



EUROPEAN COMMISSION
HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL

Directorate D -Animal Health and Welfare
D4 – International questions (bilateral)
Head of Unit

Brussels,
SANCO D4/RL/mh (2010) 926073

Dear Mr Lin Wei,

Subject: Import of aquaculture products from China into the EU

According to Commission Decision 2002/994/EC, as amended, China is requested to provide pre-export testing guarantees that Chinese products are compliant for chloramphenicol, nitrofurantoin and its metabolites and malachite green and crystal violet and their metabolites.

We were informed by EU Member States about difficulties in interpreting the analytical results concerning crystal violet certified by China. The certificates do not clearly indicate whether these analytical results comply with Commission Decision 2002/657/EC.

Article 6 of Decision 2002/657/EC reads: "The results of an analysis shall be considered non-compliant if the decision limit (CC-alpha) of the confirmatory method for the analyte is exceeded".

Your authorities must specify the CC-alpha or Limit of Quantification (LOQ) for the chemical confirmatory analytical methods used by the laboratories for substances for which no EU MRL or MRPL, as defined in Commission Decision 2002/657/EC, has been set. This is the case for crystal violet (sum of crystal violet & leuco crystal violet).

It is suggested to use the following wording on the laboratory report forms for such substances (e.g. for crystal violet):

Substance: Crystal violet (sum of crystal violet & leuco crystal violet)

MRL/MRPL/RPA: Not set

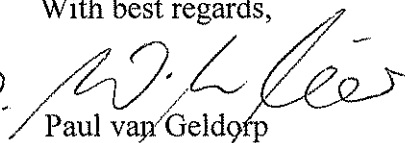
CC-alpha (or LOQ): XX ppb

Laboratory result: **either: <CC-alpha (< LOQ) or, if greater than CC alpha or the LOQ: an actual, measured, confirmed concentration.**

Mr Lin Wei
Deputy Director General
Import and Export Food Safety Bureau
General Administration of Quality Supervision, Inspection and Quarantine (AQSIQ)
The People's Republic of China

Consignments accompanied by a laboratory certificate in which CC-alpha has NOT been specified for crystal violet (in the absence of which it is not possible to judge whether any declared concentration for crystal violet on the laboratory certificate is compliant or not), have, in accordance with the provisions of Commission Decision 2008/630, to undergo all appropriate checks on arrival at the border to determine that crystal violet is not present.

With best regards,

P.O. 
Paul van Geldorp

C.c.: Chinese mission to the European Union