

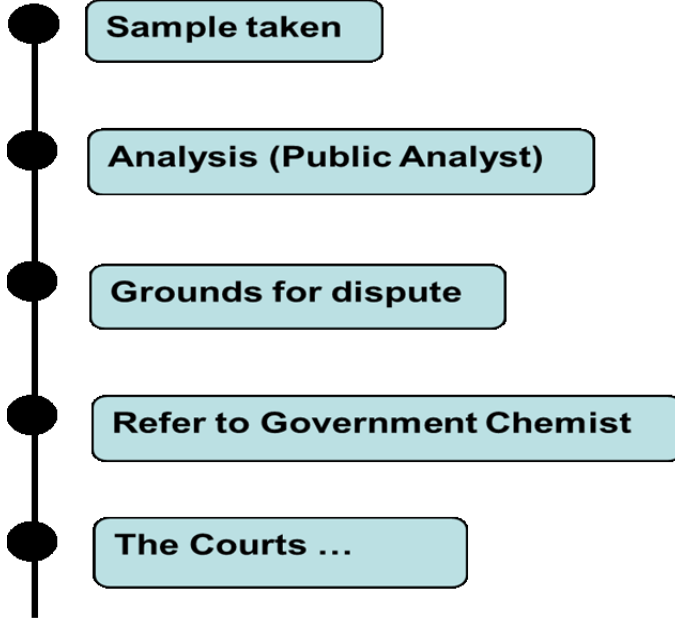


Why do labs get it wrong? Lessons from Referee Cases

Michael Walker

24 June 2020

Government Chemist acts ...



- As an **independent referee analyst**, resolving disputes that occur in relation to certain legislation
- As an **advisor** to the public sector and the wider analytical community, where there are measurement science implications of existing and proposed legislation and regulation

Typical steps in a referee case...



- **Sample receipt**

1. Accept referral?
2. Funding
3. Schedule work
4. Check legislation
5. Identify method



Typical steps in a referee case...



- **Sample analysis**

6. Investigate method
7. **Replicates 3 x 3**
8. CRMs, RMs spikes
9. **Witnessed**
10. Orthogonal **confirmation** if possible ...
11. Minuted meetings

Typical steps in a referee case...



- **Data analysis**

12. Transcriptions checked

13. Results reviewed

14. New analytical runs if required

15. **Statisticians** review dataset



Typical steps in a referee case...



Department for Business, Energy & Industrial Strategy

Laboratory of the Government Chemist
Food Safety Act 1990 Regulation (EU) 2017/625

Certificate of Analysis

To:

Summary

A summary opinion is provided to assist the reader however the whole certificate must be read.

I am of the opinion that Referee Sample 1350771, labelled as Amoy Rice Noodles taken from container [REDACTED] is a product to which Commission Implementing Decision 2011/554/EU on emergency measures regarding unauthorized genetically modified rice in rice products originating from China, as amended, applies. For the reasons stated below (sections 5 and 6) informed by official guidance the results of analysis demonstrate there was no evidence of the stipulated genetically modified elements in any of the multiple replicates of the analytical samples of the referee sample confirming Referee Sample 1350771 can be considered compliant with UK and European Union law in the context of the above regulations.

(1) I, the undersigned Michael John Walker, being a statutorily qualified Food Analyst pursuant to the provisions of the Food Safety (Sampling and Qualifications) (England) Regulations 2011 and appointed by the Government Chemist to issue this certificate hereby certify that on the 19th day of September 2019 a referee sample described as 'Amoy Rice Noodles' was received at the Laboratory of the Government Chemist (LGC) by way of Postbromer Executive Taxis from Liberty Part Health Authority. The referee sample was contained within a clear, heat-seal plastic bag, which was sealed with a blue plastic pull-through device labelled 'Liberty PPEA GBLTVU 040614'. Attached to the bag was a white paper label, digital photographs of which were taken, transferred to an electronic storage system and reproduced (Figure 1) in this certificate unaltered except for sizing to be accommodated on the page and cropping of irrelevant detail and on which was information pertaining to the sample.

Our Ref: CP-19000206-1350771, ESF-19-1-30 Your Ref: Container number SUDU6170913
Page 1 of 9

Laboratory of the Government Chemist, Queens Road, TWickenhampton, Malvern, WR11 1LZ

• Reporting

15. Certificate drafted

16. Reviewed

17. Data independently checked

18. Peer review

19. Certificate issued to all parties



LABORATORY OF THE GOVERNMENT CHEMIST
QUEENS ROAD, TWICKENHAMPTON, MALVERN, WR11 1LZ

0169 2500000 | 0169 2500001 | 0169 2500002

Laboratories reporting results of food analysis sometimes give the wrong results or the wrong interpretation – why?



Why do laboratories get it wrong?



