Audit findings related to Sampling

AFI/EOCC/IFOAM residues workshop
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Who are we?

Directorate for Health and food audits and analysis within DG Health and Food Safety / European Commission

Grange, Ireland

180 professionals, including
- 90 auditors
- Veterinarians
- Agronomists
- Food scientists
- Other specialist qualifications

https://ec.europa.eu/food/audits_analysis_en
Background of organic audits by EC

- Court of Auditors – report
- Memorandum of Understanding between AGRI-SANTE 2011, renewed 2 times, current valid until end of 2019
- Start of audits by the end of 2011; first CB audits: 2013
- Audits selected by DG AGRI based on an annual risk assessment
Audits in Member States and in non-EU countries

By end of 2018 the total number of EC audits on organics were 63

- EU Member States: 28
- Non-EU countries: 10
- CBs in non-EU countries: 25

China (4), Turkey (2), Ukraine (3), Peru (3), Bolivia (2) other destinations (once)

**Plan for 2019:** 6 CB audits in non-EU countries, 3 EU MSs

**Reports:**
http://ec.europa.eu/food/audits-analysis/audit_reports/index.cfm
Lack of comprehensive sampling strategy→ inadequate timing and selection of the most risky operators or crops:

- Risk assessment not always fit for purpose of identifying the most risky operators

- Lack of accurate information: operators’ files often incomplete (in particular for new operators) and/or lack of proper verification of the information provided (e.g. type of crop and management of crops grown in the neighbouring plots);

- Samples not taken at the most suitable time to detect the use of unauthorised substances;

- Selection of operators/members of Producer Groups not always risk-based even if the information was available;
Lack of comprehensive sampling strategy→inadequate execution of the sample taking:

- At individual producers, most samples were taken only close to the borders of the plots, which limits the possibility to demonstrate the use of unauthorised substances by operators.

- Composite samples taken from several Producer Groups’ members or from several plots/sites at individual operators can have a dissuasive effect but:

1. Dilution factor not taken into account: samples composed of up to 14 individual samples;
2. In the case of a positive result, individual samples were not always analysed separately;
3. Heterogeneity of environmental conditions/circumstances of the individual members participating in the composite sample;
Lack of comprehensive sampling strategy—→incomplete scope of analysis and inadequate evaluation of the analytical results obtained:

- Some CBs operating in non-EU countries used laboratories with limited scope (e.g. multi-screening covered less than 200 pesticides);

- Some CBs did not request laboratories to test for pesticides that can only be detected by using single-residue methods (glyphosate, chloromequat, ...);

- Sampling sheets do not contain enough information on how sample was collected and about the environmental conditions/circumstances in which the sample was taken;
Lack of comprehensive sampling strategy → inadequate interpretation of laboratory results:

- Food-safety approach for the interpretation of analytical results (product-oriented instead of processed-oriented):
  
  1. Processing/dilution factors and uncertainty are taken into account to decide on presence/absence of substances close to quantification limit;

  2. Presence of unauthorised substances below 0.01 ppm not always followed-up, regardless of other sources of information available;

  3. Decisions taken without scientific basis (e.g. detection of phosphonic acid without detection of Fosetyl-Al is always considered as a false positive).
• Thank you!

• [Link](http://ec.europa.eu/food/food_veterinary_office/index_en.htm)