EVIDENCE MANAGEMENT UNIT

Network on Chemical Monitoring Data Collection Minutes of the 3rd meeting

Tele-conference, 11-12 November 2020

(Agreed on 30 November 2020)

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1. Welcome and apologies for absence

The Chair welcomed the participants to the 3rd meeting on the network on chemical monitoring data collection.

1. Adoption of agenda

The agenda was adopted with the following change: inclusion of a presentation on Hydroxymethylfurfural (HMF) occurrence data.

2. Minutes

The minutes were agreed by written procedure on 30 November 2020 and published on the EFSA website 2 December 2020.

3. Topics for discussion

3.1 Review of the 2020 Chemical Monitoring Data Collection

EFSA presented an overview of the 2020 Chemical Monitoring data collection and the survey results. Overall, significant numbers of records and samples were transmitted for all data domains in 2020, coming from 34 countries and 15 private entities (for contaminants and food additives). Survey results showed a high degree of satisfaction with the different aspects of the data collection process, but also highlighted three main issues for attention: timely availability of materials (guidance, business rules (BRs), catalogues, tools), Data Collection Framework (DCF) performance, and usability of Microstrategy reports and dashboards. Measures to improve these points were discussed in this and other related presentations throughout the meeting.

Some network members acknowledged the general well-functioning of the data collection, considering the amount and complexity of the data involved. The organisation of network meetings at an earlier date with respect to the next data collection (in November) was also well received as a means of identifying issues and finding solutions at an earlier stage, thereby facilitating the data collection process.

3.2 Lessons learned from reporting pesticide residues data

An overview of the lessons learned from reporting pesticide residues was shared with the network, and changes for the next data collection presented:

i) timeliness of the ChemMon documents publication will be improved for 2021 with an earlier consultation process, and the usability of Teams for collaboration will be enhanced with new access rights for data providers (DPs) and data validators (DVs);

ii) coding of EUCP commodities using FoodEx2 will be facilitated by sharing an Excel file with all codes to be used in the next 3-year cycle (sampling years 2020-2022), after clarifications and feedback are collected from the Network;

iii) an update of the content of the pesticide *paramCode* hierarchies (pestParam hierarchy) is currently ongoing with the participation of National Reference Laboratories and Member States (MSs);

iv) feedback from reporting countries on the legal limits database will be requested once the database is updated;

v) a new Business Rule will be implemented for 2022 (warning in 2021) in order to enforce the correct reporting of expression of result type (*exprResType*) and percentage of fat (*exprResPerc.fatPerc*) for data on meat, milk and eggs;

vi) Feedback was requested in becoming mandatory *resValUncert* in 2022 data collection.

During the discussion, a general need for clarification and revision of sampling strategy codes and definitions was stressed by reporting countries and EFSA staff. Current definitions come from an early-2000s EuroStat document and revisions might be needed to make them fit-for-purpose for new data collections and to avoid divergent interpretations. EFSA will revisit and collect feedback on this matter and clarify its interpretation of the different codes.

EFSA also clarified that the Excel file mapping EUCP commodities to FoodEx2 codes has already been presented at the Monitoring Working Group meeting on 9 October and is currently open to feedback from network members via Teams until 30 November. The final file will be published before the opening of the 2021 data collection, and samples coded with those FoodEx2 terms in the corresponding year, will be automatically flagged as EUCP.

3.3 Lessons learned from reporting VMPR data

Perspectives on the main lessons learned from reporting VMPR data were shared with the network, and refer to:

i) sampling year - only samples taken in the corresponding reference year are considered for the final annual report (e.g. *sampYear*=2019 for the 2020 data collection);

ii) group A/B substances - feedback was asked on potential discrepancies found between EFSA's (VMPR analysis hierarchy of PARAM catalogue) and national or EC classifications;

iii) paramType - proper use of *paramType* codes was challenging, and of high relevance since records flagged as P002A are not included the annual report;

iv) Microstrategy - work towards easier filtering and quicker validation will be done, with the possible inclusion of unique identifiers (*sampId*, *datasetId*), product and substance groups in tables of the national reports and validation dashboards.

Several network members emphasised the difficulty of coding the parameter type and expressed their disagreement with the exclusion of large numbers of records coded with *paramType* P002A that could not be corrected on time. EFSA acknowledged these difficulties, thanking data providers for their hard work to overcome them, and advised that clarifications on this matter is to be provided under item 4.8.