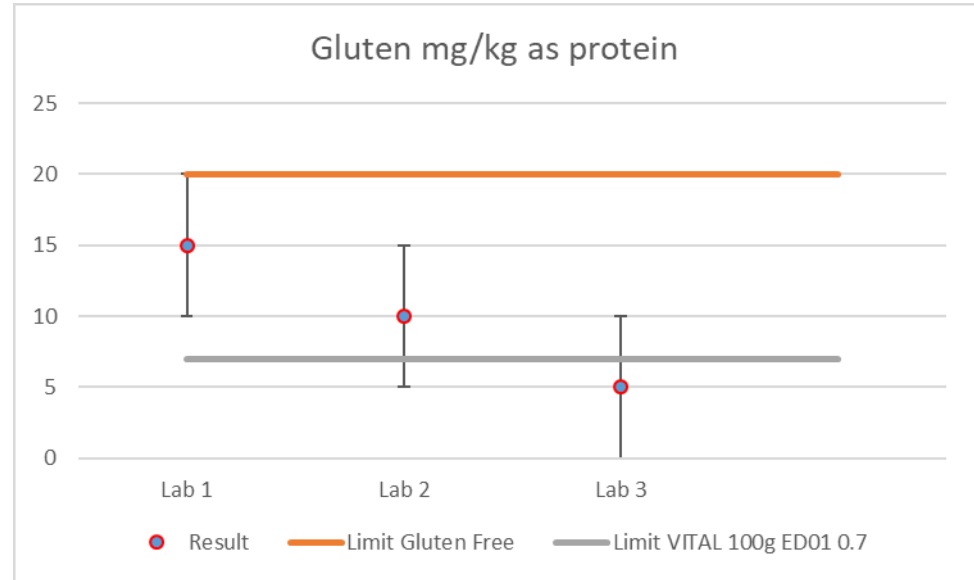
1. Inadequate planning for sampling
2. Incorrect sampling
3. Loss of chain of custody of sample
4. Inadequate method of analysis
5. Inadequate application of a method of analysis
6. Inadequate interpretation or reporting
7. Nature springs a surprise
8. Inadequate bioinformatics



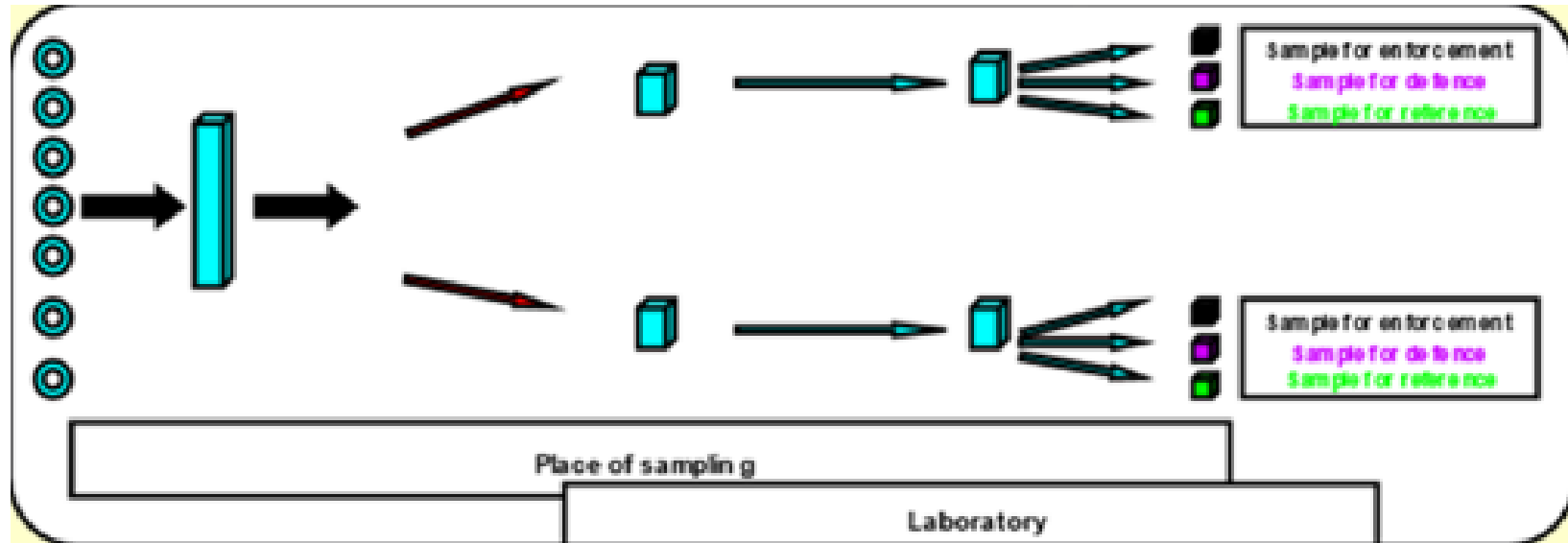
1. Inadequate planning for sampling - e.g. planned sampling for food hypersensitivity ...



- Is the survey aimed to assess
- (a) a gluten free meal for a person with coeliac condition? or
 - (b) a wheat-free meal for a person with wheat allergy? or
 - (c) both?



2. Sampling

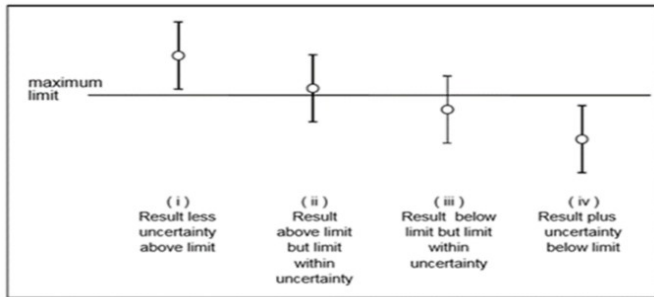


3. Walker, Colwell, Cowen, Ellison, Gray, Elahi *et al.*, 2017, Aflatoxins in Groundnuts – Assessment of the Effectiveness of EU Sampling and UK Enforcement Sample Preparation Procedures, *J Assoc Public Analysts*, 45, 1 – 22



5. Inadequate application of a method

6. Inadequate interpretation



$$R = (m_{total} - m_{native}) / m_{spike}$$

3. Walker, Colwell, Cowen, Ellison, Gray, Elahi *et al.*, 2017, Aflatoxins in Groundnuts – Assessment of the Effectiveness of EU Sampling and UK Enforcement Sample Preparation Procedures, *J Assoc Public Analysts*, 45, 1 – 22





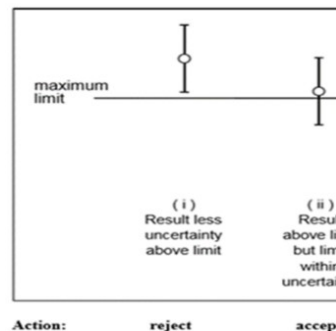
Sample taken in country of export compliant

- Sampling?
- Mould proliferation in transit?

