

Pre-marketing control of fresh fruits  
and vegetables to assure compliance  
with the buyers specifications

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# Objectives

- Interpret the maximum limits from the perspectives of producers and official control.
- Use of combined uncertainty for establishing action and decision limits by the producers and buyers, respectively.
- Illustrate the principles with practical examples.



# Basic definitions – legal limits

- **Maximum level (ML)**

For contaminants, naturally occurring toxicants and nutrients, the maximum concentration of a substance recommended by the Codex Alimentarius Commission to be legally permitted in a given commodity. It applies to the average concentration of the chemical in samples meeting the minimum mass and sample size requirements

- **Maximum residue limit (MRL, ML) for pesticide residues**

The maximum concentration of a pesticide residue (expressed as milligrams per kilogram) to be legally permitted in or on food commodities and animal feed. MRLs for meat and poultry apply to a bulk sample derived from a single primary sample, whereas MRLs for plant products, eggs and dairy products apply to the average residue in a specified portion of the composite bulk sample derived from 1-10 primary samples.

# Control of the commodities

There are two distinctly different situations which needs different sampling plans:

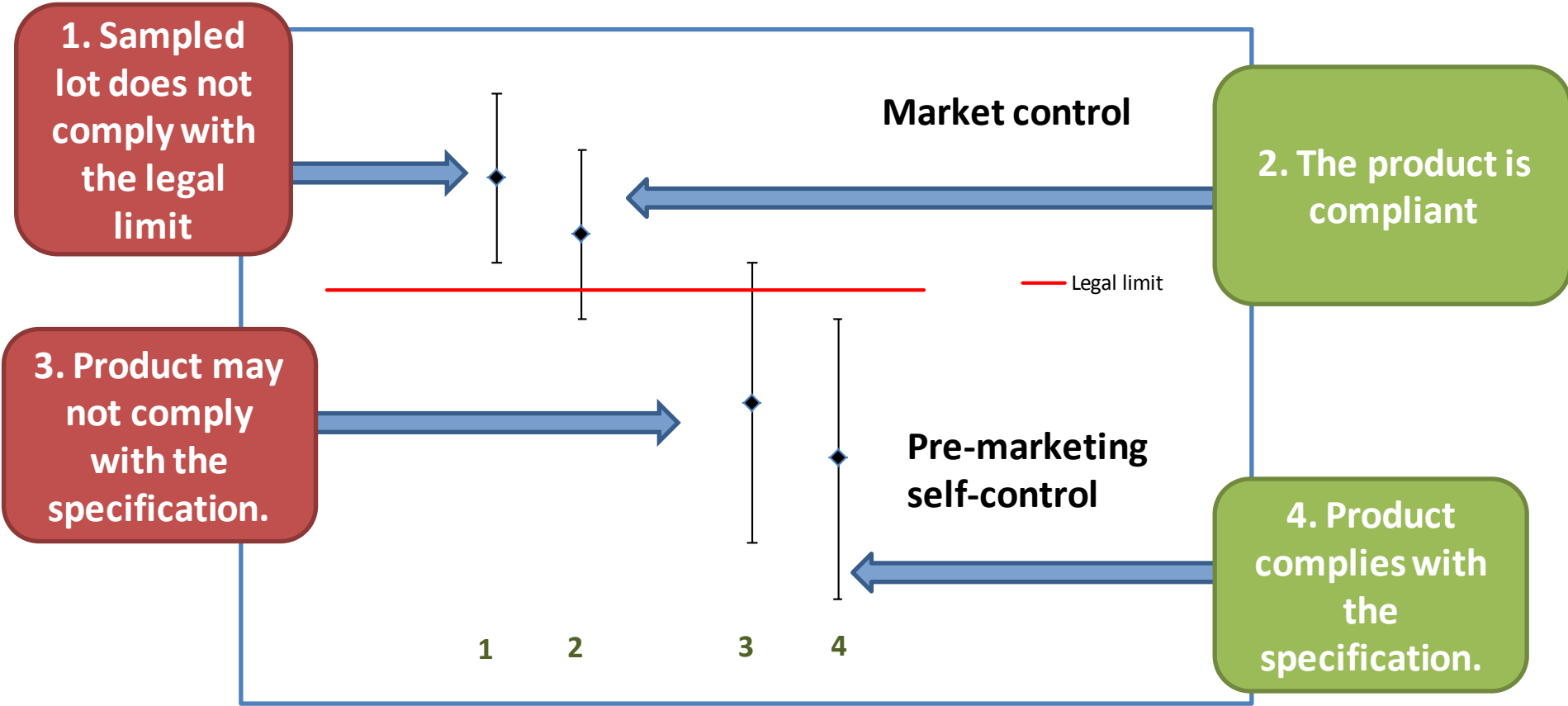
## Premarketing self-control

- it has to be certified that at least a specified proportion of the product in terms of the minimum size and mass of bulk/laboratory sample complies with the legal limit
- the combined uncertainty including sampling uncertainty ( $CV_R$ ) shall be taken into account

## Control of commodities on the market

- a lot is considered non-compliant if the measured analyte concentration corrected for recovery, where specified, minus the expanded uncertainty of the results are above the legal limit.
- the combined uncertainty of the measured concentration ( $CV_L$ ) shall only be taken into account (excluding the sampling uncertainty)

# Illustration of the consideration of combined uncertainty of the measurement result



# Distributions of contaminants in food

If the measured value is compared to the legal limit the chance of wrongly declaring a lot to be compliant depends on the distribution of the measurand in the tested food.

- if the tested commodity is homogenous in term of the contaminant (aflatoxin M1 in milk), then the uncertainty of the analytical measurement (e.g. 15% for ELISA-based detection of aflatoxin M1) need only to be considered ;
- the pesticide residues in fruits and vegetables, and ochratoxin in pistachio are distributed approximately following lognormal distribution; in case of pesticide residues the  $CV_R$  of 35-45% shall be taken into account.
- due to the very patchy distribution of aflatoxins in nuts, cereals, etc. their distribution can be best described with negative binominal function; the  $CV_R$  around 60-70% can be expected.