Portugal sought clarity regarding the timelines to be applied to chemical contaminants that fall under the scope of Directive 96/23 for VMPR. EFSA recommended to identify such compounds (and similarly, pesticides that fall under the VMPR scope) early in the data collection process in order to include them in the VMPR annual report. Issues with the reporting tools were also highlighted by Portugal, and EFSA answered that this would be covered in a later presentation. Norway suggested utilising newer legislation to clarify the classification of VMPR substances into groups A and B; EFSA's hierarchies will be updated accordingly.

3.4 Lessons learned from reporting chemical contaminants data: proposal on reporting expression of result

The issue concerning how the result is expressed (*exprResType*) when reporting contaminants in feed was outlined, which can hamper the work of exposure assessors. EFSA proposed that for future data collections if the analytical result in feed is expressed on whole weight (B001A), then reporting the fields of expression of result (*exprResType*) and percentage of moisture (*exprResPerc.moistPerc*) should be mandatory. If it is expressed in 88% dry matter (B004A) instead, then the field of expression of result (*exprResType*) should be left empty.

Denmark proposed not to leave the field of *exprResType* empty and thus always report a value for it, since such values exist in the catalogues. EFSA answered that

it will take this suggestion into consideration and review the proposal in order to implement the best possible solution.

(NOTE: after the meeting this issue was re discussed and agreed that a value for *exprResType* should always be reported and, in case the result is expressed on whole weight basis, it would be highly recommended to provide the moisture percentage, if known, but not mandatory).

A further presentation focused on the miscoding of Hydroxymethylfurfural (HMF) data transmitted to EFSA over the sampling period 2002-2019. During a recent analysis of data, EFSA identified that 61% of the HMF analytical results transmitted to EFSA were misclassified and the data refers to "TEQ dioxins and dioxin-like PCBs UB", as subsequently confirmed by the organisations who provided data. No evidence has been found that the parameter corresponding to HMF has changed in the past, and the source of the miscoding is unknown. Recodification of the analytical results affected is ongoing and EFSA also took the opportunity to remind the network to always use the latest versions of catalogues and tools, which are downloadable from Zenodo[1], the EFSA Catalogue Browser[2], and the DCF web application[3].

3.5 Lessons learned from reporting food additives data: sharing monitoring data on food additives with EFSA

An assessment of the additive occurrence data reported to EFSA in 2020 was shared with the participants together with a proposal on extending the existing EFSA agreement on data sharing with WHO for use in JEFCA risk assessments to include food additives as the scope of the current agreement relates to contaminant data only. Since over half of MSs did not send additive occurrence data, EFSA asked MSs whether they collect monitoring data on food additives and, if they do, to which organisation or institution they send them (e.g. the EC). In a written comment Luxembourg in reporting data to EFSA under the scope of Regulation (EC) 1333/2008 on food additives and Regulation (EC) 1334/2008 on food flavourings due to a lack of specific *paramCodes* in the catalogue PARAM. Following up on this point EFSA advises that data on authorised food additives is collected in the scope of Regulation (EC) 1333/2008 and to support the re-evaluation of food additives in accordance with Regulation EU 257/2010. If any codes for food additives are missing from the EFSA catalogues the network should inform EFSA to allow for their inclusion.

EFSA also pointed out that the extension of the data sharing agreement with WHO would be in alignment with the publication of data from scientific opinions established by the technical report for data collections as well as with EFSA's general approach towards open data under the new transparency regulation. Further discussion on the points raised can be provided in Teams.

3.6 Chemical monitoring validation dashboards and national reports: review and suggestions for consolidation

In response to input from the network in relation to the Microstrategy reports (dashboards and national reports), EFSA presented some further guidance on how

[1] https://zenodo.org/record/3243215#.X75vF81KgdX
[2] https://github.com/openefsa/catalogue-browser/wiki
[3] https://dcf.efsa.europa.eu/dcf-war/dc

to utilise the reports and a proposal to collaboratively work with the network on improvements.

EFSA proposed to organise a specific workshop in early December 2020 in order to discuss the implementation of improvements in validation dashboards and national reports. An Excel file will be circulated via Teams for expressions of interest to participate in this activity.