Or ... (+ UK)

Lab forgets about

- Nut to shell ratio,
- Slurry ratio,
- Recovery correction,
- Measurement uncertainty ... or
- All of the above?



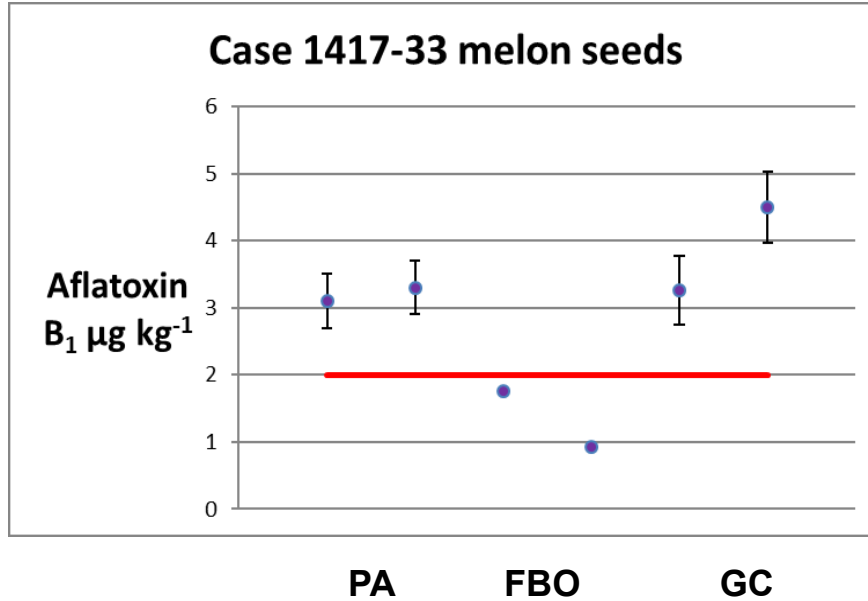
3. Walker, Colwell, Cowen, Ellison, Gray, Elahi *et al.*, 2017, Aflatoxins in Groundnuts – Assessment of the Effectiveness of EU Sampling and UK Enforcement Sample Preparation Procedures, *J Assoc Public Analysts*, 45, 1 – 22



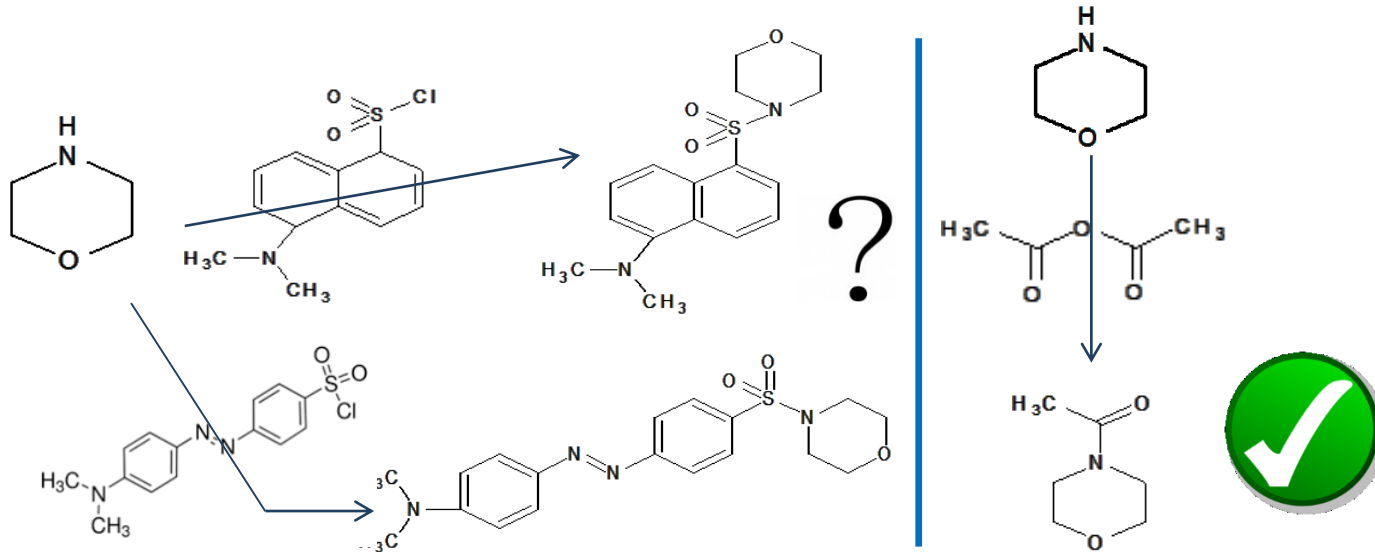
Association of Public Analysts
The Analysts' Institute
100, Victoria Road, London W12 0RS
Tel: 020 8996 9000
www.ipa.org.uk

Melon seeds – “Agushi”