OBJECTIVE: Combined uncertainty of results ( $S_{Res}$ ) should be as low as practically possible

$$S_{Res} = \sqrt{S_S^2 + S_L^2}$$

$$CV_{Res} = \sqrt{CV_S^2 + CV_L^2}$$

$$CV_{Lc} = \sqrt{CV_{SS}^2 + CV_{Sp}^2 + CV_A^2}$$

Ring tests, proficiency tests and internal quality control provide information only for  $CV_A$

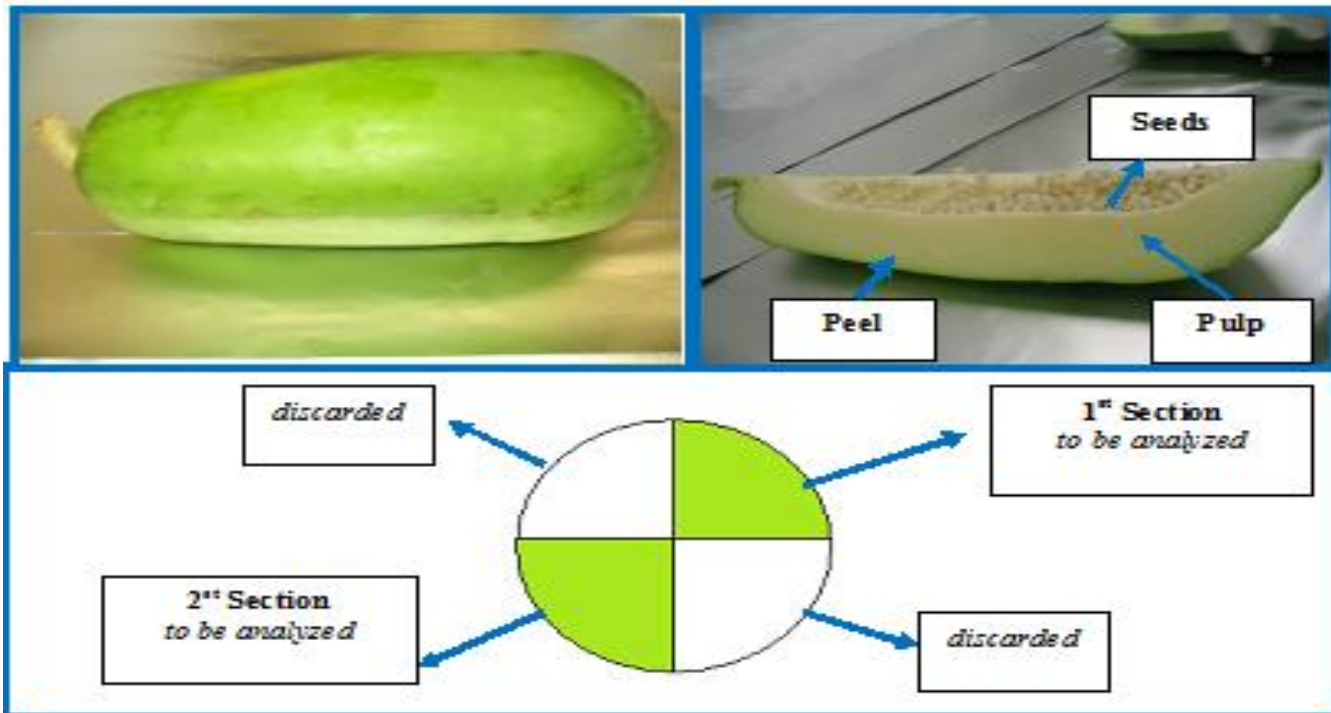
What do we know about the contribution of  $CV_S$ ,  $CV_{SS}$ ,  $CV_{Sp}$  ??

# Sample size reduction $CV_{SS}$





# Sample size reduction



## Internal quality control

Regularly re-analyse replicate test portions at different time intervals.

Select replicate results which are within the 95% critical range.

2 replicates:

$$C_{\max} - C_{\min} = CD = 2.8 CV_{Ltyp} \bar{R}$$

3 replicates

$$C_{\max} - C_{\min} = CD = 3.3 CV_{Ltyp} \bar{R}$$

# Determination of $CV_L$

- Calculate their relative standard deviations from the results of replicate test portions :

$$R_{\Delta i} = 2(R_{i1} - R_{i2}) / (R_{i1} + R_{i2})$$

$$CV_{Lab} = \sqrt{\frac{\sum_{i=1}^n R_{\Delta i}^2}{2n}}$$

$$CV_L = \left( \frac{\sum R_{\Delta i}}{n} \right) / 1.128$$

$v = n$   
(# : number of replicate test portions)

For 2 replicates

# Effect of particle size

Gy's sampling  $RSD=CV_{Sp}$

$$CV_{Sp} = Cd^3F = Cd^3 \left( \frac{1}{M_{TP}} - \frac{1}{M_{AS}} \right)$$

$C$ : shape factor,

$d$ : upper 95% of particle size,

$M_{TP}$ : extracted test portion,

$M_{AS}$ : mass of homogenised portion of sample

$M_{AS}=1000$  g  $M_{TP}$ : 25g (**F=0.039**); 10g (**F=0.099**); 5g (**F=0.199**); 2 g (**F=0.499**)

