

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

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WORLD HEALTH
ORGANIZATION

Agenda Item 3

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Thirty-first Session

The Hague, The Netherlands, 12 - 17 April 1999

MATTERS REFERRED TO THE COMMITTEE

RESPONSES TO COMMENTS RECEIVED ON THE RECOMMENDED METHODS OF SAMPLING FOR THE DETERMINATION OF PESTICIDE RESIDUES FOR COMPLIANCE WITH MRLs

(Submitted by the United Kingdom)

The paragraph and Table numbers, below, refer to the revised CCPR recommendations, given in ALINORM 99/24.

COMMENTS FROM THE CCRVDF

1. **The sampling recommendations apply to pesticides used for plant protection but not to veterinary uses.** In principle this is correct but in practice the source of residues is likely to be unknown at sampling and likely to be impossible to determine from the analytical results.

COMMENTS FROM THE CCMAS

1. **CCPR sampling recommendations should not contradict the CCMAS guidelines on sampling.** The CCMAS guidelines do not appear to be finalised but the draft CCMAS guidelines were taken into account in preparation of the CCPR recommendations.
2. **Harmonization of terms to ISO 7002.** Agree, as far as practical.
3. **Table 2, clarify requirement for composite samples of plant products and single primary samples of meat and poultry products.** Agree.
4. **Table 2, deletion of sample numbers required for incidence <5%.** The numbers should not be deleted, because they indicate what would be required if it was considered essential to detect a low incidence of non-compliance.
5. **Paragraph 4.4, procedure for evaluation of results is too complex.** Only broad guidance is provided (i.e. nothing is prescriptive) and it will be difficult to simplify it further.

COMMENTS FROM ARGENTINA

1. **Annex 1, Definition of terms, should incorporate “representative sample”.** Agree.
2. **Sampling record.** Sampling records must accompany each laboratory samples. National legislation may require that the producer or owner of the lot is provided with a laboratory sample.
3. **Paragraph 4.1.** The proposed change in the Spanish wording appears acceptable. The clarification required for the origins of the additional analytical portions should be addressed. On the subject of

correction for recovery, no change should be introduced that is in conflict with the approach of the JMPR.

4. **Paragraph 4.4.** The data referred to in this paragraph may include uncertainty but no specific statistical tests for compliance or non-compliance are defined because CCPR delegations were unable to agree on them.

5. **Table 1 and Annex II,** the errors mentioned do not occur in the English version.

6. **Table 3, minimum size of laboratory sample of meat and poultry products.** The comment requires clarification.

COMMENTS FROM THE USA

1. **MRL should be defined.** Agree.

2. **Paragraphs 2.2, 2.3 and Table 2, “The MRL is intended to represent the average residue level in a lot....”.** The comment appears to confuse sampling of meat and poultry with that of other products and therefore it is difficult to respond.

3. **Samples required for the determination of residues of fat-soluble pesticides** should also be reconsidered in the light of recommendations made by the JECFA/JMPR harmonization meeting.

4. **Paragraph 3.4, fresh plant products are not to be cut or broken.** The comment confuses the preparation of the analytical sample (for which cutting is undesirable and may be unacceptable) and preparation of the analytical portion (for which cutting is likely to be essential).

5. **Paragraph 4.1, “...when a residue is found to exceed the MRL....”.** The comment confuses “analytical portions” with “samples”. Further samples are not to be taken, additional analytical portions are to be analysed.

6. **Paragraph 4.4, decision making should take into account the variation in results but no indication is given on how this is to be done.** Please refer to the comment made on the same point by Argentina.

7. **Table 1, Sampling suspect lots - degree of confidence required.** The recommendation for taking 6-30 samples derives from the previous recommendations and the CCPR should consider whether Table 1 should simply cross-refer to Table 2. The comment on sampling plant products, etc., does not acknowledge that primary samples are mixed to provide a composite for analysis.

8. **Table 2, Assumptions could be made regarding the residues distribution in lots of plant products.** Such assumptions are not possible.

9. **Table 2, Alter the title of the Table and introduce a procedure (e.g. ISO 2859-0) which enables a wider range of choices to be made.** The title should be amended. Rather than provide a complex procedure for the wider range of choices, the simple mathematical formula could be provided as a footnote to the Table.

10. **Examples should be provided for the novice user.** CCPR should consider this useful suggestion, perhaps adding an Annex 3.

COMMENTS FROM THE IDF

1. **Paragraphs 3.4 & 4.4.** The comment requires clarification.

2. **Paragraphs 3.5 and 3.6.** The point is accepted and the text should be amended to indicate that sample records may be completed and sent as hard copies or electronically and that sample labelling may be alphanumeric or bar codes and so on.

3. **Paragraph 3.7.** The last sentence of this paragraph doesn't really apply to dairy products. The inclusion of examples in a footnote should aid clarification (e.g. peach stones or animal bones).

4. Table 5, 2.1. The proposal for 0.2 kg or 0.2 l for processed milk products (as opposed to 0.5 kg or 0.5 l) is acceptable because these products tend to be reasonably homogeneous. For milk powders, the instructions should perhaps refer to aseptic sampling.

5. Table 5, 2.3 and 2.4. The sentence "Pats or rolls >250 g should be quartered and opposite quarters taken as units" should be deleted. This change will not alter the intention of the draft recommendations. The wording for cheeses >0.3 kg could be changed to "Whole unit(s) or unit(s) cut with a sampling device". The wording should remain unchanged for cheeses <0.3 kg but, for clarification, for ALL other Table 5 commodities the term "units" should be replaced by "unit(s)".

6. Table 2, note (d). Eggs and dairy products should be included in line 2 (as exclusions from the provisions of the Table), but the wording should not be as suggested by IDF, because this contradicts their requirement for taking single primary samples. Instead, it should read: "...a plant, egg or dairy product. Where composite samples are prepared, the statistical...."

7. Annex I, Definition of terms, Bulk sample. The suggested wording is tidier. The number of primary samples of dairy products can (and normally will) be one and therefore the primary and bulk sample will be the same thing, so nothing is changed in practice.

8. References. Agree.