One case – 2 samples



4. Inadequate method of analysis - e.g. morpholine in apples



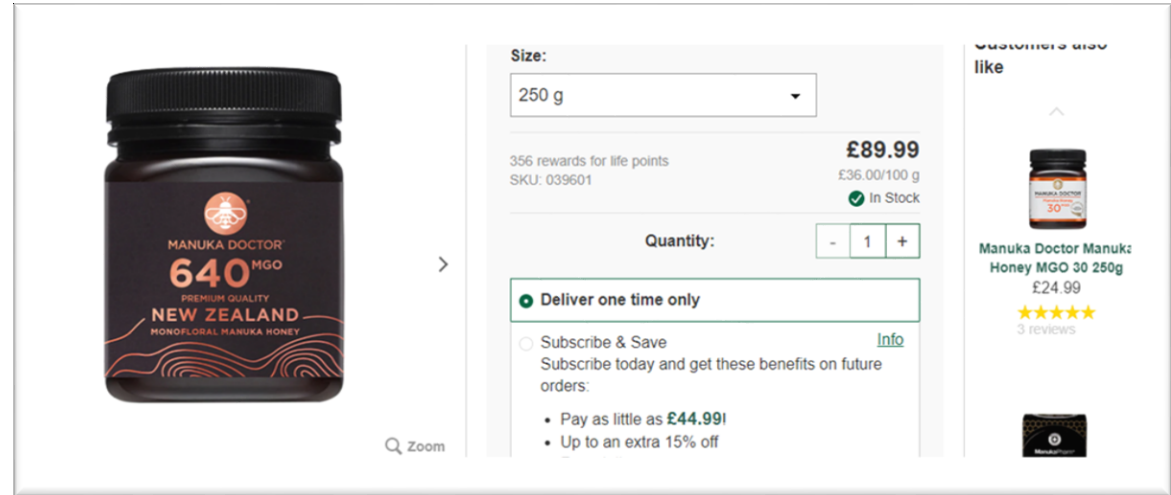
Michael J. Walker, Kirstin Gray, Christopher Hopley, David Bell, Peter Colwell, Peter Maynard and Duncan Thorburn Burns, 2011, Forensically Robust Detection of the Presence of Morpholine in Apples—Proof of Principle, *Food Analytical Methods*, 5(4), 874 - 880



7. Nature springs a surprise



- 7.1 SEM
- 7.2 Almond/mahaleb
- 7.3. Mānuka honey
SCIRMS



Random example – not case related...

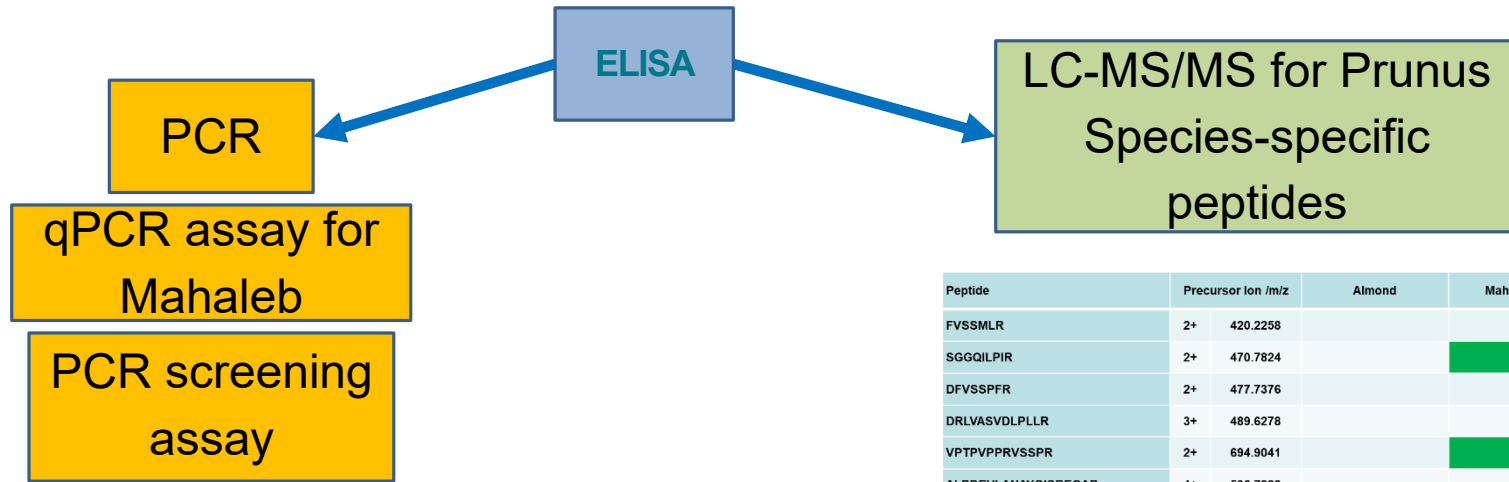
7.1 Semicarbazide (SEM)



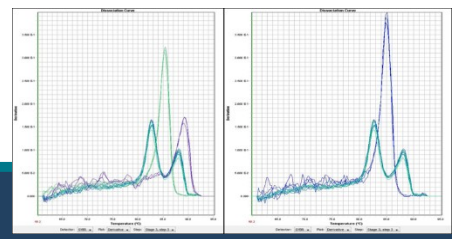
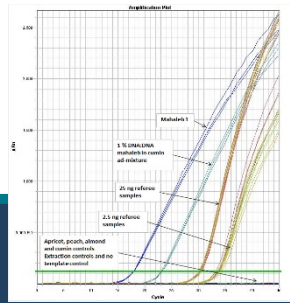
Parent drug	Marker metabolite	Abbreviation
Furazolidone	3-amino-oxazolidinone	AOZ
Furaltadone	3-amino-5-morpholinomethyl-1,3-oxazolidinone	AMAZ
Nitrofurantoin	1-aminohydantoin	AHD
Nitrofurazone	Semicarbazide	SEM

John Points, D. Thorburn Burns, Michael J. Walker, 2014, Forensic issues in the analysis of trace nitrofurantoin veterinary residues in food of animal origin, Food Control, 50, 92-103