Ingamells' sampling constant:

$$K_s = M_{TP} CV_{Sp}^2$$

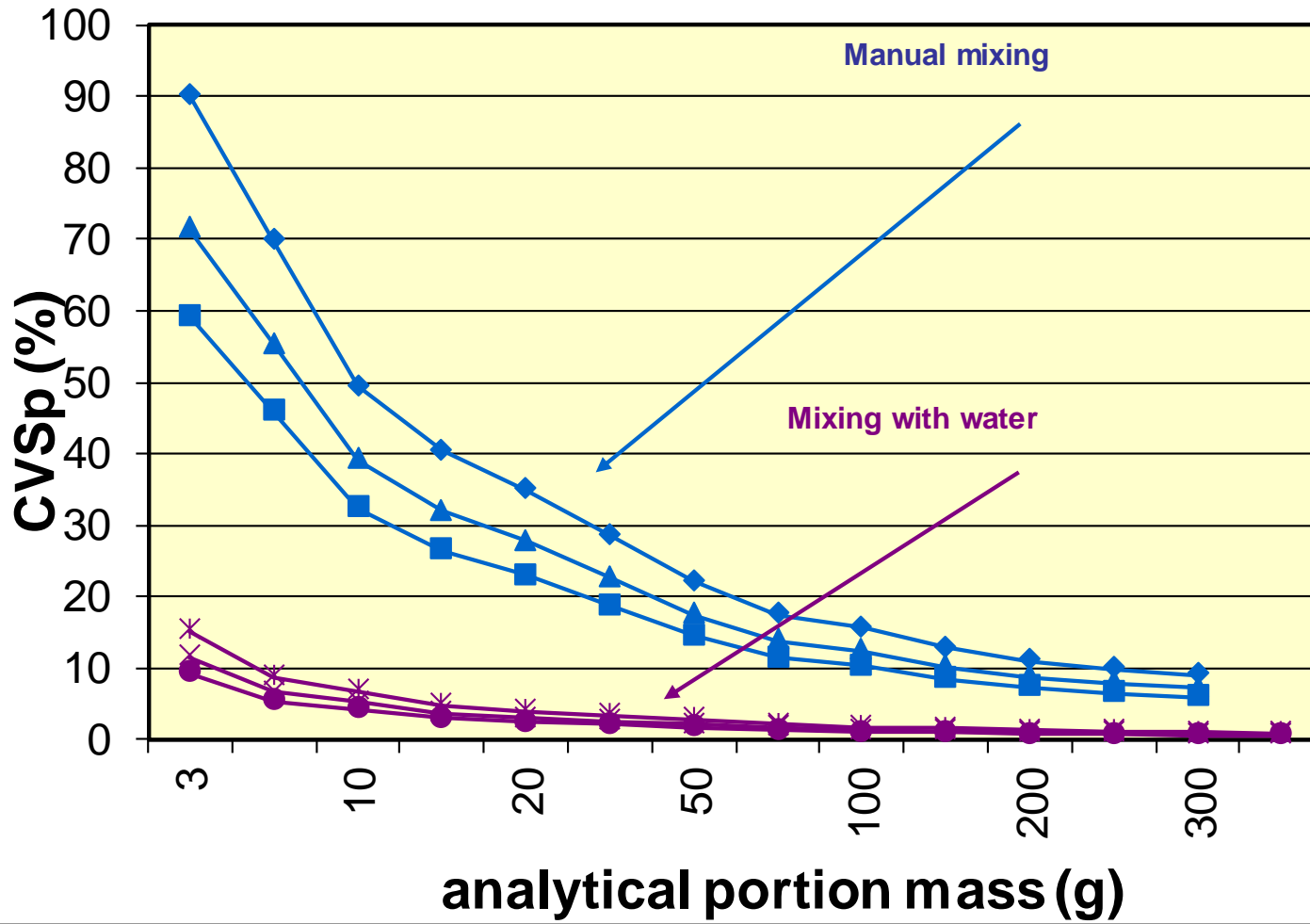
# The effect of test portion size reduction

$$CV_L = \sqrt{CV_{SS}^2 + CV_{SP}^2 + CV_A^2} \quad CV_L = \left( \frac{\sum \Delta}{n} \right) / 1.128$$

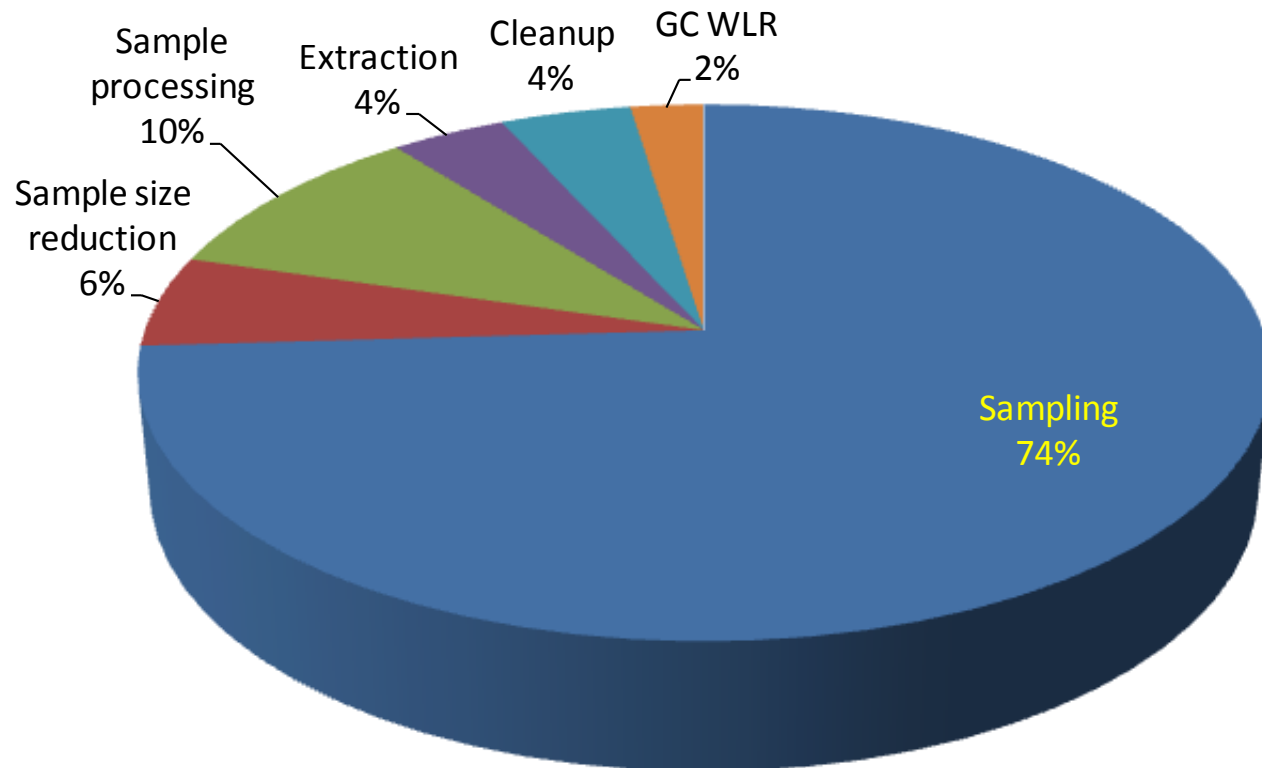
Gy's equation  $CV_S = Cd^3 \left( \frac{1}{M_{Tp}} - \frac{1}{M_{Ls}} \right)$

