SARAF WEBINAR 20 December 2023
on Commission Implementing Regulation (EU) Regulation 2021/808
FAQ
Coordinated replies (3 EURLs, EC) to questions raised during the webinar

Q1	**808/2021/EC mentioned in detail about relative matrix effect which takes into account internal standard. If internal standard is not available in such case evaluating matrix effect would suffice the requirement of the regulation?**
A1	*In paragraph 2.10 chapter 2 of CIR 2021/808 Relative matrix effect is described. If no internal standard is available MF (Standard) needs to be calculated where the coefficient of variation of MF (Standard) shall not be greater than 20%.*
Q2	**Does one need to show repeatabiity and trueness (apparently recovery) meet acceptance criteria at ALL 3 concentrations? 0.1 x MRL can be problematic.**
A2	*Yes. At 0.1 MRL it should be as close to as reasonably possible.*
Q3	**Are the ISs defined for each family of antimicrobials or we can rely on literature?**
A3	*As it is also acknowledged for any classes of veterinary drugs, the IS is definitely not strictly defined for each family of antimicrobials. Both relevant scientific literature and EURL recommendation can be considered.*
Q4	**How could CCα be calculated with method 3 in qualitative confirmatory methods?**
A4	*As we consider qualitative confirmatory methods to be methods not fulfilling all criteria of quantitative confirmatory methods, confirmatory CCα can be calculated according to the methods given in paragraph 2.6 of CIR 2021/808.*
Q5	**How do you calculate the CCα in qualitative confirmatory methods without using calibration curve?**
A5	*Method 2 or method 3 from paragraph 2.6 can be used.*
Q6	**I agree with Piotr about the need to create a database on the stability of compounds!**
A6	*Stability data for VMPR including antimicrobial residues are pretty much scarce and disseminated in different documents, reports, articles, some of them posted on websites. In 2024 the 3 EURLs will start the discussion and a working group on the possibility to make a combined stability database available.*
Q7	**I thought that qualitative confirmatory methods are only allowed when validation criteria are not being fulfilled. At the beginning, all confirmatory methods have to be validated as qualitative methods. Am I right? I meant quantitative validation criteria have not been fulfilled (trueness and/or precision)**
A7	*Yes. See answer A4.*
Q8	**If I find a positive sample (>CCalpha) with a qualitative confirmatory method, is it necessary to confirm it with a confirmatory method?**
A8	*With a qualitative confirmatory method you can only identify substances according to criteria. If you need a quantification, either a full confirmatory method shall be used or if not then also MLSA can be used.*
Q9	**If the MRL of the substances in the group is not the same for all analytes, how to set the range of calibration curve if you need to validate all substances in the same time?**
A9	*Different calibration curves can be used, i.e. one different calibration for each substances of the group bearing the same MRL*
Q10	**If we use the QC data, is there any guideline published already on how to go through this procedure in practice?**
A10	*There is no guidance.*
Q11	**If we use the same technique but just change the model like from old one to the new one which is more sensitive, do we need to re-validate?**
A11	*See paragraph 4.4 in Guidance extension of methods v 2.0.*
Q12	**Is it possible, that the EU give a guidance to update the 657 validations to the 808 validation?**

SARAF WEBINAR 20 December 2023
on Commission Implementing Regulation (EU) Regulation 2021/808
FAQ
Coordinated replies (3 EURLs, EC) to questions raised during the webinar