7.2 Almond or mahaleb – cumin & paprika recalls



Peptide	Precursor Ion /m/z	Almond	Mahaleb
FVSSMLR	2+ 420.2258		
SGGQILPIR	2+ 470.7824		
DFVSSPFR	2+ 477.7376		
DRLVASVDLPLLR	3+ 489.6278		
VPTVPVPRVSSPR	2+ 694.9041		
ALPDEVLANAYQISREQAR	4+ 536.7828		
ALPDEVLANAYQISR	2+ 830.4387		
VQGQDFVSPFRS	2+ 740.3832		
TEENAFINTLAGR	2+ 718.3624		
ISTLNSHNLPILR	3+ 493.2877		
GNLDFVQPPR	2+ 571.8013		
GVLGAVFSGCPETFEESSQSSQQGR	3+ 895.7452		



7.2 Almond or mahaleb related publications



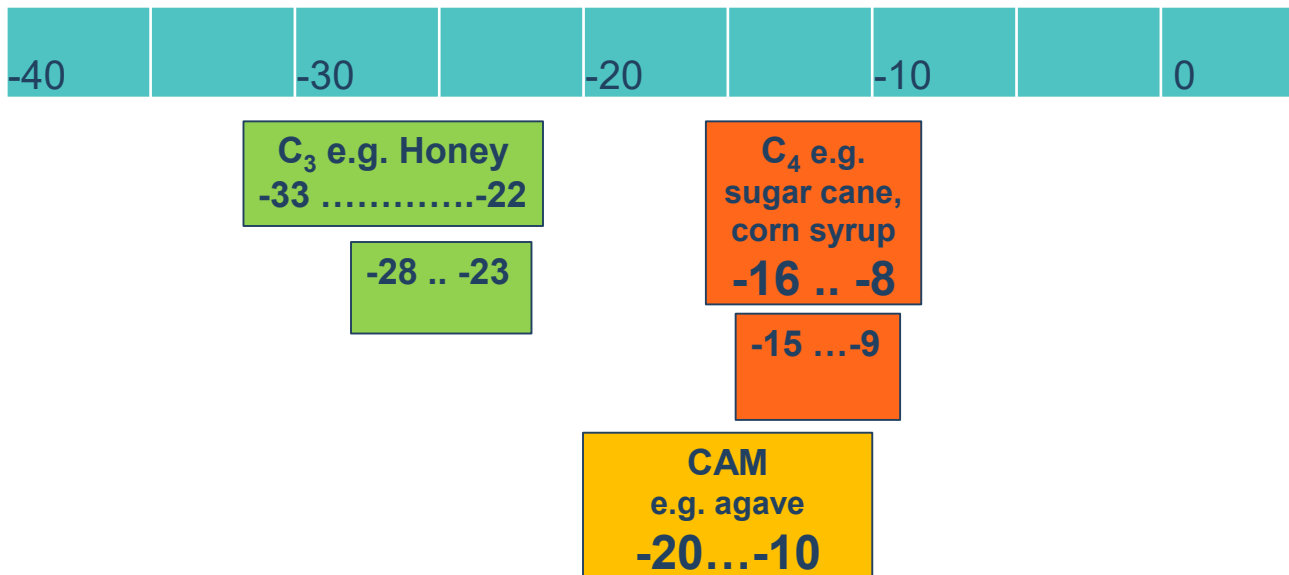
1. Burns, M., Walker, M., Wilkes, T., Hall, L., Gray, K. and Nixon, G. (2016) Development of a Real-Time PCR Approach for the Specific Detection of *Prunus mahaleb*. *Food and Nutrition Sciences*, 7, 703-710.
2. Nixon, G., Hall, L., Wilkes, T., Walker, M. and Burns, M. (2016) Novel Approach to the Rapid Differentiation of Common *Prunus* Allergen Species by PCR Product Melt Analysis. *Food and Nutrition Sciences*, 7, 920-926.
3. Walker, M.J., Burns, M., Quaglia, M., Nixon, G., Hopley, C.J., Gray, K.M., Moore, V., Singh, M. and Cowen, S., (2017), Almond or Mahaleb? Orthogonal Allergen Analysis During a Live Incident Investigation by ELISA, Molecular Biology, and Protein Mass Spectrometry. *Journal of AOAC International* ,101, 162 – 169
4. Inman, S.E., Groves, K., McCullough, B., Quaglia, M. and Hopley, C., 2018. Development of a LC-MS method for the discrimination between trace level *Prunus* contaminants of spices. *Food chemistry*, 245, pp.289-296.
5. Michael Walker and Malcolm Burns, The Almond and Mahaleb Allergen Story – PCR Resolution of Live Incident Investigations, in: *DNA Techniques to Verify Food Authenticity: Applications in Food Fraud*, Eds. by Malcolm Burns, Lucy Foster, Michael Walker, Royal Society of Chemistry, London 2019, ISBN 978-1-78801-178-5, pp 154 -161





7.3 Mānuka honey – added sugars $\delta^{13}\text{C}$ ‰

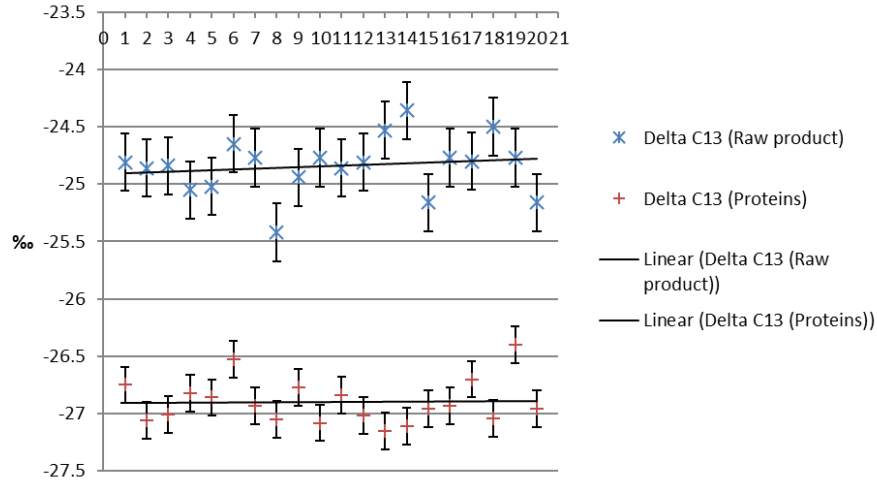
$$\delta^{13}\text{C}_{\text{CHO}} \sim \delta^{13}\text{C}_{\text{protein}}$$



