Currently the MRLs used in residue control in foodstuffs of animal origin are based on legislation on veterinary medical products, according to which the consumer safety of a pharmacologically active substance must be determined. However, the problems in residue control arise from other substances than those having an established MRL by EMEA. It is important that these other substances like feed additives will have published MRLs. Equally important is that there are effective tools (e.g., MRPL) which must be harmonised and based on accepted facts for use in surveillance.

1. Structures for the appropriate differentiation of risk assessment and risk management for the evaluation and control of residues in food of animal origin
   - Differentiation of risk assessment and risk management should follow the guidelines of Codex Alimentarius
   - Residue control should be in general more based on risk assessment
   - Risk management decisions in cases of lacking risk assessment by EMEA should be based on risk assessment by EFSA

2. Procedures for extrapolation of maximum residue limits
   - Extrapolation of MRL:s are supported but also with taking into account the specific features of some substances. It has to be considered whether species specific MRLs are really needed. Also the economical influence of extrapolation should be considered in relation to the authorization process by EMEA.

3. Procedures for provision of reference points for control purposes
   - Legislation should harmonize the definition ‘food producing animals’, also the category of horses. According to Finnish legislation, horses are food producing animals. It should be clearly defined, how the directive 96/22 should be read in relation to horses never to be slaughtered for human consumption.
   - The enforcement of control of residues of a substance listed in Annex II in food of animal origin is problematic. Substances do not present a hazard if used correctly but some of them can be used incorrectly e.g., for growth promoting. On the other hand Annex II substances has been given a safe status and no MRLs are needed. However, the re-evaluation of some substances (endogenous hormones, vitamin A) should be considered.
   - The interpretation of cascade use of substances in accordance with Articles 10 and 11 of Directive 2001/82/EC in exceptional circumstances should be harmonized in MS. An example could be the use of antibacterial drugs to bees.
• There should be a solid base for selecting the substances that MRPLs are given. It should also be possible to change the values when needed. Which authority makes the MRPL decisions should be defined. MRPLs should not decrease the development of more sensitive methods.

4. Procedures for precautionary measures for substances in imported foodstuffs
• Zero tolerance is not a solid base in cases where a substance has JECFA evaluation with a proposed MRL. Community should be active in supporting the use of MRLs proposed by JECFA.

5. Procedures for short-term risk assessments in crisis situations
• An expert network should assess the risk to consumers at the time the laboratory results are published

6. Procedures for the evaluation of Third Countries residue control measures
• The Commission should also in future be responsible for the evaluation of Third Countries residue control measures and provide adequate information to MS

7. Procedures for the nomination of Community reference laboratories
• CRLs are an important support to NRLs and should continue at the same level also after the acceptance of new MS in the community

8. Procedures for the establishment of plans for monitoring and targeted controls
• Assessment of general consumer exposure to residues is not feasible within residue monitoring plans. In addition to that, current problems in residue control programs do not compromise consumer exposure to residues
• Timeframe and procedure of the targeted residues control could be reconsidered. It should be possible to change the plan during the year according to positive findings. Currently 96/23 article 8 point 3 requires MS to send results twice a year but this is not the practise, could this help?
• Environmental contaminants give valuable information although number of samples could be reduced. In some cases the minimum number of samples requested by 96/23 is relatively high as compared to small production figures and increases economical load per production unit

9. Financing of measures of interest to the Community related to food safety
• Financing to national residue control program is currently collected from food industry according to EU legislation. It is important also in future to let MS to establish the national level for finance to meet the actual costs. However, in cases where the polluter is not national, the Community should consider taking the response of finance.

10. Residue control specific enforcement measures
• The results by every MS should be published yearly. Microbiological screening methods should be harmonised in the community as well as withdrawal periods should be harmonised
• The bases for the safety evaluation for different substances under different legislation should be harmonised to achieve a high level consumer protection
• Terminology: The reflection paper discuss of pharmacologically active substances. However residue control includes many other substances, too

Done in Helsinki, 19. March 2004

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