A12	*The possibilities of an "upgrade" of previous method validations to 2021/808 were presented at several workshops. The EURLs take this question as suggestion to provide a kind of summary of approaches via the EURL website.*
Q13	**Is there any source (EU reference laboratories) for getting stability data for various antibiotic residues in standard and matrix?**
A13	*Stability data for VMPR including antimicrobial residues are pretty much scarce and disseminated in different documents, PT reports, scientific articles, some of them posted on websites. In 2024 the 3 EURLs will start the discussion and a working group on the possibility to make a combined stability database available.*
Q14	**Point 2.2.1.4 of 2021/808 states that a reproducibilty study requires three different blank materials - We believe this means you need just 3 diferent blank samples (e.g. different animals) to complete the reproducibilty study. Can you please comment?**
A14	*In Guidance for Extension of methods, 6 different batches are used (table 2).*
Q15	**Regarding the EURL Guidance. Is it mandatory or the labs can implement their validation directly the requirements stated in IR 2021/808? I am particularly interested in the number of samples from different origins that must be used.**
A15	*The guidance documents are not mandatory. They are there to guide the labs. You can use 2021/808 or any other guidelines which give the same certainty on the validation.*
Q16	**There seems to be some problem with the accreditation body in Spain as some auditors consider the Guidelines as mandatory. This issue should be clarified by EURLs to harmonise criteria. Thanks.**
A16	*The EURL Guidance Documents attached to CIR (EU) 2021/808 shall provide technical instructions for official control laboratories active in the field of veterinary drug residue analysis according to Regulation (EU) 2017/625. The documents' status will be that of associated documents to CIR (EU) 2021/808, representing the EURLs' interpretation of this document. Following the EURL Guidance Documents minutely will not be mandatory and different implementations are possible.*
Q17	**Was it not discussed in the last WG Residues to amend Reg 2021/808 with regard to the CV criterion of 20% to reflect the values listed in TAble 2 of the 1.2.2.2. Precison paragraph?**
A17	*Yes - this topic was raised in the WG and a revised wording was suggested - but it is not yet approved.*
Q18	**What if matrix effect is above 20 %.It is mandatory to calculate the matrix effect even if a lab is using internal standard and a matrix fortified calibration?**
A18	*If ME above +/- 20% is detected during analytical development, then a solution shall be found to reduce this ME. Several options : introducing relevant reliable IS, any other options, … or finally to redevelop the extraction-purification of the analytical method.*
Q19	**What is this reduced validation scheme? Is it defined in 808/2021/CIR?**
A19	*See Guidance document for extension of methods version 2/0.*
Q20	**When do you consider a one day revalidation?**
A20	*It depends - there are no rules for revalidation. It might be a good idea to repeat parts of the validation over a longer period of time (perhaps also together with routine samples) - so that you have after some time a complete revalidation.*
Q21	**Where can I download this guidance?**
A21	*https://eurl-residues.eu/* *You can download the latest version from the EURL portal. See link above*

SARAF WEBINAR 20 December 2023
on Commission Implementing Regulation (EU) Regulation 2021/808
FAQ
Coordinated replies (3 EURLs, EC) to questions raised during the webinar

Q22	**Where is available EURL published data for stability in matrix and standard data for CAP and Nitrofuran Metabolites?**
A22	*Stability data for VMPR including antimicrobial residues are pretty much scarce and disseminated in different documents, PT reports, scientific articles, some of them posted on websites. In 2024 the 3 EURLs will start the discussion and a working group on the possibility to make a combined stability database available.*
Q23	**Which ISTD used for doxycicline to do the matrix effect? if demeclociclyne is in the group of A3c by EFSA list?**
A23	Other tetracyclines could probably be replacing as ISTD. However, Demeclocycline can still be used for ISTD of docycycline even though the Demeclocycline is present in sub-group A3c. In fact, the ISTD should be absolutely needed for confirmatory purpose. But not necessary to be present for the screening step when detecting if Demeclocycline or Doxycycline or other tetracylines are present in the OC sample.
Q24	**Joachim, conventional validation scheme: 6 samples for ruggedness. What does this mean in practice?**
A24	An answer needs more space; it is planned to include a more detailed example in the EURL guide - then it might be clearer. A excel template for a robustness study is available at BVL (works with 24 samples).
Q25	**Are EU reference laboratories planning to organize webinar on the new EURL Guidance Document on Screening Method Validation? Version 1.1, 21 September 2023.**
A25	*Thank you for this suggestion we will discuss this with the EURLs in 2024.*
Q26	**Dear Frans, can it be expected in the (nearest) future that the residue monitoring legislation will be amended so that antimicrobials, especially those human-important, will be given special attention, in the AMR mitigation context? Are there any discussions on that point?**
A26	*There are for the time being no discussions ongoing to amend the residue monitoring legislaiton in that sense. However, within the current legal framework, guidance can be provided which substance/matrice combinations should deserve (more) attention in the residue control plans.*
Q27	**Does the regulation also apply to composite products from third countries?**
A27	*The import conditions provided for in Regulation (EU) 2022/2292 do also apply to composite products (Article 5 (1) (c)). Composite products must be produced from the primary products which are compliant with MRLs. The control plans on pharmacologically active substances and residues thereof do not require the inclusion of controls of composite products, insofar the primary products used for the production of composite products are sufficiently covered, but composite products can be included in the plan if needed.*
Q28	**Feed and animal drink water have to be in the scope of 808/2021 regulation?**
A28	The scope of Commission Implementing Regulation (EU) 2021/808 will be amended so that the scope covers only samples of food of animal origin or other samples taken in the frame of the control plans on pharmacologically active substances and residues thereof. Samples of feed and drinking water fall only within the scope of Implementing Regulation (EU) 2021/808 insofar the samples are taken as a follow-up investigation following non-compliance. Other samples of feed and drinking water will no longer fall within the scope of Commission Implementing Regulation (EU) 2021/808 and therefore the requirements of that Regulation are not applicable to the analysis of these samples of feed and drinking water.
Q29	**"in the COMMISSION REGULATION (EC) No 2073/2005 the item (24) say that: ""Test results are dependent on the analytical method used, and therefore a given reference method should be associated with each microbiological criterion. However, food business operators should have the possibility to use analytical methods other than the reference methods, in particular more rapid methods, as long as the use of these alternative methods provides equivalent results. Moreover, a sampling plan needs to be defined for each criterion in order to ensure harmonised implementation.**

