Network on Pesticide Monitoring
Minutes of the 9th meeting
Held on 10-11 April 2013, Parma
(Agreed by written procedures on 10 May 2013)

Participants

- Network Representatives of Member States:

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<th>Country</th>
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<tr>
<td>Austria</td>
<td>Roland Grossgut</td>
<td>Latvia</td>
<td>Guntis Cepurnieks</td>
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<td>Belgium</td>
<td>Jean-François Schmit</td>
<td>Lithuania</td>
<td>Snieguole Ščeponavičienė</td>
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<td>Bulgaria</td>
<td>Lyubina Donkova</td>
<td>Luxembourg</td>
<td>Fabienne Clabots</td>
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<td>Cyprus</td>
<td>Popi Ziegler</td>
<td>Malta</td>
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<td>Czech Republic</td>
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<td>Netherlands</td>
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<td>Denmark</td>
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<td>Poland</td>
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<td>Estonia</td>
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<td>Aleksandra Jug</td>
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<td>Anne Katrin</td>
<td>Spain</td>
<td>Alicia Yagüe Martín</td>
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<td>Hungary</td>
<td>István Buzás</td>
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<td>Sweden</td>
<td>Anders Jansson</td>
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<td>Italy</td>
<td>Roberta Aloi</td>
<td>United Kingdom</td>
<td>Helena Cooke</td>
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- European Commission representatives:
  - Almut Bitterhof (DG SANCO - Unit E3) (via phone)
  - Veerle Vanheusden (DG SANCO - Unit E3) (via phone)
  - Georgios Balkamos (DG SANCO - Unit E5) (via phone)
  - Luca Battistini (DG SANCO - Unit E5) (via phone)
  - Michelangelo Anastassiades (EURL-SRM)
  - Carmen Ferrer (EURL-FV)

- EFSA:
  - Pesticide Unit (Daniela Brocca (chair) and Paula Medina)
- Dietary and Chemical Monitoring Unit (Stefano Cappè and Giuseppe Triacchini)
- Legal and Regulatory Affairs Unit (Claus Reunis)
- Corser Unit (Carolina Di Bona)

- **Others (EFTA country representatives)**
  - Ingibjörg Jónsdóttir (Iceland)
  - Per Bratterud and Lise Gunn Skretteberg (Norway)

### 1. Welcome and apologies for absence
The Chair welcomed the participants. Apologies were received from Evangelos Andreou/Greece for not attending the meeting. Further apologies were received from Commission colleagues; a phone conference was arranged for the afternoon section of the first day of the meeting to allow four Commission representatives (Unit E3 and E5) to participate to the discussion covering selected agenda points (items 5.5, 5.6, 6.2 and 6.3).

### 2. Adoption of agenda
The agenda was adopted without changes. In addition, the NG asked to provide an update on the DDAC/BAC data collection and to clarify an issue regarding the EU MRL set for methomyl/watermelon.

### 3. Declarations of interest
In accordance with EFSA’s Policy on Independence and Scientific Decision-Making Processes regarding Declarations of Interests (DoIs)¹ and the Decision of the Executive Director implementing this Policy², members of networks, peer review meetings, networking meetings and their alternates shall be invited to complete and submit an Annual Declaration of interest (ADoI).

EFSA screened the ADoI filled in by the experts invited for the present meeting. No conflicts of interests related to the issues discussed in this meeting have been identified during the screening process or at the Oral Declaration of interest (ODoI) at the beginning of this meeting.

No additional declarations were made at the beginning of the meeting.

### 4. Agreement of the minutes of the 8th meeting of the Network on Pesticide Monitoring held on 23-24 October 2012, Parma.
EFSA informed that the minutes were agreed by written procedures on 30 November 2012 and published on the EFSA website on 18 December 2012.

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5. Topics for discussion

5.1 Disclosure of national pesticide monitoring data to external stakeholders: national data access policies and EFSA Data Warehouse (DWH) Access policy.