Test portion $M_{Tp}$ [g]	Mass of laboratory sample ( $M_{Ls}$ )		
	1 kg	2 kg	5kg
	Multiplying factor		
<b>1</b>	<b>15.2</b>	<b>15.1</b>	<b>15.0</b>
2	7.6	7.5	7.5
5	3.0	3.0	3.0
10	1.5	1.5	1.5
<b>15</b>	<b>1.0</b>	<b>1.0</b>	<b>1.0</b>
25	0.6	0.6	0.6
50	0.3	0.3	0.3

## Comparison of sample processing error with water mixing and dry grinding & mixing



# Typical contribution of the steps of pesticide residues determination ( $CV_R=0.38$ ) to the combined uncertainty

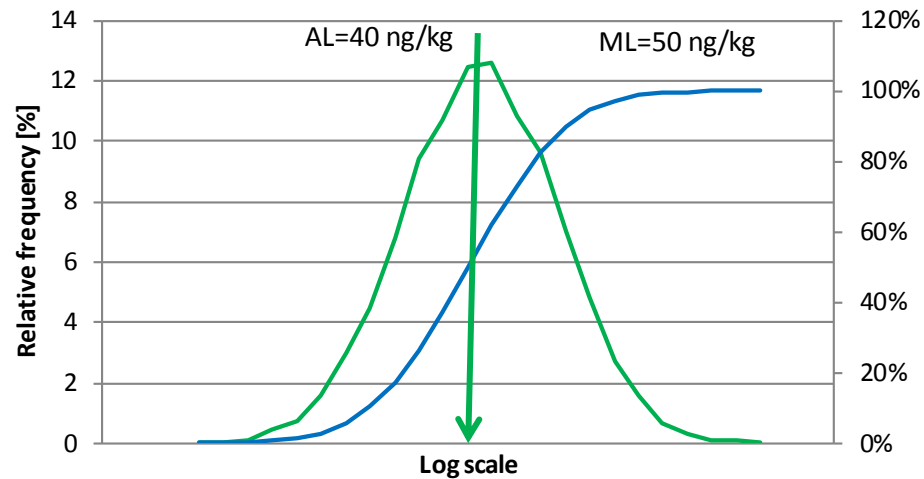


