SARAF WEBINAR 17 December 2025
on Commission Implementing Regulation (EU) Regulation 2021/808
FAQ
Coordinated replies (3 EURLs, EC) to questions raised during the webinar

Q1	**I have a question for Joachim: if I understood correctly, if a substance with MRL in 2010/37 for which there is recommendation to control that substance for illegal prescription, from now on we have to use the MRL value? I am referring to clenbuterol and some corticosteroids.**
A1	*No - the first approach should be to presume an illegal treatment. After the finding, it should be checked whether the origin of the residues was a legal treatment based on a very specific indication by a veterinarian or not.*
Q2	**I would like to have had more information about the percentage of methods or compounds already validated with Reg 2021/808 in each country.**
A2	*It should be possible to put the Dec 2024 inquiry in the EURLs website in restricted areas.*
Q3	**If Belac accreditation approach for validation of the method can be used from other laboratories or states it will be OK this for DG sante mission.**
A3	*It could be an idea to make an initiative at EA to develop a commonly used flexible technical guide (there are some in other areas) - The BELAC guideline could help - but it has to be checked to which extent it is in line with 2021/808*
Q4	**BELAC guideline prescribed somehow the way to perform the approach for qualitative confirmation, but can everyone apply that approach which determines the CCa according to method 2 (if I understood correctly their approach...).**
A4	*- The CCa-Method2 for prohibited substances with 20 representative blanks is no longer applicable as mentioned in 2021/808;* *- The CCa-Method2 for MRL substances is correct => MRL + k . (Combined)StdMU*
Q5	**A database with where to find analytical standards would be great.**
A5	*Suppliers lists are posted on the individual EURL websites - Also the database ALMANAC is already available and includes information on potential suppliers.*
Q6	**Selection of substances with regard to new substances that may appear in products as residues.**
A6	*EURLs are constantly monitoring new substances but no specific list has been delivered. This matter is constantly being discussed at the EURL/NRL workshops.*
Q7	**Do the NRLs in Belgium organize PTs themselves for OCLs or do they rely on the goodwill of the EURLs to include the OCLs?**
A7	*This is not foreseen on the VMPR side. Including larger numbers of EU-MS field labs in our EURL PT would require more money and thus an additional budget. Could be discussed on a case to case basis with the concerned NRLs.*
Q8	**Being so picky about stability data will not allow the use of already published data, as this data will not be complete. The same applies to PT data.**
A8	*Existing data is acceptable with flagging levels. A first draft of the guidance will be made available to NRLs for comments in the coming months. The database shall be at a correct level of reliablity of the stability data.*
Q9	**Given the inter-day variability in LC-MSMS conditions, is it still advisable to use it for stability checks of stock standard solutions?**
A9	*It is a compromise between efforts and output - but it is true: the present variabilities do not allow to make a very precise decision on the usability of a new stock solution*
Q10	**For cc alpha & cc beta calculation as per 808, are any templates available?**
A10	*Please contact EURLs for further possible sharing of templates.*
Q11	**Is there any database or calculator available to estimate cascading MRLs (Maximum Residue Limits)?**
A11	*There is no specific calculation. This issue is generally addressed at the EURL/NRL Workshops. Please contact EURLs for further possible sharing of information.*
Q12	**Please could we have more information about CCalpha and CCBeta?**

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A12	*Option 1 : please see the guidance documents on the EURL portal include link and if not sufficient Option2 : ask EURLs for support*
Q13	**For MRL substances, is there a limit on how much higher the CCalpha can be compared to the MRL? Specifically, what is the maximum percentage over the MRL that is still acceptable? 10%?**
A13	*CCalpha max calculation. If necessary see EURL for support.*
Q14	**2021/808 needs a revision to accommodate HRMS guidelines, am I not wrong?**
A14	*CIR 2021/808 already sufficiently addresses the concept. But technical details will be explained in the 2026 coming HRMS technical guidance to be relased on the EURL websites and cluster portal.*
Q15	**Is this HRMS guidance already available?? Please reply!**
A15	*CIR 2021/808 already sufficiently addresses the concept. But technical details will be explained in the 2026 coming HRMS technical guidance to be relased on the EURL websites and cluster portal.*
Q16	**Could you suggest a technique with 4 identification points?**
A16	*Please refer to Tables 3 and 4 of the Annex 1 of CIR 2021/808*
Q17	**Validation/revalidation of qualitative methods (microbiological screening method - 5-plate) at what level should substances be tested? Is CCbeta = STC at 0.5 MRL or higher acceptable, or should we test substances at 0.1 MRL, or does this apply to quantitative methods?**
A17	*Qualitative screening methods shall be validated against the 2021/808 according to the Technical Guidance for the Validation of screening methods. There is no need to further evaluate/validate the screening methods down to 0.1 MRL if they are used only for Plan 1 and Plan3 for regulatoy control at MRL levels.*
Q18	**Is the calculation of LOQ required or not? If required, is it above or below the cc alpha?**
A18	*LOQ is not required in VMPR legislation (but in pesticide legislation)*
Q19	**Validation should, of course, include all routinely tested matrices. In the case of kidneys, should we also distinguish (test) kidneys of different species when testing them?**
A19	*Yes, validation per matrix per species is needed.*
Q20	**Is there a minimum acceptable value/range for absolute recovery in veterinary drug residues in milk? Else even with 20% absolute recovery if recovery corrected (through internal standard or matrix fortified calibration) value falls between 80-120% will this be acceptable ?**
A20	*Using an internal standard or matrix fortified calibration, it is correct.*
Q21	**Are there any recommendations on which substances from the antibiotic groups should be tested and how many of these compounds should be included in the validation of screening methods?**
A21	*Lists of substances are discussed internally in the EURL/NRL workshops when setting up analytical methods.*
Q22	**How should commercially available screening tests for antibacterial residues be validated? How should the levels be selected in relation to the MRL and manufacturer-specified test sensitivity?**
A22	*Qualitative screening methods including commercially available screening tests for antibacterial residues shall be validated against the 2021/808 according to the Technical Guidance for the Validation of screening methods available in the EURL websites.*