EFSA is in the process of developing a Data Warehouse (DWH) that will allow the publication, analysis and distribution, in different formats and at different level of granularity, of data collected by EFSA (including the pesticide monitoring data). In order to regulate the access to the information that EFSA will made available in the DWH, EFSA has drafted the DWH Access Policy and launched a consultation on this document among the national experts. EFSA gave a presentation on the draft Guidance and presented the comments received by the national experts in the pesticide area. The NG recognised the need to have in place a common policy on data protection/disclosure and agreed on the draft EFSA policy; however, some national experts considered that this policy and the levels of aggregation cannot be formally agreed by the NG and should be further discussed and voted at the SCoFCAH (pesticide residue section) and - possibly - also in other sections of the SCoFCAH that deal with all food domains covered by the draft EFSA policy (e.g. zoonoses. contaminants, etc.). Finally, in order to ease their work, EFSA and MS expressed their wish to see reported also in the EU legislation a reference to the common policy that will be adopted at the SCoFCAH.

In addition, EFSA organised a survey (in form of questionnaire) aimed to collect some essential information in all the reporting countries regarding the existing national policies on data property and copyright and to gain knowledge on the national legal frameworks in terms of data ownership, data confidentiality and accessibility. A total of 20 questionnaires were returned to EFSA, each with answers to the 34 questions; in the NG meeting the answers were presented and the topics discussed.

The meeting participants welcomed this first discussion on a common policy on data ownership/disclosure. The largest majority of MS already received requests for data disclosure and already disclosed pesticide monitoring data to different requestors (e.g. NGOs, general public, etc.), at different level of data aggregation though. Furthermore, the largest majority of the MS indicated their willingness to share national raw, disaggregated data with other competent authorities in all other MS, provided that all MS will share their own data. All MS agreed that whenever EFSA stakeholders will request information/disclosure concerning their national results, they would like to be informed.

The NG recognised the need to have in place a common policy on data protection/disclosure and agreed on the EFSA draft policy; however, some national experts considered that this policy and the levels of aggregation cannot be formally agreed by the NG and should be further discussed and voted at the SCoFCAH (pesticide residue section) and - possibly - also in other sections of the SCoFCAH that deal with all food domains covered by the draft EFSA policy (e.g. zoonoses. contaminants, etc.). Finally, in order to ease their work, EFSA and MS expressed their wish to see reported also in the EU legislation a reference to the common policy that will be adopted at the SCoFCAH.

5.2 Pesticide reporting names for data publication.

EFSA proposed that in the future EU Annual Reports on Pesticide Residues and in the DWH web-reports the names of the pesticides should be shortened in order to increase the outputs readability. To this extent the NG discussed the criteria needed to be followed to shorten the name of the legal residue definitions made up of more than one component.
All MS agreed on the use of the term ‘sum’ to be included after each pesticide name that follows a complex residue definition; in case two parent compounds are included in the same legal residue definition or in case the residue definition is made up of more than one compounds (i.e. parent compound and its metabolites and/or breakdown products) only the authorized compound or the parent compound will be used in the report name, respectively.

5.3 2012 pesticide monitoring data collection: schedule and EFSA documents/tools available.

EFSA informed that all but one supporting tools for the reporting of the results of the 2012 pesticide control activities have been made available to all experts involved in the pesticide data reporting. The 2012 MRL compilation will be made available shortly. EFSA anticipated that the new data collection is expected to open at the beginning of May 2013. The meeting participants were recalled that the legal deadline for submitting the 2012 national results is 31st of August 2013.

EFSA clarified that the newly allocated PARAM codes of the SSD data model have been created using the suffix ‘PAR’ instead of ‘PPP’. It is clarified that all the PARAM codes for the new substances added in the SSD, independently of the nature, will end with a “PAR”. Both new and old PARAM codes, which end with the suffix “PAR” or “PPP” can be selected for the pesticide data reporting, as long as they concern substances considered as pesticides.

5.4 2010 EU Report on Pesticide Residues: SCoFCAH feedback and media coverage.