**The  $CV_A$  is only 11%**

# Interpretation of measure values

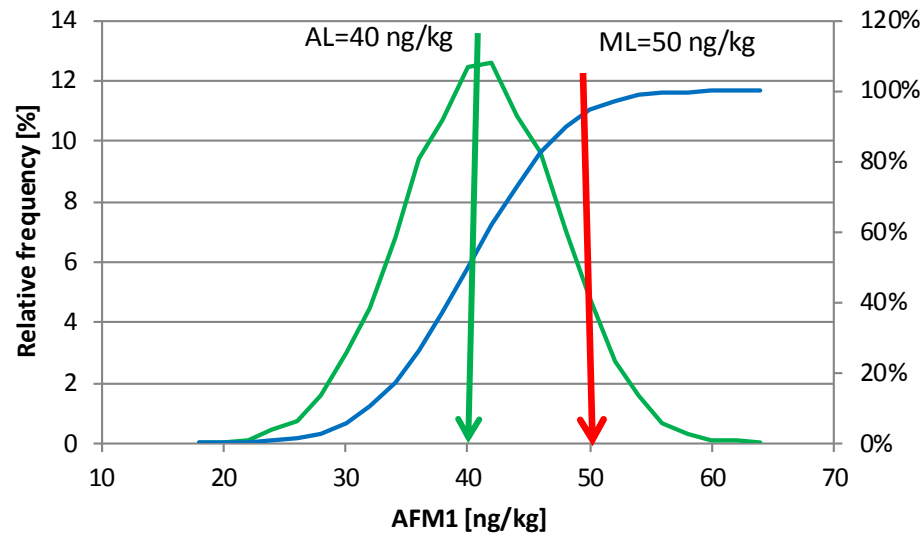


# Microbiological (inexpensive) tests



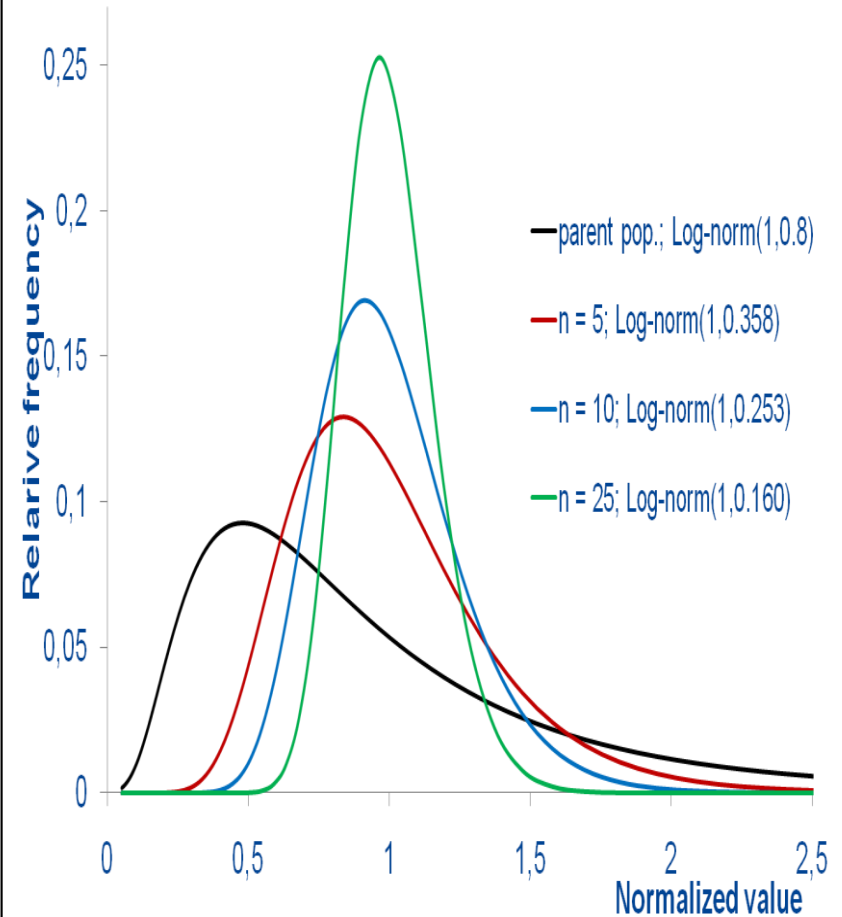
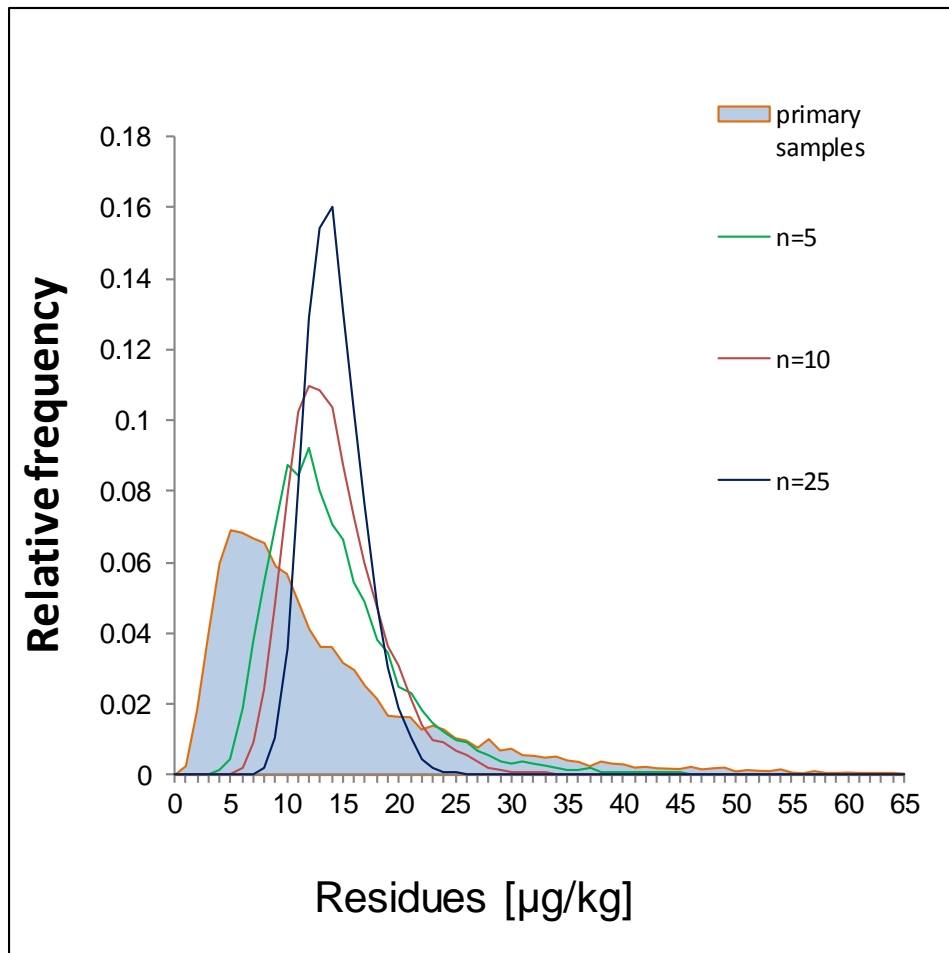
Minimum 5 samples are tested and if all are below permitted cell number, then the probability of making wrong decision is  $0.5^5 = 0.03125 = 3.1\%$

