

CODEX COMMITTEE ON PESTICIDE RESIDUES (CCPR53)

European Union Comments on

AGENDA ITEM 15

Discussion Paper on monitoring the purity and stability of certified reference material of multi-class pesticides during prolonged storage

(CX/PR 22/53/17)

European Union Competence
European Union Vote

The European Union (EU) would like to thank the Electronic Working Group (eWG) on the Guidelines for monitoring the Purity and Stability of Certified Reference Materials (CRMs) of pesticides chaired by India and co-chaired by Argentina and Iran for the preparation of the Discussion Paper with reference CX/PR 22/53/17.

I. GENERAL COMMENT

With reference to the considerations provided in Appendix I of Discussion Paper, the EU acknowledges the need and the purpose of the work on the Guidelines for monitoring the purity and stability of CRMs of pesticides beyond their expiry date, as a means to contribute to analytical cost reductions and to facilitate the work of analytical laboratories.

The EU welcomes and supports the development of this Discussion Paper and appreciates the opportunity to provide comments both on its Appendix I regarding the ‘Proposal for new work on the Guidelines for monitoring the Purity and Stability of CRMs of pesticides during prolonged storage’ and on its Appendix II containing information on the monitoring of the purity and stability of CRMs of pesticides during prolonged storage, as below:

II. DETAILED COMMENTS

1.1. Comment 1:

The title of the Discussion Paper CX/PR 22/53/17 coincides with the title of its Appendix II. They are both entitled “Discussion Paper on Monitoring the Purity and Stability of CRMs of pesticides during prolonged storage”. For reasons of clarity, the EU suggests changing the

title of Appendix II to “Technical Information on Monitoring the Purity and Stability of CRMs of pesticides during prolonged storage”.

1.2. Comment 2:

Appendix I, paragraph 2, sentence 1: the EU suggests modifying the sentence “The importing countries sometimes create non-tariff barriers by lowering maximum residue limits (MRLs) of a particular pesticide on a particular food commodity” as follows: “Differences in Maximum Residue Levels (MRLs) of a particular pesticide on a particular food commodity among countries around the world creates trade barriers”. Alternatively, the sentence can be deleted, as the lowering of the MRLs is not relevant with the scope of the document.

1.3. Comment 3:

Appendix I, paragraph 2, sentence 2: the EU suggests modifying the sentence “For generating true and authentic pesticide residue data, validated analytical protocols and CRMs are of the utmost importance for qualitative and quantitative determination of pesticide residues in foods” as follows: “Validated analytical protocols and CRMs are of the utmost importance for qualitative and quantitative determination of pesticide residues in foods”. It is not defined in the document what is “true and authentic” pesticide residue data.

1.4. Comment 4:

Appendix I, paragraph 2, sentence 1: Regarding the mentioning of “Recent studies”, the EU suggests that the authors include references to supporting literature.

1.5. Comment 5:

Appendix I, paragraph 3, sentence 1: The new work on the Guidelines do not and should not intend to “establish the purity and stability of CRMs” as this is verified by an accredited reference material supplier. Therefore, the EU suggests removing the word “establish” from this sentence.

1.6. Comment 6:

Appendix I, paragraph 4.2.1, sentence 2: The paragraph mentions the prioritisation of work between its various sections referring to Sections 1 and 2. However, those sections 1 and 2 are not found further in the document and, therefore, the EU suggests clarifying this point.

1.7. Comment 7:

Appendix II, paragraph 14, sentence 1: the EU suggests modifying the sentence “Commercial suppliers of pesticide standards sell CRM standards with limited expiry dates” as follows: “Commercial suppliers of pesticide standards sell some of their CRM standards with limited expiry dates”. The original sentence implies intent on the part of the companies and we believe it should not be in an official document. Furthermore, it is not accurate, as that is not the case of all CRM standards.

1.8. Comment 8:

Appendix II, paragraph 9, sentence 5: the EU proposes modifying the sentence as follows: “For expired CRMs, it is pre-requisite to verify the stability for subsequent use to ensure reliable analytical results”. For the subsequent use of expired CRMs it is not a pre-requisite to re-verify both their purity and stability as mentioned in the original sentence, but only their stability, because the purity is inherent in the stability.

1.9. Comment 9:

Appendix II, paragraph 12: the EU suggests deleting this paragraph. Verification of the purity of CRMs by participation in proficiency tests is not an appropriate approach. At most, questionable or unacceptable z-scores might indicate problems with the analytical standard solutions, but not necessarily related to the purity of the CRM. Furthermore, elements are not comparable to pesticides. The reference “Cunningham and Capar, 2014” is not in the list of references.

1.10. Comment 10:

Appendix II, paragraph 17: the EU suggests deleting this paragraph. The text is a summary of a scientific publication.

1.11. Comment 11:

Appendix II, paragraphs 19 and 20: the EU suggests deleting those paragraphs and including them as references a concluding paragraph, as the current text is a summary of different scientific works.

1.12. Comment 12:

Appendix II, paragraph 20: the EU suggests clarifying throughout the document that stock solutions prepared in the lab by solving CRMs cannot be considered CRMs if they are not prepared by an accredited reference material producer (ISO 17034).

1.13. Comment 13:

Appendix II, Reference 2: the EU suggests modifying the text to include the link to the document of the reference and not only to the National Measurement Institute. The link to the National Measurement Institute is not correct. However, even with the right one, it was not possible to find Reference 2: “Armishaw P (2016) Certified reference materials –A path to traceable chemical measurements. Department of Industry, Innovation and Science, National Measurement Institute, 5 May 2016, 1–26. <https://www.easurement.gov.au> [Accessed 24 Oct 2018]”.