logistic and agenda will follow.

13. Conclusions

The Network concluded and agreed on the following:

- **2018 pesticide monitoring data collection** – MS requests for 1) new/amended SSD codes (in particular PARAM codes), 2) updates of the Guidance Document on the use of the SSD for the 2018 pesticide monitoring data collection and 3) revision/changes of the Business Rules will be sent by e-mail to Maria.ANASTASSIAOU@efsa.europa.eu by **02/11/2018**; background material presented at the meeting is available at: <https://dms.efsa.europa.eu/otcs/llisapi.dll/link/19967028> and <https://dms.efsa.europa.eu/otcs/llisapi.dll/link/19998718>
- **Handling the sum-LOQ for multi-components residue definitions** – MS inputs on the EFSA proposal for 1) handling the (mis)reported 2017 data

sum-LOQ, the EFSA listing of the multi-components residue definitions and their mapping to the single paramCodes/Molecular Weight Factors (Excel file) and 3) 2018 monitoring data Business Rules will be sent by e-mail to Paula.MEDINA@efsa.europa.eu by 02/11/2018; background material presented at the meeting is available at:
<https://dms.efsa.europa.eu/otcs/llisapi.dll/link/19967935>

- **Future Business Rules for a Harmonised data collection on Chemical Residues** – MS comments on the EFSA proposal can be posted at the following Jive platform at <https://efsa.jiveon.com/community/veterinary-medicinal-product-residues-data-collection/blog/2018/10/19/towards-harmonised-business-rules>, preferably by 15/11/2018; it is recalled that this set of Business Rules will not apply for the 2018 pesticide residues monitoring data validation. Background info presented at the meeting: <https://dms.efsa.europa.eu/otcs/llisapi.dll/link/20000697>
- **EFSA Open Data and pesticide monitoring data pro-active publication** in Zenodo Knowledge Junction - Before proceeding with the proactive pesticide monitoring raw data publication, EFSA will come back to the MS and address their proposals to introduce a disclaimer and the on-line survey to be requested to fill-in by the person accessing the data.
- **EFSA proposal for a new scientific Network on Chemical Monitoring** - The ToR proposed by EFSA will be amended according to the comments provided by the members of the 3 concerned EFSA Networks (Network on chemical occurrence, pesticide monitoring and veterinary medicinal product residues) and then will be presented at the next meeting of the Advisory Forum (28-29 November 2018).
- The **first meeting of the new Chemical Monitoring Network** will be held in Parma in the week commencing 25 March 2019 (precise dates & timings to be confirmed).

14. Closure of the meeting