# Relationship of AL and ML in case of determination of AFM1 in milk.



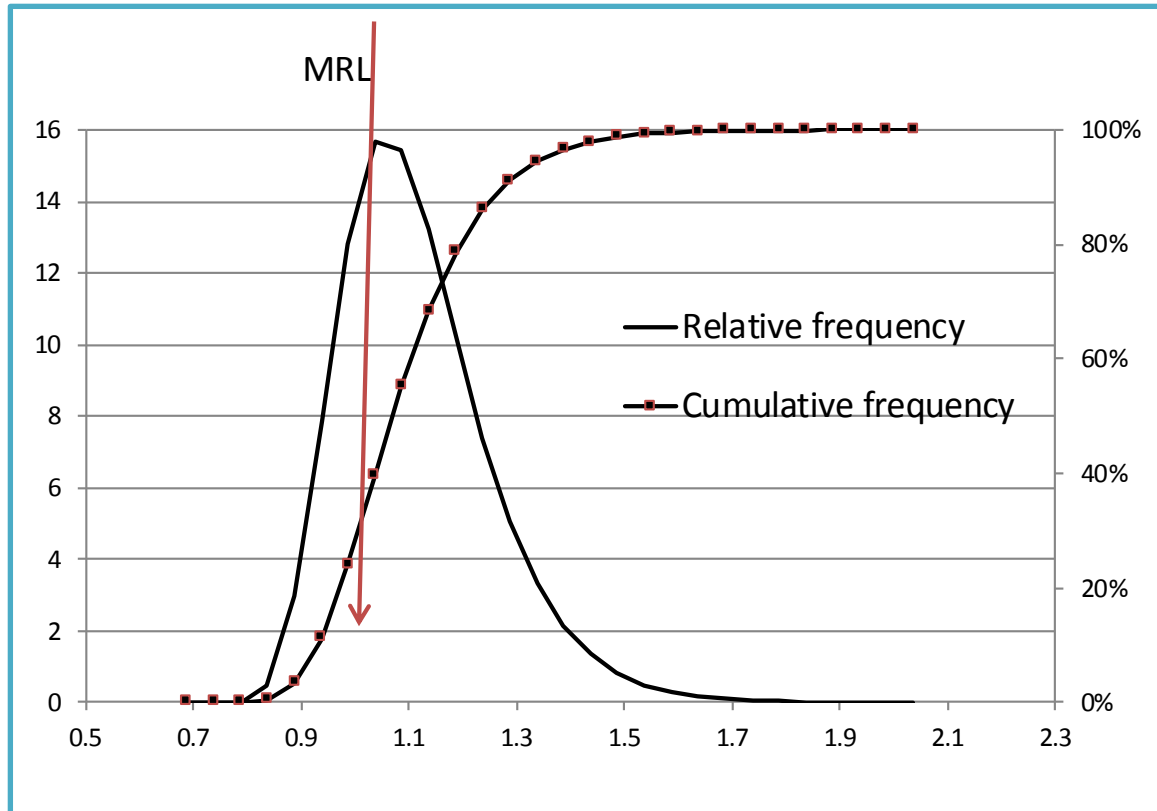
Where the product to be tested can be considered homogeneous such as bulk milk, the sampling uncertainty is practically zero. In this case only the uncertainty of the analytical measurement ( $CV_L$ ) should be taken into account.

# Residue distribution in primary and composite samples



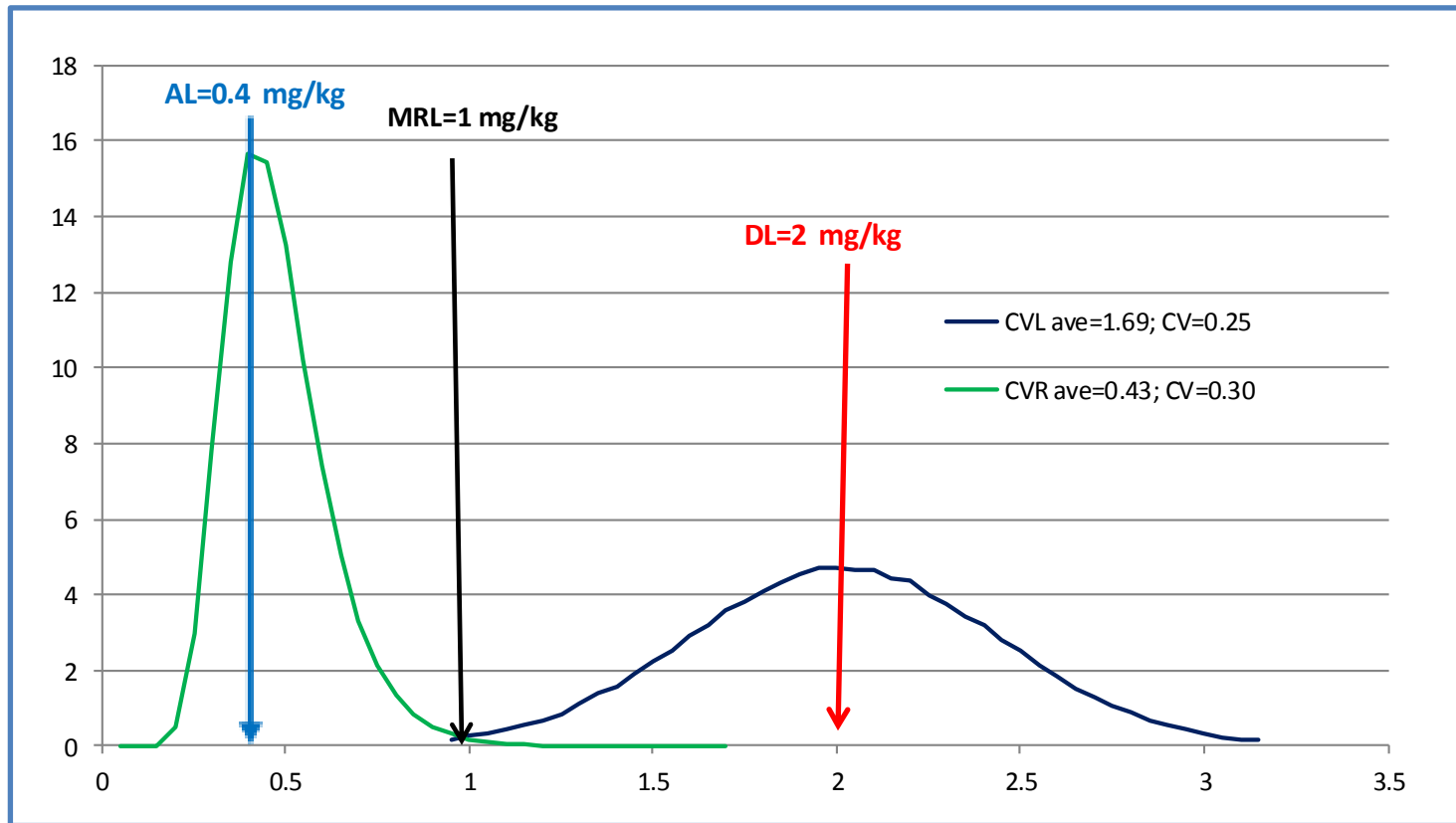
# Comparison of measured value to the MRL/ML

Distribution of residues in apple composite samples.



