Proposed Regulatory Framework for Pesticide Residues in Food

Workshop on Pesticide Residue Testing

Analytical Performance Criteria Approach in Pesticide Residues Analysis





Trend of Method Development (1)

- Number of pesticides used is continuously increasing worldwide
- ❖ In order to fulfil the needs of speeding up analytical time and improving the quality, the direction of method development has also been changed :
 - Traditionally, international organizations and different national / regional institutions would publish standards or reference test methods for specific pesticides





Trend of Method Development (2)

- Regarding the test method recognition and quality control, the international trend has gradually changed:
- developing prescribed test methods
 - establishment of analytical performance criteria
- satisfactory comparability of results can be achieved by employing different analytical methods but with performance meeting the same requirements under internationally recognised protocols





Trend of Method Development (3)

- Different laboratories can use relevant criteria protocols or reference methods compiled by international or national organizations, or adopt appropriate test methods and fulfil the quality requirements being specified according to their:
 - > testing needs & intended purposes
 - facilities & resources



Key Elements on Method Performance

- Accuracy / Trueness
- **Precision**
- Specificity & selectivity
- Limit of Detection (LOD)
- Limit of Quantitation (LOQ)
 - Reporting limit



Current Status

Comprehensive international and national guidelines on the requirements of analytical methods and validation protocols:

- Codex
- EU
- OECD
- IUPAC
- HKAS (HKSAR, China)
- AQSIQ (P. R. China)
- etc.







Examples of General Guidelines

ORGANIZATION	DOCUMENT REFERENCE	TITLE
Codex	CAC/GL 40-1993, Rev. 2003, Amend. 2010.	Guidelines on Good Laboratory Practice in Pesticide Residue Analysis
		Codex Alimentarius Commission Procedural Manual, 19 th Edition
EU	SANCO/10684/2009	Method Validation and Quality Control Procedures for Pesticide Residues Analysis in Food and Feed
	Commission Decision 2002/657/EC, Annex	Performance Criteria, Other Requirements and Procedures for Analytical Methods
OECD	ENV/JM/MONO(2007)17	Guidance Document on Pesticide Residue Analytical Methods
IUPAC	Pure Appl. Chem., 2002 , 74(5), 835–855	Harmonized Guidelines for Single Laboratory Validation of method of analysis
HKAS (HKSAR, PRC)	HOKLAS Supplementary Criteria No. 37	"Food" Test Category - Chemical Testing
AQSIQ (PRC)	GB/T 27404-2008	Criterion on Quality Control of Laboratories – Chemical Testing of Food



Codex CAC/GL 40-1993 (Rev. 2003, Amend. 2010)

"Guidelines on Good Laboratory Practice in Pesticide Residue Analysis"

- Analyst
- Basic resources
- Analysis
 - Validation of methods
 - Performance verification
 - Confirmatory tests
 - Mass spectrometry
 - Lowest calibrated level (LCL)
 - Expression of results





Codex CAC/GL 40-1993 (Rev. 2003, Amend. 2010)

"Guidelines on Good Laboratory Practice in Pesticide Residue Analysis"

- Parameters to be addressed in
 - Method validation
 - Extension of validated method
 - Adaptation of validated method by another laboratory
 - Performance verification
- Representative commodities/samples for validation of analytical procedures





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"Method Validation and Quality Control Procedures for Pesticide Residues Analysis in Food and Feed"

- Analytical method validation and performance criteria
 - Qualitative screening methods
 - Initial method validation
- Acceptability of analytical method performance extended method validation
 - On-going performance verification (routine recovery determination)
 - Fat or dry weight content determination
- Acceptability of analytical performance for routine recoveries





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"Method Validation and Quality Control Procedures for Pesticide Residues Analysis in Food and Feed"

- Proficiency testing and analysis of reference materials
- Confirmation of results
 - Identification
 - Mass spectrometry coupled to chromatography
- Reporting of results
 - Expression
 - Calculation
 - Rounding
 - Uncertainty



Key Elements on Method Performance

- Accuracy / Trueness
- **Precision**
- Specificity & selectivity
- Limit of Detection (LOD)
- Limit of Quantitation (LOQ)



Guidance on Accuracy / Trueness Requirements

	CODEX	<u>EU</u>	<u>EU</u>	PRC(HK)
Analyte level	CAC-GL 40- 1993	SANCO/ 10684/2009	2002/657/EC*	HOKLAS Supp. Criteria No.37
≦ 1 μg/kg	50-120		50-120 ²	40-120
$> 1 \mu g/kg \le 0.01 mg/kg$	60-120		70-110 ²	60-115
$> 0.01 \text{ mg/kg} \le 0.1 \text{ mg/kg}$	70-120	70-120 ¹		
> 0.1 mg/kg ≤ 1 mg/kg	70-110		80-110 ²	80-110 ³
> 1 mg/kg	70-110			

Note:

- * Represented as recovery ranges from certified/true/spike values for direct comparison, deviation ranges given in the actual guidance documents.
- ¹ Recoveries outside this range may be accepted for certain justified cases, typically with multiresidue methods. Mean recovery below 70% may be acceptable in exceptional case where recovery is low but consistent (i.e. demonstrating good precision) and the basis for this is well established (e.g. due to pesticide distribution in partition).