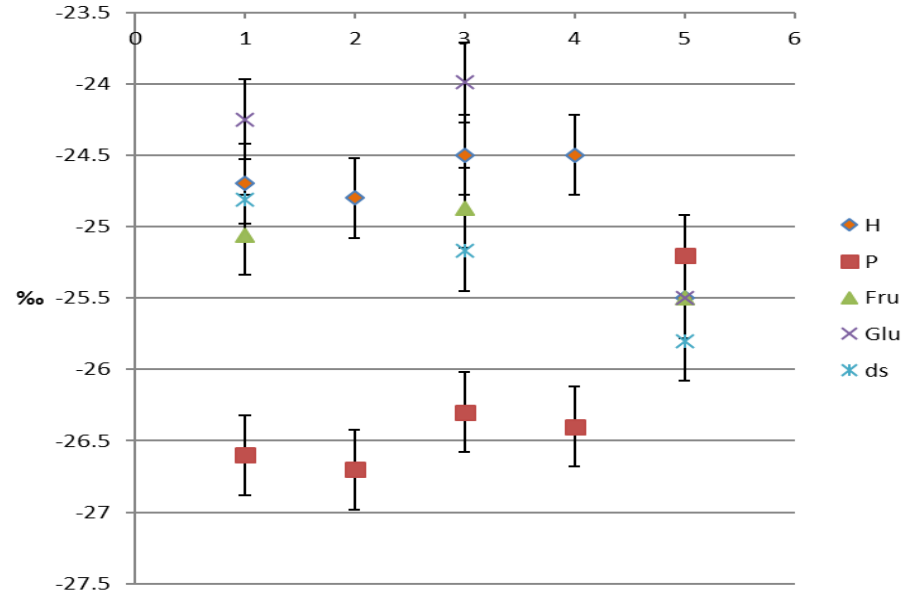
7.3 Mānuka honey – added sugars



AOAC $\delta^{13}\text{C}$ ‰ data



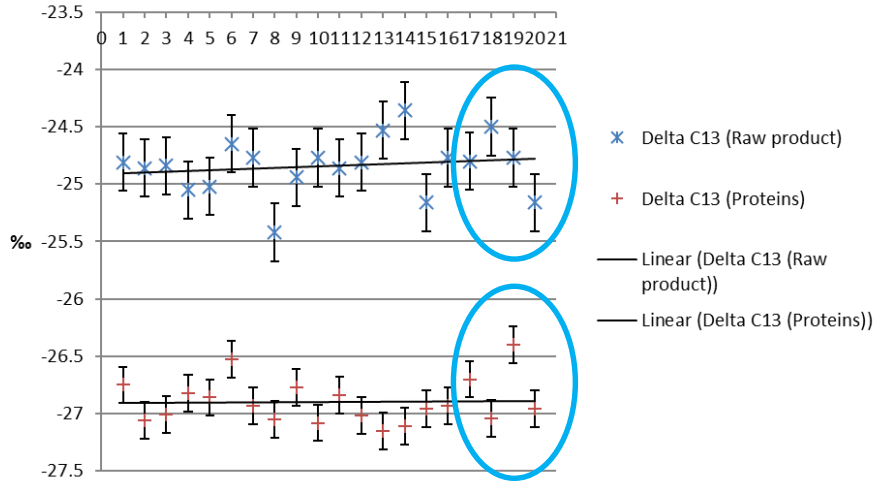
$\delta^{13}\text{C}$ data



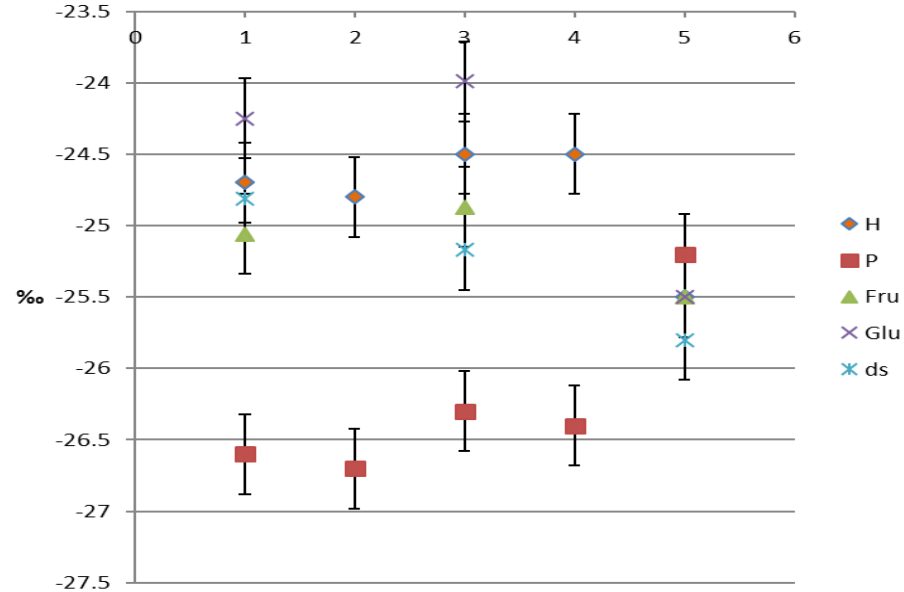
7.3 Mānuka honey – added sugars



AOAC $\delta^{13}\text{C}$ ‰ data



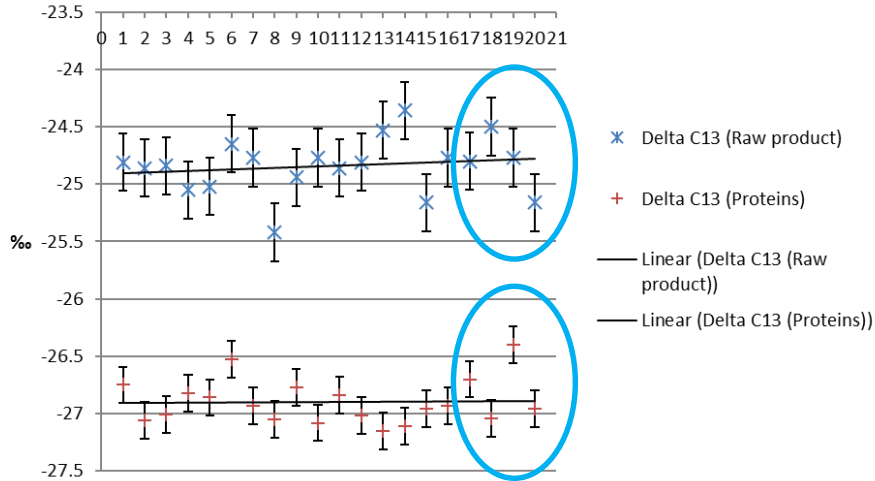
$\delta^{13}\text{C}$ data



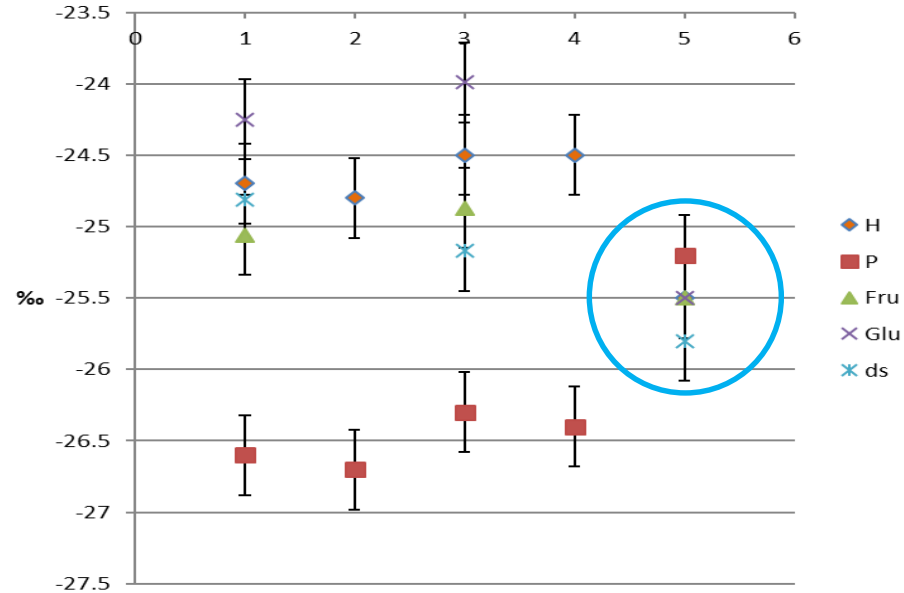
7.3 Mānuka honey – added sugars



AOAC $\delta^{13}\text{C}$ ‰ data



$\delta^{13}\text{C}$ data



See also ...



ELSEVIER