If we compare contaminants/residues in composite samples to the ML/MRL we would make wrong decision in over 50-70% of the cases depending on the measurand and sample.

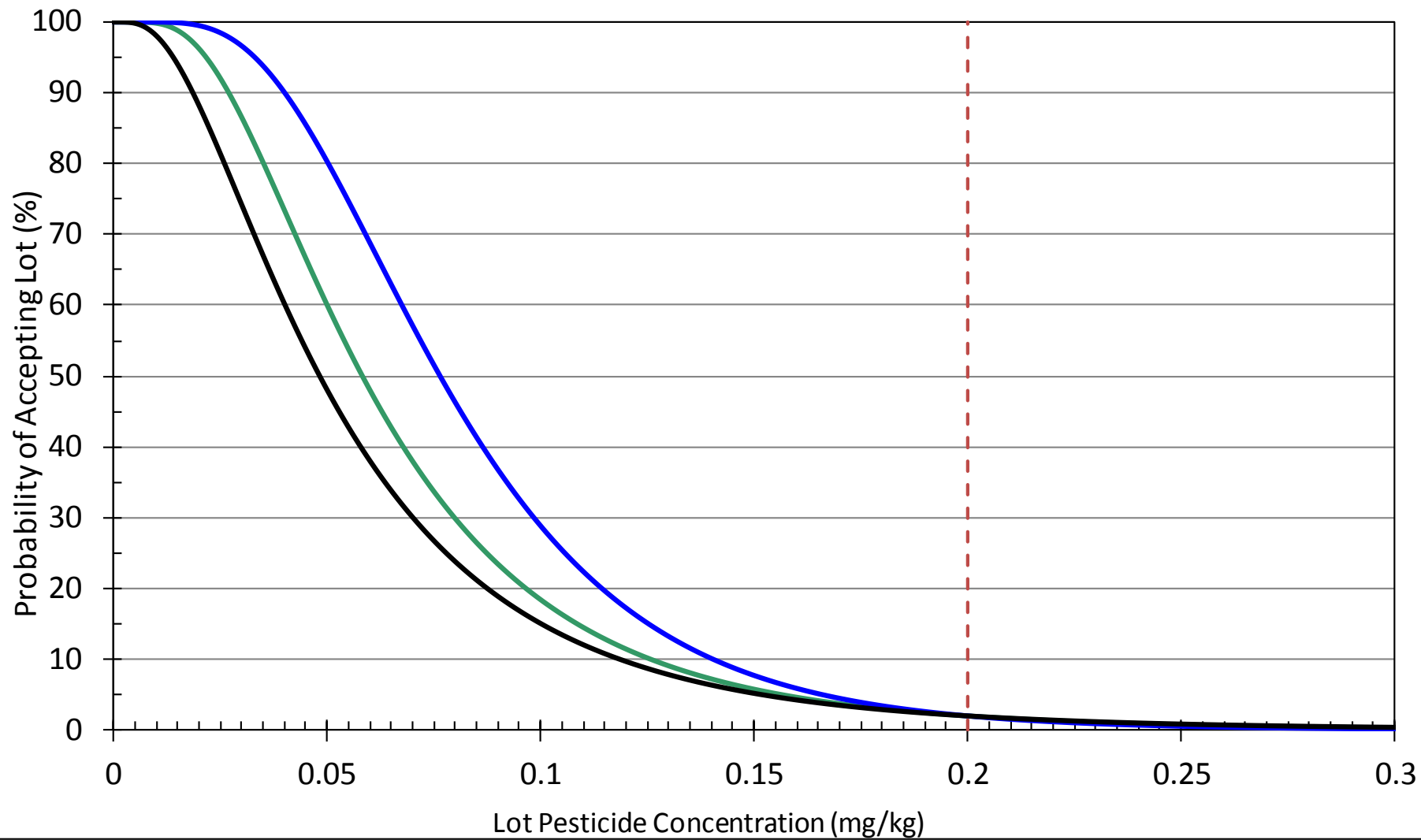
# Relationship of the Action limit (AL) for testing and the decision limit (DL) for verifying compliance with an MRL of 1 mg/kg of an apple lot.



Premarket control: Action limit

Post-market control: Decision limit (expanded uncertainty = 2x SD, CV = 0.25 )

	Curve #1	Curve #2	Curve #3
Number of Laboratory Samples	1	2	2
Number of primary samples	10	10	10
CV <sub>L</sub>	0.15	0.15	1.5
CV <sub>S</sub>	0.642	0.642	0.642
Number of test portion analysed	1	2	3
Action Limit≤ (mg/kg) Forced			
Action Limit≤ (mg/kg) Calc.	0.048	0.088	0.0530
Action Limit≤ (mg/kg) Implemented	0.048	0.088	0.0530
Accept Probability at MRL Calc.	0.020	0.020	0.020
Accept Probability at MRL Desired	0.020	0.020	0.020



— (1) 1x10 primary samples, AL < 0.0486 mg/kg

— (2) 2x10 primary samples, AL < 0.0886 mg/kg

— (3) 2x10 primary samples, AL < 0.053 mg/kg

- - - Legal Limit (MRL)

# Examples of estimated action limits for selected pesticide residues

	MRL mg/kg	AL mg/kg
acephate	0.02*	LD≤0.008
azoxystrobin	3	1.2
chlorpyrifos	0.05*	LD≤0.02
cyfluthrin	0.1	0.04
difenoconazole	1	0.4
indoxacarb	0.3	0.12
tetradifon	0.01*	LD≤0.004



# Calculation of compliance of mycotoxin contamination taking into account the AL or targeted compliance level

Input data

Commodity - mycotoxin combination

Variability of measurand in composite samples.