3.7 Chemical Monitoring Reporting Guidance: proposals for updates

The 2021 guidance document has been reviewed internally by EFSA staff, and the main areas for revision were shared with the participants. Clarifications and updates on how records are assigned to the different domains based on legal reference *progLegalRef* and substance *paramCode* were provided. Other major updates concern *paramType* and *exprResType*, and details are provided in subsequent agenda items. The draft version of the guidance was shared in Teams on 6 November 2020 and input from network members was requested with a deadline of 4 December 2020**.** The publication of the final version is planned for the end of January 2021.

3.8 4.8 ParamType/'Sum' handler: new approach

EFSA presented a proposal for the automatic assignment of the data element ***paramType***. A document detailing the proposal is being finalised and will be shared with the network with a deadline for commenting of **4 December 2020.** Data providers received positively the new approach to assign *paramType*, since it simplifies reporting.

France raised concerns about the recommendation of having to report the summed residue definition in cases where all individual components are below the LOQ (and in lower bound case). EFSA explained that when having quantifiable results, the requirement is to report the full residue definition and the quantifiable result, although reporting the individual components is always recommended since it is useful for risk assessment. However, EFSA also acknowledged that in the case of negative results, calculating the sum can be more complex and proposed to exchange specific examples.

Some data providers asked for clarifications on the obligation of reporting summed LOQ, given that all results (metabolites, congeners, etc) are already being reported. EFSA explained that in contaminants reporting individual LOQ of the component would be enough and reporting the sum is only a plus that can be used to evaluate compliancy with maximum levels (MLs), if they exist. For the particular case of dioxins and PCBs, EFSA clarified that if these are reported under the remit of VMPR, then summed LOQ is required, but this might change in the future if these substances are no longer part of VMPR.

Denmark expressed confusion about EFSA's actual meaning of "legal residue definition", especially regarding illegal substances in VMPR or contaminants having ML values. They expressed their view that SSD2 should be used solely for the purpose of reporting analytical results, not mixing them with legal references. They proposed going back to the old definitions that only used *paramType* 1, 2, 3 and 4, thus only referring to the number of standards used, which would be harmonised across all domains. EFSA will take these points into consideration.

Italy asked whether *paramType* P003A is usable for pesticides, and EFSA explained that P003A corresponds to residue definitions not legally defined and

therefore is not recommended for the pesticide's domain. In relation to this, Cyprus proposed the use of *paramType* P003A for combinations of breakdown products and metabolites not included in full residue definitions but detected in the analysis. EFSA said that these should be reported as P002A since they are components and will be automatically differentiated from P002A components that are part of the full residue definition based on a specific file containing a classification of components into families.

Both Italy and Sweden asked for clarifications on the summing of LOQ values (*resInfo.notSummed*=Y) and its corresponding business rule for *paramType* P004A and P005A. EFSA explained that MRLs apply to full residue definitions and not components, and therefore are based on summed LOQs. If a country does not provide an LOQ for a P004A or P005A definition, setting *resInfo.notSummed*=Y means that EFSA will calculate it based on the sum of the LOQ values of its corresponding P002A components, provided there is at least one. EFSA also clarified that this procedure is already agreed and established for pesticides and does not plan further changes, but it could possibly be generalised to the other domains and remove the requirement of reporting *paramType*.

Italy also asked whether the *paramType* to be used for the sum of the 4 Aflatoxins (AFB1, AFB2, AFG1, AFG2) should be P005A since maximum limits are defined, and if the LOQ for the sum is calculated as the sum of the LOQs of the single aflatoxins. EFSA clarified that the LOQ of the sum of the 4 Aflatoxins can be calculated summing the single LOQs and that the P005A could be used.

EFSA stressed the need for feedback via Teams on the above-mentioned document in order to clarify and sort all these questions.

3.9 Param components list for 'Sum' handler

Supplementing the proposal for the *paramType* sum handler, some examples of how the assignment of *paramType* could work with different residues and substances were presented.

Ireland asked about the treatment of possible (rare) cases where a metabolite can be part of different residue definitions, and how to identify to which of them it belongs. EFSA agreed to collaborate in Teams and with NRLs and EURLs to come up with concrete examples for this ambiguity.

3.10 Proposals for Business Rule updates

EFSA outlined the proposed updates to DCF validation rules for the next reporting cycle. Overall, there will be minimal changes except some amendments and a few new proposals including the need to align the legal reference with the substance to ensure that records are assigned to a specific domain. EFSA explained that these proposals are already in the draft guidance and open for comments. New business rules can also be proposed.