³ More stringent requirements for levels above 100 mg/kg.



Guidance on Precision Requirements

	CODEX	<u>EU</u>
Analyte level	CAC- GL40-1993	SANCO/ 10684/2009
	(CV, %)	(RSD, %)
≦1 μg/kg	35	
$> 1 \mu g/kg \le 0.01 mg/kg$	30	Maria Sala
$> 0.01 \text{ mg/kg} \leq 0.1 \text{ mg/kg}$	20	20
> 0.1 mg/kg ≤ 1 mg/kg	15	
> 1 mg/kg	10	

	PRC
Analyte level	GB/T 27404-2008
	(CV, %)
0.1 μg/kg	43 %
1 μg/kg	30 %
10 μg/kg	21 %
100 μg/kg	15 %
1 mg/kg	11 %
10 mg/kg	7.5 %
100 mg/kg	5.3 %
1000 mg/kg	3.8 %
1 %	2.7 %
10 %	2.0 %
100 %	1.3 %



Specificity & Selectivity

- Codex CAC/GL 40-1993 (Rev. 2003, Amend. 2010)
 - Analyse ≥ 5 blanks of each representative commodity obtained preferably from different sources. Report analyte equivalent of blank response
 - Lowest calibrated level (LCL) ≤ 0.3 × Accepted Limit (AL) (preferably, except when AL ≥ LOQ)
 - Relative retention value (RRt): ± 2% (GC); ± 5% (HPLC)



Specificity and Selectivity

- EU SANCO/10684/2009
 - Response in reagent blank and control samples being less than 30% of LOQ
 - Identification requirements for different types of MS

MS Mode	Typical systems / example	Acquisition	Requirements for identification
MS (std. mass res.)	Quad., Ion trap, TOF	Full scan, Limited m/z range, SIM	≥ 3 diagnostic ions (preferably incl. quasi-molecular ion)
MS (high res. / high mass)	TOF, Orbitrap, FTMS, Magnetic sector	Full scan, Limited m/z range, SIM	≥ 2 diagnostic ions (preferably incl. quasi-molecular ion). Mass accuracy < 5 ppm. At least one fragment ion.
MS/MS	QQQ, Ion trap, Hybrid MS (e.g. Q-TOF, Q-trap)	SRM/MRM, Full scan product- ion spectra	≥ 2 product ions



Specificity and Selectivity

- EU SANCO/10684/2009
 - Guidance on relative ion abundance ratio from Chromatographic – MS techniques

Relative intensity (% of base peak)	EI-GC-MS (relative)	CI-GC-MS, GC-MS ⁿ , LC-MS, LC-MS ⁿ (relative)
> 50 %	± 10 %	± 20 %
> 20 % to 50 %	± 15 %	± 25 %
> 10 % to 20 %	± 20 %	± 30 %
≤ 10 %	± 50 %	± 50 %

(Also in HOKLAS Supplementary Criteria No. 37)

- Relative retention time (RRT):
 - \Rightarrow ± 0.5 % (GC); ± 2.5 % (HPLC) with suitable IS
 - > ±5% (HPLC) without suitable IS



Limit of Detection (LOD)

- Codex CAC/GL 40-1993 (Rev. 2003, Amend. 2010)
 - "Smallest concentration where the analyte can be identified. Commonly defined as the minimum concentration of analyte in the test sample that can be measured with a stated probability that the analyte is present at a concentration above that in the blank sample."
- Codex Alimientarius : 19th Procedural Manual (2010)
 - For ML ≥ 0.1 mg/kg, LOD ≤ ML x ¹/₁₀
 For ML < 0.1 mg/kg, LOD ≤ ML x ¹/₅
 (ML = specified level of a specified commodity)
 (Also in HOKLAS Supplementary Criteria No. 37)



Limit of Detection (LOD)

- EU SANCO/10684/2009
 - Not explicitly defined
 - Adoption of a "reporting limit" at the LCL avoids the unjustifiably high cost of confirming the presence, or absence, of residues at unnecessarily low levels



Limit of Quantitation (LOQ)

- Codex CAC/GL 40-1993 (Rev. 2003, Amend. 2010)
 - "Smallest concentration of the analyte that can be quantified. Commonly defined as the minimum concentration of analyte in the test sample that can be determined with acceptable precision (repeatability) and accuracy under the stated conditions of the test."
- Codex Alimientarius : 19th Procedural Manual (2010)
 - For ML ≥ 0.1 mg/kg, LOQ ≤ ML x ¹/₅
 For ML < 0.1 mg/kg, LOQ ≤ ML x ²/₅</p>
 (ML = specified level of a specified commodity)
 (Also in HOKLAS Supplementary Criteria No. 37)