Contents lists available at [ScienceDirect](#)

Science & Justice

journal homepage: www.elsevier.com/locate/scijus



Rogers *et al.*, 2014. Investigating C-4 sugar contamination of manuka honey and other New Zealand honey varieties using carbon isotopes. *J. agric food chem*, 62, 2605-2614.

Rogers *et al.*, 2014. The unique manuka effect: why New Zealand manuka honey fails the AOAC 998.12 C-4 sugar method. *J agric food chemistry*, 62, 2615-2622.

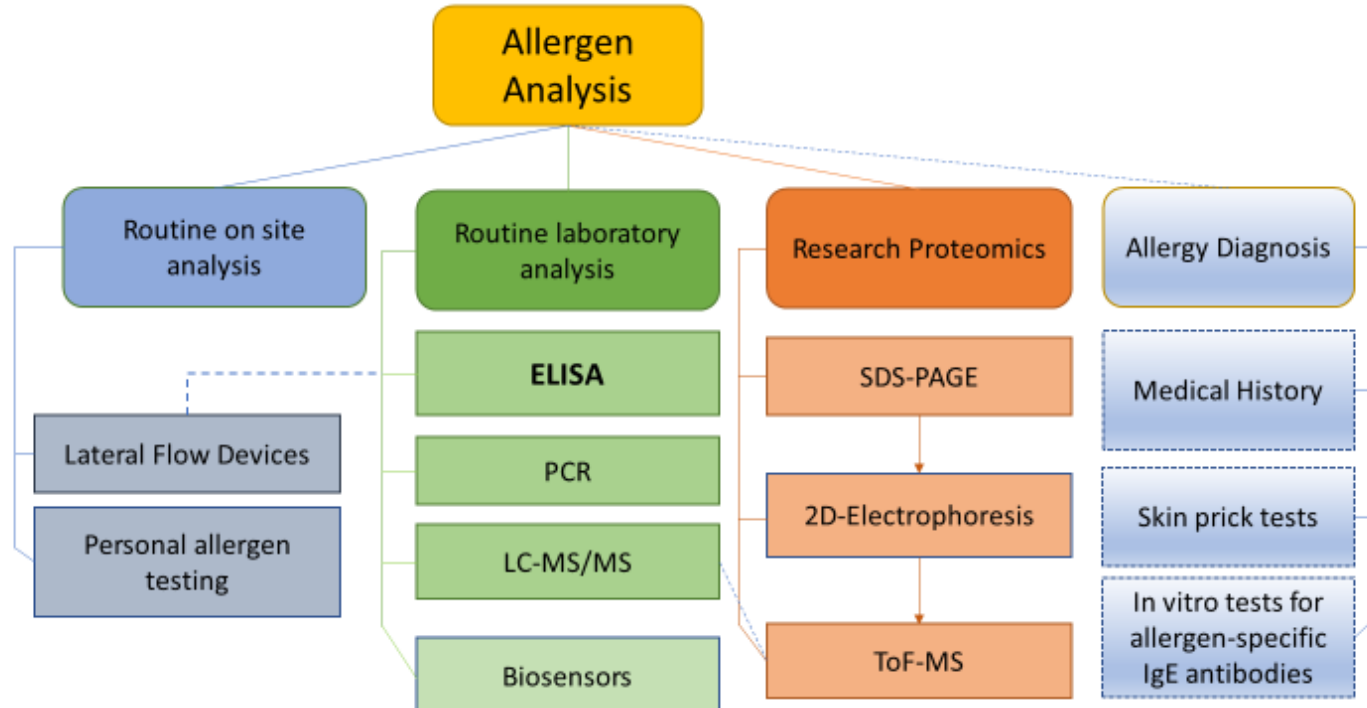
Lessons learned from inter-laboratory studies of carbon isotope analysis of honey