3.11 Legal Limits Database: domains covered, update and publication

EFSA provided an overview of what was accomplished regarding the development and implementation of the legal limits database (LLDB) and the next steps in its development. The LLDB Web Reporting tool was also presented and some practical examples were shown. Denmark congratulated EFSA for developing this tool and asked for an agreement on using the exact same element names as in SSD2 e.g. *paramCode* instead of param. EFSA will take this request into consideration but

advised that some other elements are not used in SSD2. As a basic principle, it was agreed that when a field in the LLDB corresponds exactly with a field in SSD2, the same name should be used. In reply to France's question if the database is available, EFSA clarified that it has been shared within all the network.

3.12 Items suggested by network

EFSA provided an overview of the Recommendations of the Advisory Forum Task Force on Data Collection and Data Modelling 2018-2020 and sought input from the network on possible collaboration opportunities in partnership with MSs (Member States) which EFSA could be in a position to fund and which would advance these strategic recommendations.

EFSA stressed its willingness to move towards a more ecosystem approach with MSs, where EFSA facilitates projects and advances to improve the overall EU food safety system architecture and that MSs are the key actors in the ecosystem. In this regard, EFSA asked MSs to come forward with cross-country project ideas that EFSA could fund, where a MS could lead instead of EFSA. EFSA emphasised this unique opportunity, given the extra funding available from the new Transparency Regulation that could be reinvested in MSs.

Jean Cedric Reninger (France) presented the alignment of ANSES' data strategy and AF TF report recommendations, discussed collaboration options to reach these recommendations (Focal Points, TEAMS) and presented a *R-shiny* tool used to monitor data quality. To EFSA's question on the possibility of making the shiny tool available, France explained that the tool is not based on SSD2 and therefore cannot be used by others as it is. However, they could offer support with the development of a similar concept for wider adoption. They also clarified that the tool is still in the test phase and the number of data domains covered are increasing, currently including VMPR, pesticides, contaminants and some microbiology data. Ireland asked how the tool works for laboratories. France explained that laboratories just need to send the data to the food ministry and then the tool uses all data directly from the ministry's database, with no further action from the laboratories. Ireland considered the possibility of using a similar approach for their national data on a monthly basis.

David Foster (Sweden) gave a short presentation on the need for automation and turning "from files into code". He proposed making business rules, catalogues or the legal limits database into code or APIs (Application Programming Interfaces) that can be accessed by national IT systems. Several MSs appreciated this idea. France acknowledged the need for automation of data processing instead of manually transforming data and put as an example the FoodEx2 SCA (Smart Coding App) recently developed by EFSA that uses text mining to select FoodEx2 codes. He proposed as a future improvement to allow coding in batches, instead of on an individual basis.

While agreeing with these ideas, EFSA reminded participants of the unevenness among MSs resources and IT infrastructures for data management, and proposed MSs with more experience and resources to share experiences with the rest. The availability of funding could be an opportunity for MSs to implement modern distributed data architecture processes to enable interoperability and shared technology.

EFSA asked participants to think about what they, another MS or EFSA could do in order to improve the experience of transmitting data to EFSA, and what benefits they would hope to receive as a result of participating in such an ecosystem.

12 November 2020

4. Welcome and apologies for absence

The Chair welcomed the participants to the second day of the meeting.

5. Topics for discussion

5.1 Round table: Regulation (EU) 625/2017 on Official Controls: update on the status of delegated and implementing acts.

The general aim of this section was to i) discuss the new regulation and its impact on the different data domains, and ii) discuss the possible "anticipation" of the ChemMon data collection.

i) The impact of Regulation (EU) No 2017/625, which entered into force on 14 December 2019, was shared with presentations from the several units in DG SANTE.

Ivana Poustkova from E2 gave a presentation on the two new implementing acts (IA) on control plans of VMPR and contaminants in food that will be adopted following the repeal of Directive 96/23/EC. Among other effects, these IA will require VMPR data to be reported by 30 June each year and possibly also for contaminants (still to be discussed). This will require an earlier publication of EFSA's tools as well as the opening of the data collection. The presenter also indicated that in future the collection of contaminant data not related to official controls such as acrylamide, alternaria toxins and furan can be collected under the provision of an IA. Siret Surva from E4 introduced the implementing and delegated acts that reinstate the deleted articles 30 and 27(1) from Regulation (EC) No 396/2005 on pesticides residues under the new regulation framework.

