

Annex: Comments on DG (Sanco)/8117/2006-MR Draft

Pg. 5 Abbreviations and Special Terms Used in Report

FDA Food and Drug Administration
MOAB Marketing Order Administration Branch

Pg. 6 1. Introduction

Para 3 : Washington, **DC**

Pg. 9 MAIN OBSERVATIONS

COMPETANT AUTHORITIES

5.2.1. Para 4: The USDA AMS staff oversee this work through **10 Federal Program Managers using the Branch Internal Quality Management System (BIQMS)**.

Para 5: Within the USDA there is also a research department (The **Agricultural Research Service (ARS)**).

Para 7: The approval of laboratories which are approved by the USDA for the analysis of aflatoxins in peanuts **for domestic requirements** is conducted by the staff of the USDA Science and Technology **Programs** of the AMS.

5.2.2. Para 1: It is responsible for overseeing the **barcode lot identification system**.

Pg.10 5.2.3. Para 1: **Positive Lot Identification (PLI)**

Pg.11 5.2.6. Para 2: The National Peanut Board is a USDA entity with members from industry appointed by the USDA that **conducts research and promotion activities**.

Pg. 13 PROCESS CONTROLS IN THE NUT PRODUCTION CHAIN

5.3.2. Para 8: When a blanched lot is to be exported to Europe the lot **may lose** its original.....

Para 8: **(end of paragraph, new sentence) In that regard the APC will establish a policy for official USDA PLI, sampling and testing.**

Para 11: The companies visited are not regularly **audited** by the CCA.

Pg. 14 METHOD OF SAMPLING FOR NUT CONSIGNMENTS

5.4.1. Para 4: It is then sent with the above-mentioned “Notice of Sampling” to the relevant **USDA or USDA approved laboratory.**

Pg. 15 LABORATORY SERVICES

5.6. Para 2: Following review of submitted documentation the laboratory receives from AMS five **spiked** peanut samples of known contamination levels.

Para. 5: Each laboratory maintained on the approved list is then subject to an annual **review** and participate in a proficiency test analysis on samples sent by AMS.

Para 6: This includes the **preparation and dissemination** of proficiency test samples described above.

Pg.16 LABORATORIES VISITED

5.6.1. Table 1: USDA Blakely: * **LIMS is currently being set-up in the USDA Laboratory in Blakely, Georgia and will be available January 2007.**

Validation: **Recovery rates are developed daily at the USDA laboratory in Blakely, Georgia.**

Pg. 17 Quality Assurance: **(34 samples annually)**

Recovery (%) Analytical uncertainty: **Recovery rates for B1 have begun at the USDA laboratory in Blakely, Ga.**

Low values represent PPB. SOP's updated and uncertainty levels calculated using the Horowitz equation.

Pg. 18 Para 4: (5 known and unknown levels of aflatoxin are prepared by the **USDA laboratory in Blakely, Ga.)**

Add sentence at end of paragraph. **The policy of obtaining check samples from the same private laboratory group will be changed so as not to appear as a conflict of interest.**

Para 5: Add sentence at the end of paragraph. **The USDA laboratory in Blakely, Ga. now reports uncertainties for B1 and total aflatoxin.**

Para 6: **USDA laboratories can correct and report for recovery.**

Pg. 19 Para 1: **The USDA/AMS has requested and is now receiving RASFF and is taking the appropriate action.**

Pg. 20 CONCLUSIONS

6.2. Competent Authorities

(4) The APC is an industry body that also **disseminates** and plays an important role in the co-ordination and communication with the industry **as it relates to peanut standards.**