EFSA shortly informed that – compared to the previous publications - the publication of the 2010 Annual Report on Pesticide Residues has been followed and covered by a larger number of media. EFSA thanked all experts for all the work done, which allowed the preparation of the EU Report.

5.5 2011 EU Report on Pesticide Residues: proposals for the revised content of the EU Reports.

5.5.1 The COM welcomed the recently published EFSA 2010 Monitoring Report which is a very useful source of information. However, the COM stressed that there is too much delay in the publication of the report as the data are needed much more timely for policy making. Furthermore, COM asks MS to submit their data to EFSA within the legal deadline.

5.5.2 In order to be more useful for policy making, the results of findings in Third countries should be made available to COM prior to publication. For reasons of transparency and in order to justify of the risk-based FVO inspections, more details on the control results should be given in the published report.

5.5.3 COM suggested considering the possibility to carry out the dietary exposure and dietary risk assessment only once every three years instead of each year since the EU-coordinated monitoring exercise is a 3-year rolling programme. EFSA supposed that they are legally obliged to do the exposure assessment each year. Furthermore, EFSA considered that this approach would not be appropriate for the acute risk assessment. EFSA questioned whether the overview on compliance with MRLs should then also be provided only once every three years. COM stated that this overview is needed annually. A MS supported the idea of 3-yearly reporting but pointed out that in that case also the monitoring exercise should be planned for 3 years instead of yearly. COM confirmed that this would be the case and that this issue should be further discussed.

5.5.4 COM highlighted that the current wording used throughout the report "samples exceeding the MRL" or "samples above MRL" has created some
confusion. Such wording may suggest that these samples are non-compliant with the legal limits, which may not be the case when the analytical measurement uncertainty is taken into account. COM considered that in the Annual Report EFSA did not make clear enough that only the numerical values of the measured pesticide residues were taken into account, without considering the analytical measurement uncertainty. COM proposed a different wording. The EURL SRM considered that mentioning numerical exceeding of the MRL is acceptable, but this can make things seem worse than they are to the general public.

5.5.5 Some MS recommended to the COM the inclusion of the PARAM pesticide codes of the SSD in the SANCO EU MRL database; this would ease the practical work of all the 27 MS (plus Norway and Iceland) downloading the content of the SANCO database and the data conversion into XML.

5.6 2014 EU Monitoring Regulation.

COM informed that the 2013 pesticide control Regulation (EU) No 788/2012 will be used (without major changes) for the preparation of the 2014 control Regulation. In September 2014, a COM Working Group will meet to discuss the changes to be brought to the future control EU Regulations. One MS proposed to drop the sampling and analysis of wheat flour due to the few positive findings in this processed commodity.

5.7 SSD revision: Results of MS consultation on the draft EFSA guidance document, MS comments discussion and SSD2 implementation schedule.

EFSA gave a first presentation on the EFSA project concerning the revision of Standard Sample Description (SSD1) data model (i.e. the development of the SSD version 2) aimed to e.g. the enhancement the SSD terminology catalogues and to the extension of the data collection to include additional data collection domains (e.g. zoonoses, food additives, etc.).

A second presentation was given by EFSA on behalf of the two national experts of the EFSA Working Group on SSD Extension (WG-SSD2), which could not attend the meeting. After the two presentations the meeting discussed the technical aspects linked to the potential SSD2 implementation at national level for the future reporting of the pesticide monitoring data to EFSA.