SARAF WEBINAR 20 December 2023
on Commission Implementing Regulation (EU) Regulation 2021/808
FAQ
Coordinated replies (3 EURLs, EC) to questions raised during the webinar

	It is nevertheless necessary to allow the use of other sampling and testing schemes, including the use of alternative indicator organisms, on condition that these schemes provide equivalent guarantees of food safety. **There is mean: We can use another analytical methods diffrence the reference methods? ofcourse the analytical methods provides equivalent results.** **Example: the COMMISSION REGULATION (EU) 2019/229 (is amended COMMISSION REGULATION (EC) No 2073/2005) regulated that, the Histamine in fish and fishsery product mush be determinated by Analytical reference method (EN ISO 19343). but EN ISO 19343 (HPLC/DAD method) is the method with Hight-level histamine method.** **So can we use another analytical methods like HPLC/FLD method or UPLC/MS/MS methode to determinate histamine content? ofcourse, these alternative methods mush be provided equivalent results."**
A29	*Commission Regulation (EC) No 2073/2005 concerns microbiological criteria for foodstuffs, that means it is out of the scope of official controls on pharmacologically active substances. You can address your question at sante-consult-g5@ec.europa.eu.*
Q30	**That means the country that want to export to EU need to have 3 plans too, right?**
A30	*The third countries have to fulfil requirements laid down in Commission Delegated Regulation (EU) 2022/2292, that means they need to submit the control plan on pharmacologically active substances, contaminants and pesticide residues. Regarding the part on pharmacologically active substances, third countries need to submit the plan which is an equivalent of a national risk-based control plan for production in the Member States (Article 4 of Implementing Regulation (EU) 2022/1646). So, a third country that want to export to the EU needs only to have 1 plan equivalent to the national risk-based control plan from the Member States.*
Q31	**There is unfortunately a lack of harmonisation when it comes to checking accredition to ISO 17025 standard. In part this is due to issues with experience and expertise of the auditors.**
A31	*This is definitely the case - both at national and international level. As long as there is room for interpretation (which is inherent in the system), there will always be different opinions among experts (auditors).*
Q32	**Why is semi-quantitative method not an option for A substances?**
A32	*Semi-quantitative methods are defined for screening purposes only because they do not have to meet criteria for quantitative confirmatory methods. As A substances are prohibited or unauthorised substances, there is a need to have sensitive analytical method which fulfils all necessary performance criteria as laid down in Implementing Regulation (EU) 2021/808 and in the MMPR guidance document. This means for A substances it would be formally sufficient to prove just the presence of an analyte - then the sample is non-compliant. So in principle a semiquantitative method (i.e. a confirmatory method which does not fulfil the requirements of a quantitative method) could be used – and this method can be claimed "qualitative".*