

## Advice 17-2018 of the Scientific Committee of the FASFC on the action limits for residues of pesticides in fishery products and aquaculture products

### Background & Terms of reference

The control plan of the FASFC foresees in the detection of residues of pesticides in fishery and aquaculture products. These analyses comply with the obligatory monitoring that is stipulated in Directive 96/23/EC.

At present, an *ad hoc* risk assessment is conducted in case of detection of residues of pesticides in fishery and aquaculture products. This risk assessment is based on MRL values (Maximum Residue Limit) for residues in other matrices of animal origin.

Given the fact that European regulation provides no MRL values for residues of pesticides in fishery and aquaculture products, the Scientific Committee is asked to evaluate if action limits, based on MRL values in other matrices/species, can be proposed. If the latter appears not possible, an alternative method for the determination of these action limits is demanded.

### Methodology

The current opinion is based on available data from scientific literature, in combination with expert opinion.

To compile the list of pesticides to be included in the control program, the Scientific Committee has taken into account the results of monitoring programs for pesticides in surface water (freshwater), sediments and water organisms in the Flemish and Walloon regions and on the results of pesticide monitoring in French marine environments. This list has subsequently been refined based on the frequency of detection and on the bio-accumulation properties of each pesticide.

Because the Scientific Committee is not in favor of using MRL values for other animal species in the calculation of possible action limits for pesticides in fishery and aquaculture products, the methodology described in the document “Inventory of actions and action limits and proposals for harmonization within the framework of official controls: Part 1 Action limits for chemical contaminants” (FASFC, 2017) was preferred. For the estimation of consumption data a conservative approach was used by selecting a large daily consumption of Belgian consumers mentioned in the EFSA comprehensive European Food Consumption Database. Therefore, a chronic consumption value of fishery and aquaculture products at the 97,5<sup>th</sup> (P97,5) percentile amongst children, given their low body weight, was selected.

### Results

Based on the aforementioned monitoring data in fresh and salt waters and on a number of selection criteria, a list with 68 pesticides was obtained (see [Annex](#)). It is advised to use this list for the organization of the control plan for pesticides in fishery and aquaculture products. Based on the above mentioned consumption data and on the Acceptable Daily Intake (ADI) value for each pesticide, an action limit could be calculated. For pesticides without permission for use in the EU, it is advised to use a standard action limit of 0,01 mg/kg.

## Conclusions

The Scientific Committee has reviewed the list of pesticides to be included in the control program for fish and fishery products of the FASFC.

The Committee is not in favor of using the proposed approach based on MRL values for other animal species for the determination of action limits for pesticides in fishery and aquaculture products, because this methodology does not provide a fair representation of consumer risks as a result of exposure to pesticides during consumption of these fishery and aquaculture products. Instead, the Committee proposes to calculate the action limit based on the ADI value and on specific consumption data for fishery and aquaculture products.

The list with pesticides and their proposed action limit can be found in annex.

The full text is available on this website in dutch and in french.