The EFSA WG on the SSD extension recommended switching to the SSD2 by 2018 in order to reduce the costs of supporting two different reporting systems. In the pesticide area this implies that the SSD1 should be fully implemented in the national data capture systems by the end of 2016 in order for the laboratories to record the 2017 pesticide control results, which will need to be reported to EFSA in 2018. In general, the meeting participants expressed a favourable opinion with regard to the implementation of the SSD2, but they also expressed their concerns with regard to the implementation of the new food classification which will be part of the SSD2 (i.e. the FoodEx2) and which will replace the current food catalogue “Matrix” and – at the same time - other two SSD1 catalogues (i.e. the catalogues “prodTreat” and “prodMethod”). The MS representatives indicated that the SSD2 implementation at national level should start only when a stable version of the FoodEx2 is made available by EFSA. Therefore, EFSA has been recommended to test the FoodEx2 for the recoding/reporting of the pesticide monitoring results. EFSA will explore the possibilities to provide financial and technical support to the MS for the testing of the SSD2 in the pesticide area. Finally, EFSA informed the meeting that the outcome of this discussion will be forwarded to the EFSA WG-SSD2 for further consideration and for the elaboration of testing plans for the national implementation of the SSD2 in the pesticide residue area.
5.8 Baby food compliance with MRLs: MS/COM interpretation of the legal provisions.

In order to decide how to perform data analysis and what baby food results can be presented in the next Annual Reports on Pesticide Residues, EFSA explained the need to have a clear understanding how the MS perform baby food analysis, check the samples compliance against the MRLs and report the control results to EFSA. The NG recognised that there is not a common approach adopted in the MS to verify the baby food sample compliance against the baby food MRLs. The list of pesticides analysed in baby food samples varies among the MS; in particular, not all MS analyse for the list of pesticides included in the EU control Regulation, which falls under EU Regulation (EC) No 396/2005, so it is understood that the number of baby food samples to be sampled according to the EU control Regulation should not be mentioned in Annex II of this Regulation. The NG acknowledged that the national competent authorities and/or laboratories sometimes lack of clarity on whether the baby food samples should or should not be reconstituted before checking their compliance against the legal limits. The NG also took note that some laboratories experience difficulties in reaching low LOQs (lower than the default limit of 0.01 mg/kg), and when minimum LOQs are achieved, this is only achieved for some pesticides. Despite the analytical difficulties, it was noted that all MS test baby food samples. Finally, COM informed that the above topics related to baby food are risk management issues that would need to be discussed in the appropriate forum with Member States experts, i.e. in the SCoFCAH.

5.9 Cumulative Risk Assessment (CRA): methodology for monitoring risk assessment, EFSA recommendations and EFSA new Working Group on CRA.

MS were informed that for the time being no EFSA Working Group will be established to deal with the CRA methodology because the COM is in the process to create a new one in which EFSA may be represented.

5.10 Screening methods

So far, only one MS is currently reporting to EFSA the results of the pesticide control activities, which are generated by using screening analytical methods (only the “negative results”). EFSA recalled the need to have these results clearly flagged in the SSD in case these would need to be treated differently as results generated by means of other analytical methods. All MS were in favour to report the screening method results in the future (if those will be produced), as long as the screening methods will follow the validation procedures described in the concerned SANCO document. The revised SANCO document, which will set more stringent requirements on the screening method validation, will be presented and adopted at the next EURL workshop (Almeria, October 2013). A proposal on how the screening methods results will be reported to EFSA in line with the SSD data model will be elaborated and discussed in the next Networking Group meeting.

6. Any Other Business

6.1 Centralised support to meeting organisation.

At the beginning of the meeting EFSA gave a presentation on the new procedures concerning the practicalities for the experts attending the meeting of the NG on Pesticide Monitoring (e.g. invitation letter, shuttle booking, pre-paid tickets, etc.).

6.2 DDAC/BAC data collection.

A MS asked to clarify if the results of the ad-hoc data collection on DDAC and BACs, which have been already transmitted to EFSA in early 2013, should be reported also
to the COM. The COM confirmed that a second transmission with the same data to the COM is not necessary.

6.3 MRL for methomyl/watermelon combination
A MS raised the issue concerning this pesticide/matrix combination. According to an EFSA reasoned opinion an MRL of 0.02 mg/kg was proposed, whereas in the COM database a legal limit equal to 0.1 mg/kg is reported. The COM informed that will come back to the MS with clarification on this.

7. Next meeting
16 – 17 October 2013 in Parma.