Limit of Quantitation (LOQ)

- EU SANCO/10684/2009
 - "The minimum concentration or mass of the analyte that can be quantified with acceptable accuracy and precision. Should apply to the complete analytical method."
 - "Lowest validated spike level that meets the method performance acceptability criteria"
 (mean recoveries: 70-120%, RSD ≤ 20%).
 - ➤ ≤ Reporting limit and MRL



Codex CAC/GL 40-1993 (Rev. 2003, Amend. 2010)

Plant products				
Commodity Group	Common properties	Commodity class	Representative species	
I	High water and	Leafy vegetables	spinach or lettuce	
	chlorophyll content	Brassica leafy vegetables	broccoli, cabbage, kale	
		Legume vegetables	green beans	
II.	High water and low	Pome fruits	apple, pear	
	or no chlorophyll content	Stone fruits	peach, cherry	
	Content	Berries	Strawberry	
	Small fruits	grape		
	Fruiting vegetables	tomato, bell pepper, melon		
		Root vegetables	Mushroom	
			potato, carrot, parsley,	
III.	High acid content	Citrus fruits	orange, lemon	
IV.	High sugar content		raisins, dates	
V.	High oil or fat	Oil seeds	avocado, sunflower seed	
		Nuts	walnut, pecan nut, pistachios	
VI.	Dry materials	Cereals	wheat, rice or maize grains	
		Cereal products	wheat bran, wheat flour	
	Commodities requiring individual test		e.g. garlic, hops, tea, spices, cranberry	

Products of animal origin			
Commodity Group	Common properties	Commodity class Representative species	
		Meats	Cattle meat, chicken meat
		Edible offals	Liver, kidney
		Fat	Fat of meat
		Milk	Cow milk
		Eggs	Chicken egg



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	Vegetables, fru	uits and cereals
Commodity groups	Commodity categories	Typical representative commodities included in the category
High water	Pome fruit	Apples, pears
content	Stone fruit	Apricots, cherries, peaches
	Bulb vegetables	Bulb onion
	Fruiting vegetables/cucurbits	Tomatoes, peppers, cucumber, melon
	Brassica vegetables	Cauliflower, Brussels sprout, cabbage, broccoli
	Leafy vegetables and fresh herbs	Lettuce, spinach, basil
	Stem and stalk vegetables	Leek, celery, asparagus
	Forage/fodder crops	Fresh alfalfa, fodder vetch, fresh sugar beets
	Fresh legume vegetables	Fresh peas with pods, petit pois, mange tout, broad bean, runner bean, dwarf French bean
	Leaves of root and tuber vegetables	Sugar beet and fodder beet tops
	Fresh Fungi	Champignons, chanterelles
	Root and tuber vegetables or feed	Sugar beet and fodder beet roots, carrot, potato, sweet potato

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Vegetables, fruits and cereals			
Commodity groups	Commodity categories	Typical representative commodities included in the category	
High oil content	Tree nuts	Walnut, hazelnut, chestnut	
	Oil seeds and products	Oilseed rape, sunflower, cotton- seed, soybeans,	
	thereof	peanuts, sesame etc. Oils and pastes (e.g. peanut	
		butter, tahina) thereof,	
	Oily fruits and products	Olives, Avocados and oils and pastes thereof	
High starch and/or	Dry legume	Field bean, dried broad bean, dried haricot bean	
protein content &	vegetables/pulses	(yellow, white/navy, brown, speckled)	
low water & fat content	Cereal grain and products	Wheat, rye, barley and oat grain; maize, rice,	
	thereof	wholemeal bread, white bread, crackers, breakfast	
		cereals, pasta	
High acid content &	Citrus fruit	Lemons, mandarins, tangerines, oranges	
high water content	Small fruit and berries	Strawberry, blueberry, raspberry, Black currant, red	
		currant, white currant, grapes	
	Other	kiwifruit, pineapple, rhubarb	
High sugar &	Dried fruit	Raisins, dried apricots, dried plums, fruit jams	
low water content			
"Difficult or unique		Hops Cocoa beans and products thereof, Coffee, Tea	
commodities"*		Spices	

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Products of animal origin			
Commodity groups	Commodity categories	Typical representative commodities included in the category	
Meat	Red meat	Beef, pork, lamb, game, horse	
	White meat	Chicken, duck, turkey	
	Fish	Cod, haddock, salmon, trout,	
	Offal *	Liver, kidney	
	fat from meat		
Milk & milk	Milk	Cow, goat and buffalo milk	
products	Cheese	Cow, goat cheese	
	Yogurt		
	Cream		
	Butter		
Eggs	Eggs	Chicken, duck, quail, goose eggs	
Honey	Honey		



Offal (liver, kidney) should be validated separately, if necessary

Thank you