Clarification was requested on the domain to use when reporting dual substance falling both in pesticides residues and VMPR domain. EFSA explained that dual substances currently are included in both domains and therefore counted in both pesticides and VMPR annual reports, but this issue will need to be further discussed with EC.

In an email receive on 13 November Ivana Poustkova (EC) clarified that: results on controls of substances gathered under Directive 96/23 plans should only be included in the VMPR annual report even if MRLs have also been set under Regulation 396/2005, results on controls of substances under Regulation 396 plans should only be included in the pesticides annual report, even if MRLs have also been set under Regulation 37/2010, and results on controls of dual-use substances that fall under programmes of 96/23 and 396/2005, and for which MRLs have been set under regulations 396/2005 and 37/2010, should be included in both VMPR and pesticides annual reports. The latter case also includes pesticides not authorised but misused as VMPR. For these dual substances, EFSA should state and explain in the pesticides and VMPR reports: their dual reporting as VMPR and pesticides residues, possible differences in sampling strategies (e.g.

random vs risk-targeted) and the MRL against which the assessment is performed: 37/2010 for VMPR, 396/2005 for pesticides and also for pesticides active substances misused as VMPR).

ii) Telmo Valinhas from SANTE F7 explained the main changes for multiannual control programmes (MANCPs) and MS annual reports arising from the new OC regulation. For MANCPs, these include an enlarged scope, the designation of a single body (for both MANCPs and annual reports), the availability of MANCPs to the public, and commission empowerments for specific additional contents. In the case of annual reports, changes include facilitating the collection and transmission of comparable data, a new deadline for submission on the 31 August every year, a standard model form and online electronic version (AROC), and commission empowerments for specific additional content. Guidance documents for the new standard model form for annual reports and for preparing MANCPs are in preparation and will be adopted in Q1 2021.

Through the Annual Report on Official Controls (AROC) SANTE and EFSA aim at avoiding MSs double reporting by providing a web service to SANTE to directly link the data sent to EFSA with AROC. However, both submissions (to EFSA and to SANTE) are set to the 31 August 2021. By anticipating the submission to EFSA to the 30 June, MS will avoid the double reporting. A first attempt will take place in 2021 for those countries who have an earlier submission.

EFSA opened the discussion on submitting all ChemMon data by the 30 June each year, with the aim of having time to clean, validate and accept data before the deadline for VMPR and pesticides annual reports (31 August).

Several MSs (Denmark, Luxemburg, Germany, Norway, Italy and Ireland) welcomed the proposal and committed to reporting data by the 30 June. Germany proposed a change to the regulations impacting contaminants and pesticides. Other MSs, (Cyprus, Greece, France, Belgium, Spain) expressed concerns about the anticipation of the deadline and found it particularly challenging for the year 2021 in view of COVID and current national analysis schedules, lack of IT infrastructure and planned upgrade plans, but would explore the possibility for 2022.

EFSA explained that if the proposed deadline is not met, MSs will have to transmit data to EFSA and to SANTE. Therefore, the proposed deadline aims to avoid this extra work on MSs. EFSA, nevertheless, acknowledges the challenge of this earlier deadline in view of the different infrastructures in different MSs and needs, but encouraged MSs to try to submit by 30 June to avoid double reporting.

Responding to questions from Denmark and Spain, EFSA clarified that the deadline of 30 June is only for transmission and not for validation. Validation will be during July and August and final acceptance to DWH by the end of August. This will also allow EFSA to anticipate the preparation of the Annual Reports and the new tools for the next data collection. Cyprus requested clear written procedures and guidelines on how to report pesticides data under the VMPR plan.

Belgium asked about the different level of detail regarding MANCP data reported to EFSA and data in the annual reports, especially compliances/non compliances. The EC clarified that data from EFSA is at an aggregated level on the number of official samples carried out in different food categories for different data domains (pesticides, VMPR, additives). Non compliances will have to be reported by MSs directly to EC, and they will not come from data reported to EFSA.

In reply to Luxembourg about the date of publication of tools and materials by EFSA given the new deadline, EFSA guaranteed that all materials will be provided well in advance.

Italy described the difficulty of using different food classifications for MANCP and FoodEx2 and asked EFSA and EC for a unique classification. EFSA replied that once the mandate is published, EFSA will explain how to translate FoodEx2 codes to categories in MANCP. EC explained that a consensus was reached in the past on the use of food categories from the additive's legislation for MANCP, but acknowledged the problems associated with this decision. Work is ongoing between EC and EFSA to generate a mapping of FoodEx2 codes to categories in Section 1 of the Annual Report (table 1.4) and should be finalised soon. The preliminary mapping has already been shared with some MSs and can be requested, but the final version will be made available by end of November.