Mass and number of laboratory sample

$CV_L$  of the laboratory analysis

Test portion size

Web based tool has been developed:

<http://www.fstools.org/mycotoxins/>.

# Template for mycotoxins

Mycotoxin, Commodity	Aflatoxin, Corn , Shelled	Aflatoxin, Corn , Shelled	Aflatoxin, Corn , Shelled
Laboratory Sample Size - ns (kg) =	10.00	10.00	10.00
Number Laboratory Samples - scnt (#) =	2	3	4
Test Portion - nss (g) =	50	50	50
Number of aliquots - na =	1	1	1
Accept/Reject Limit (ng/g) =	2	2	2
Regulatory Limit (ng/g) =	5.0		

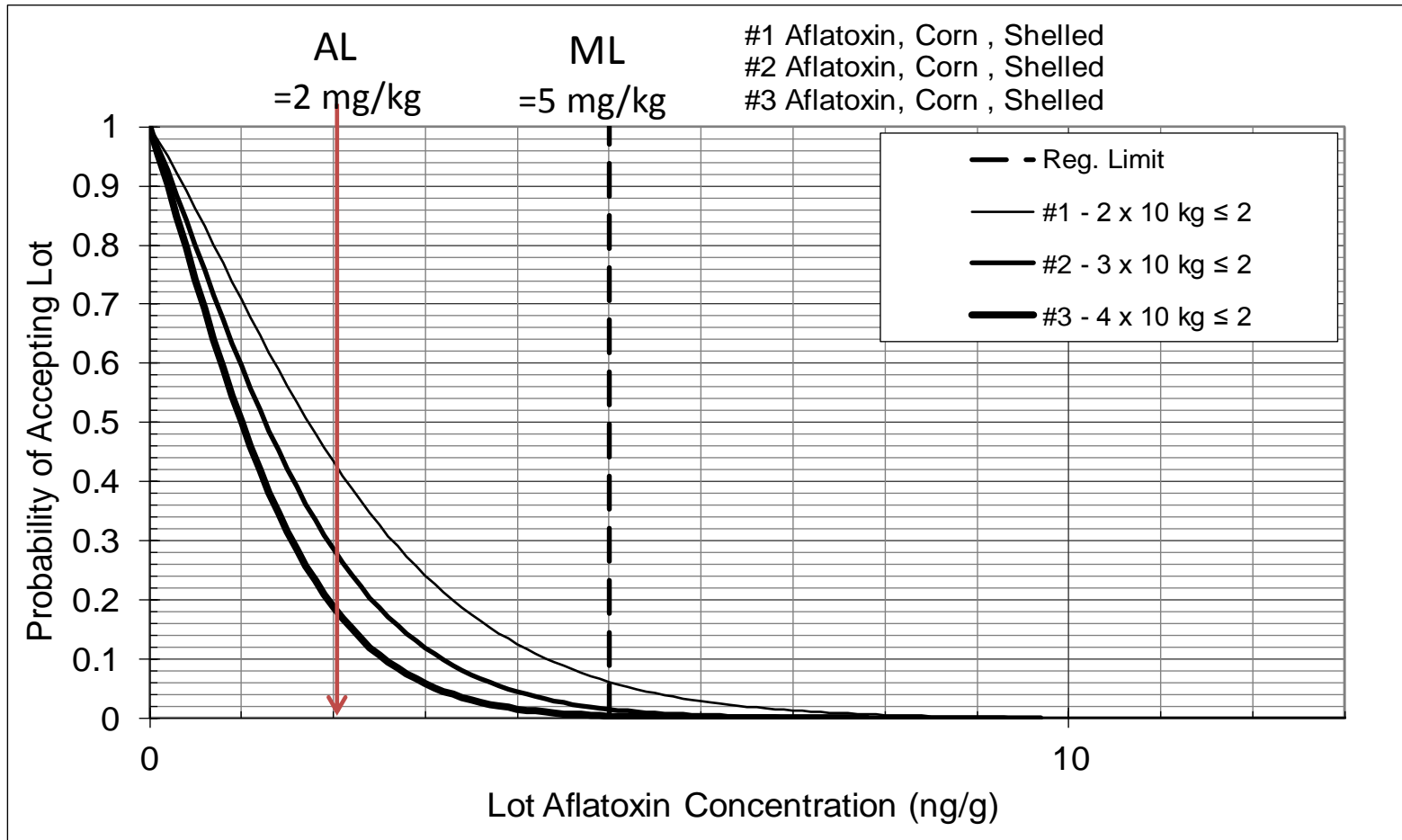
The Mycotoxin Sampling Tool can be accessed at the following website address:

<http://www.fstools.org/mycotoxins/>.

FAO encourages Codex members to use the tool. Feedback on the tool can be sent at [food-quality@fao.org](mailto:food-quality@fao.org)

Additional references on related topics can be found on the web at <http://www.bae.ncsu.edu/usda/www/whitaker1.htm>

# Practical examples



# Conclusions and recommendations

- The concept of the action limit can be applied for the verification of the compliance of a particular lot, or can be used within an early warning control programme.
- AL depends on  $CV_R$  ( $n$ ,  $p$ ,  $ap$ ,  $CV_L$ ) acceptable violation rate
- The sample size (number of primary samples, total mass) should correspond to that specified in relevant legislation.
- Producers should define suitable control points when appropriate action levels (Performance Criterion) can be applied.
- The sampling programme should be based on the precise definition of the sampling frame, weighting the potential risk associated with the production of a given product and the random sampling of the products all over the production cycle.
- Under such conditions the analytical results can be used to verify that the production is under control.



Close collaboration of all stakeholders is required for limiting rejection of lots and disputes in food trading

**Thank you for your attention.**