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A4	*- The CCa-Method2 for prohibited substances with 20 representative blanks is no longer applicable as mentioned in 2021/808;* *- The CCa-Method2 for MRL substances is correct =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.*
Q23	**Will information about the extension of the deadline for compliance with the guidelines of Regulation 2021/808 be officially published in some document?**
A23	*There is a formal amendment to Regulation (EU) 2021/808 voted for the extension of the deadline on 13 February 2026. The Commission Implementing Regulation (EU) 2026/731 of 27 March 2026 amending Implementing Regulation (EU) 2021/808 as regards its transitional*

	provisions and certain provisions on sampling has been published on 30 March 2026 and can be downloaded from http://data.europa.eu/eli/reg_impl/2026/731/oj .
Q24	**What are the consequences if a CCbeta or CCalpha is not <MMPR? While MMPRs are "Guidance", these are being used for assessing NRCPs uploaded to EFSA for suitability of method performance in terms of CCa/CCb**
A24	*In case the CCbeta or CCalpha is not below the MMPR, the NRLs are requested to ensure that the necessary actions are taken to ensure compliance with that requirement in a reasonable time. For that, a concrete action plan needs to be submitted. For Member States, support from the EURL can be requested to achieve the objective. Third countries might request also assistance from the EURL but depending on the nature of the request (depending on the required resources for the assistance requested) , this might need first to be approved by the Commission services (in case it has an impact on the EURL budget).*