5.2 2021 Harmonised Chemical Monitoring Data Collection

An overview of the process for the 2021 data collection was shared with the meeting. No major deviations from previous years are envisaged, but rather a consolidation of the collection process. In line with bringing forward the date of the network meeting, input from network members is required in order to make changes and publish materials in a timely manner, particularly for the update of the catalogues. EFSA will contact network members by email to capture any changes and set up access rights as Data Provider, Data Validator, Data Viewer and Reporting Officer. Two methods will be used for communication with EFSA and among DPs: Teams (as first option, in order to solve questions that might be common to others), and ServiceNow (for more specific and private cases). Reporting tools for manual data entry and conversion to XML will be kept to three: "super simplified" (controlled terminologies not integrated and manual creation of XML targeted to industry), Excel tool "Flat" (integration of controlled terminologies and automated conversion to XML) and the Excel tool "with methods" (an enhanced version of the flat tool for non-redundant entry of negative results),), all of them published in Zenodo. In general, EFSA plans to keep changes to the SSD2 data model to a minimum in order to allow a continued use of tools and systems by reporting organisations and recommended the use of KNIME for data preparation. The main deadlines for the data collection were also presented, and are summarised in the following table:

1 March	Test area available
15 April	Data Collection open
1 June	Support Validation available (national reports)
30 June	Recommended deadline for transmission (legal for VMPR)
Mid July	Confirmation report available
31 August	Transmission closed for Regulation 396/2005 and Directive 96/23
1 October	Data collection closed
November	Network meeting
January 2022	Consultation on annual report
March 2022	Annual report publication

Luxembourg and Greece proposed that data providers should be able to reject data in order to ease validations this year. EFSA will take this proposal into consideration.

In response to Belgium, EFSA clarified the use of the Excel tool "with methods" for the non-redundant insert of negative results. Regarding the reporting tools, Portugal communicated problems in using the 2019 version, and asked for the availability of tools used in previous years. EFSA offered to discuss this in a specific meeting and suggested again the use of KNIME.

Luxembourg expressed concerns about keeping the date of 15 April for opening the data transmission given the proposed deadline for transmission two months earlier (30 June). They requested having the Excel tools very early (i.e. February) in order to make sure that data is ready for transmission.

EFSA offered to organise a specific meeting with interested members (e.g. Portugal, Luxembourg, Belgium, Romania) in order to discuss the Excel tools and find the best solution for all MSs.

In reply to Denmark, EFSA clarified that the recommended deadline of 30 June is for data transmission and not for acceptance to DWH. The deadline for acceptance to the DWH is the end of August. . Regarding legal transmission deadlines for the different data domains, in 2021 VMPR will have a legal deadline of 30 June and pesticides keep their original legal deadline on 31 August. A legal deadline for contaminants will depend on the new legislation. Nevertheless, EFSA repeated the recommended to send and accept data earlier in order to avoid double reporting.

Germany asked to reach an agreement on fixing a legal deadline on 30 June for contaminants and pesticides, in line with the one already agreed for VMPR, which they would favour. EFSA explained that this is still only recommended and needs further discussion. Frans Verstraete (EC) clarified that the discussion about the transmission deadline on the 30 June for the implementing act refers to data transmission from 2023 onwards. The idea is to work so that this deadline is feasible for MSs in two-years' time.

5.3 New EFSA mandates

An introduction to the mandate on the re-evaluation of the risks to public health related to the presence of phthalates, structurally similar substances and replacement substances from food contact materials (FCMs) was presented to the participants.

In the field of chemical contaminants, new mandates have been received for which there are specific data needs. EFSA emphasised the deadlines for transmitting data with for the different mandates, as data submitted after the deadline will not be assessed by EFSA to include in the opinions.

EFSA asked the network if collecting data on substances in FCMs falls under the remit of their organisations or not. None of the network responded to this request.

5.4 Proactive publication of contaminants data on Zenodo

The current mechanism for publishing chemical contaminant data and a new proposal for the proactive publication on the Knowledge Junction platform (Zenodo) was shared with the network. Starting from 2019, monitoring data has been systematically published in Zenodo following the publication of annual summary reports and scientific opinions. However, since only a few opinions on

contaminants are adopted every year, the rate of publication of contaminant data has been slow. Such lack of public data availability was noted at EFSA's last Advisory Forum by Denmark. To overcome this limitation, EFSA now proposes to proactively publish data on contaminants in food and feed on an annual basis, after they have been accepted and validated in EFSA's scientific data warehouse. Feedback and consent from network members on this proposal was requested.

Denmark explained that they receive a lot of requests from the scientific community to access contaminant data, and therefore they favour making them open access. They also asked to include text and not only codes in the data published by EFSA in Zenodo, so that more general audiences could make use of them. EFSA clarified that data in Zenodo are not thought for generalists and that IPCHEM (Information Platform for Chemical Monitoring) should be used instead, since they have put a lot of effort into data visualisation. Nevertheless, EFSA will consider Denmark's proposal for future enhancements.

Ireland asked whether certain elements would be protected for publication, and EFSA clarified that this would be the case as is done for PAD requests. A general agreement on proactive publication of contaminant data would indeed avoid constant PAD requests.

Germany considered the systematic publication of contaminants data difficult if they have not been first published at national level. In line with this, several other MSs (among which Greece, Belgium, and The Netherlands) raised concerns on giving consent to such publication during the meeting and asked for a formal written request.

5.5 EFSA communication via the Network channels

The use of Teams for network collaboration and a proposal to allow data providers to access Teams was presented. The next steps outlined for improving the use of this tool are reducing the number of channels in each team, organising better tabs and Sharepoint information, empowering members and promoting continuous feedback among users. Regarding access, EFSA suggests opening Teams spaces to DPs and DVs, as well as to all actors involved in annual reports (for pesticides).

The proposal to allow DPs/DVs to access teams and channels was generally well received by the network. No objections were communicated. In reply to Norway, EFSA clarified that access would be granted mostly based on DCF and Microstrategy user lists, since these are regularly updated.

Several MSs (Iceland, France) shared their difficulties using Teams when having different accounts (e.g., the national organisation and EFSA's accounts) and asked for the possibility of using their professional (national organisation) account in EFSA's Teams. EFSA explained that Teams does not allow double authentication and therefore the problem might not be easy to solve. The user necessarily needs to log out and log in. Alternatively, the easiest workaround would consist of using the web version of Teams in incognito mode. EFSA will post specific information about this issue in Teams.

5.6 Data providers/validators/viewers nominations, roles and responsibilities at country/national/ organisation level

An overview of the status of different roles in the chemical monitoring data collection was presented together with some reflections on some work arounds that had to be implemented in 2020. The main roles for the data collection, which

are defined at the organisation level and are not mutually exclusive, consist of: Data Provider (DP), Data Viewer (DW) and Data Validator (DV). Network Members will receive an Excel workbook with current roles pre-filled for each organisation in order to update users' details and roles. Any further requests or updates should be communicated opening a ticket in ServiceNow.

In the second part of the presentation, a proposal for a new role 'Reporting Officer' (RO) was presented for network discussion and consideration. EFSA asked network participants to share their views on this proposal, and to indicate if they would require more than one RO per country (per domain, as back-up, etc) and if they see a need for contract laboratories to be able to accept data from organisations in different countries. France and Ireland considered it better to have two types of reporting officers: domain specific ROs, and a national RO for coordination across domains. EFSA considered this proposal acceptable. Ireland also asked whether the RO would be the only person capable of validating and accepting data. EFSA considers this the ideal situation in order to reduce complexity, but technically it would also be possible to split roles. EFSA proposed commenting on this topic via a document shared on Teams with a deadline of 30 November 2020. Next steps will be decided once feedback will have been collected.

5.7 Public Access to Documents

A presentation on Public Access to Documents (PAD) processing was shared with the network. Two main points presented were the 2017 agreement on accessibility of chemical occurrence data and its update in view of the newer SSD2 data model as well as Personal Data Protection regulations, and the application of the Aarhus Regulation (EC) 1637/2006 on the accessibility of environmental information to chemical occurrence data, and in particular to MOSH and MOAH data.

In the 2017 agreement six SSD1 data elements are always masked when publishing contaminants data, five of them due to commercial interests and one for personal data protection. Based on this agreement, these six fields have been mapped to SSD2 and will also be automatically protected when publishing data. New personal data protection frameworks at national and EU levels might also impose the protection of additional elements (e.g. *anMethRefCode* in addition to the already protected *labCode*). However, in cases were data relates to "emissions to the environment", the Aarhus Regulation supersedes commercial interest and fields cannot be masked for this reason. The case of MOSH/MOAH data was presented as an example whereby the above-mentioned five fields would be disclosed in application of the regulation. Feedback on these issues will be formally requested from network members after the meeting.

France pointed out that text fields related to the sampled matrix (*sampMa*t) would suffer from the same problems than those related to the analysed matrix (*anMat*), and asked whether this would affect publication in Zenodo. EFSA explained that the use of free text fields is discouraged and clarified that free text is never published in Zenodo.

6. Any Other Business

During this session several pending topics and clarifications of previous discussions were presented:

Reporting expression of result and percentage of moisture in feed: an amendment of the original proposal was made: The expression of result *(exprResType)* always needs to be provided, whereas the percentage of moisture (*expResPerc.moistPerc)* is highly recommended if the analytical result in feed is expressed in whole weight (B001A).This will be set up as a warning Business Rule in 2021 and become mandatory in 2022.

Ethylene oxide in sesame seeds: Norway asked for updates on the presence of high ethylene oxide levels in sesame seeds imported from India and requested a specific discussion via Teams in order to learn how other countries are dealing with this issue. EFSA summarised the main points released by the Crisis Team on the topic, which will be shared on Teams. No opinion is planned at present, but MSs will be informed if this changes.

Ireland commented on the lack of accredited laboratories for the methods of analysis of ethylene oxide. EFSA explained that this is a case where support from EURLs in developing relevant methods is required.

EFSA will open a Teams post to address this issue.

Required feedback: EFSA shared a calendar for feedback on the different topics covered during the network as follows

What	How	By When
Guidance Document including BRs	Comments in document (Teams)	4 December 2020
Param Type	Comments in document (Teams)	4 December 2020
Microstrategy enhancements	Nominations by 30 November (Teams)	20 December 2020
Roles and responsibilities	Comments in document (Teams)	30 November 2020
Catalogues	Provide input in excel file (Teams)	30 November 2020
Pesticides/EUCP commodities	Word documents with comments sent to Paula.Medina@efsa.europa.eu	30 November 2020

Reporting of *paramType*: EFSA clarified that the reporting of *paramType* will no longer be mandatory in 2021, except for exceptional cases highlighted in the *paramCode-paramType* association tables. The exceptional cases will be specified by EFSA.

Transmission deadlines: EFSA stressed the convenience of having harmonised data transmission deadlines for the whole chemical monitoring data collection. The deadline of 30 June is already set up for VMPR and has been proposed for contaminants, but it would also be very convenient if applied for pesticides. This would allow synchronising data processing and validation and facilitate the preparation of the Commission's annual report. Nonetheless, the 2021 legal deadline for pesticides residues will remain on the 31 August, and the proposed

harmonisation deadlines of 30 June would be for 2022. In line with this, if data is transmitted earlier in the following years, supporting materials will also be provided earlier.

Reporting tools: a future meeting on reporting tools with interested MSs will be organised by EFSA.

Permission for data rejection: the option for data providers to reject data will be implemented and EFSA will look at the technicalities.

Proactive publication of contaminant data: the original proposal was refined by EFSA. EFSA's proposes that contaminants data will be published on Zenodo in March of the following year, coinciding with the publication of VMPR and pesticides reports. This gives time to MSs to publish their national reports if needed. A written request will be shared by EFSA for MSs to accept this proactive publication of contaminant data. Consent will be assumed in case of no response.

Data collection roles and accesses: EFSA will contact network members to gather changes in data providers, viewers and validators, the new reporting officer role, and the names for extended access to Teams.

Collaboration activities: MSs were requested to provide ideas for collaboration projects in data collection activities that could be funded by EFSA focusing on implementing the recommendations of the Advisory Forum Task Force on data collection and modelling.

Definition of sampling strategy: Norway shared a proposal on the need for harmonisation of the definition of sampling strategies based on the current definitions established in European legislation (targeted vs suspected sampling). EFSA welcomed the suggestions and proposed to organise a separate meeting on the topic.

7. Date for next meeting, conclusions and closure of the meeting

The next Chemical Monitoring Network meeting will be organised in the month of November 2021 (tentative dates to be communicated by EFSA).