Philip J.H. Dunn^{a,*}, Sarah Hill^a, Simon Cowen^a, Heidi Goenaga-Infante^a, Mike Sargent^a, Ahmet Ceyhan Gören^{b,1}, Mine Bilsel^b, Adnan Şimşek^b, Nives Ogrinc^c, Doris Potočnik^c, Paul Armishaw^d, Lu Hai^e, Leonid Konopelko^f, Yan Chubchenko^f, Lesley A. Chesson^g, Gerard van der Peijl^h, Cornelia Blaga^h, Robert Poseyⁱ, Federica Camin^j, Anatoly Chernyshev^k, Sadia A. Chowdhury^l



Journal Pre-proof

Food allergen analysis



Walker, M.J., 2019. Food Allergens: An Update on Analytical Methods. In: Melton, L., Shahidi, F., Varelis, P. (Eds.), Encyclopedia of Food Chemistry, vol. 1, pp. 622–639. Elsevier.,



Food allergen analysis (4) (6)



- Remains problematic but much good work is underway
- In critical situations >1 approach if possible
 - e.g. at least 2 ELISA platforms, or ≥ 2 of ELISA, PCR, LC-MS/MS
- RMs (LGC & MoniQA) – how best to use them!
- When analytical targets differ RMs may not help much
- Bioinformatics of plant allergens still need work
- Reporting - sufficient detail to assist risk assessors and managers
- Upper rather than the lower bound of the MU as datum of interest

Walker, M.J., Burns, D.T., Elliott, C.T., Gowland, M.H. and Mills, E.C., (2016), Is food allergen analysis flawed? Health and supply chain risks and a proposed framework to address urgent analytical needs. *Analyst*, 141(1), pp.24-35



Reporting the results of allergen analysis



- Method of analysis – ELISA, PCR or LC-MS/MS
- [X] mg/kg as Y,
 - where [X] is the best estimate of the concentration of allergen found by analysis of the sample received after in-laboratory homogenisation, extraction and analysis by a validated method, and
 - Y is EITHER the allergen protein OR the name of the food.
- But if the whole food is the reporting basis the conversion factor from allergen protein to whole food must be given.
- Conversion factors should be agreed with literature references to the typical protein contents of (at least) Annex II allergens. Adding the N to protein factor would be useful.

As a matter of routine the basis of data as allergen or (preferably) allergen protein should be specified every time a datum is given in a method or report.



Allergen QRA webinar



Introduction to the New ILSI Europe Activity on Food Allergen Quantitative Risk Assessment

<https://register.gotowebinar.com/register/4360356758752960014>

29th June 2020
15 30 – 16 30
UK time

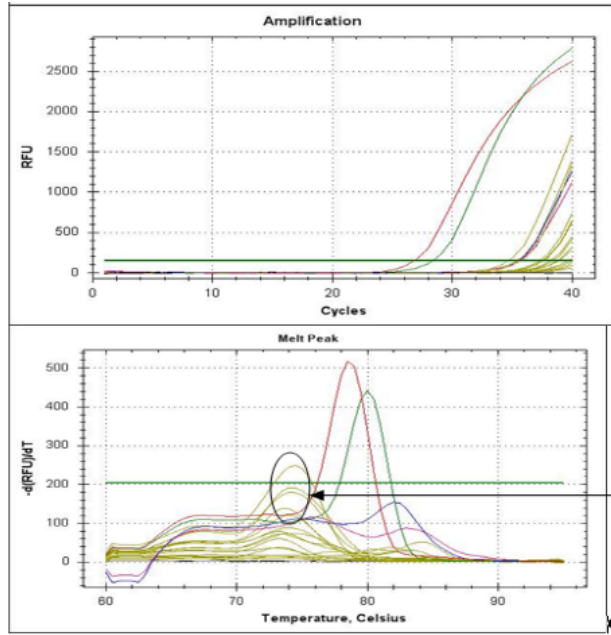


Introduction to the project, providing insight on the aim, importance and outcome of the activity, as well as practical information such as timeline, followed by a short Q&A session.



European Commission
Directorate-General for Health and Food Safety
Unit for Food Safety and Food Quality

5. GMO detection - rice



DNA sequences -

- P35S
- TNOS
- CryIAb/CryIAc
- Rice taxon-specific method, e.g. PLD
- SYBR® green assay for Cry1Ab/Ac required



8. Inadequate bioinformatics



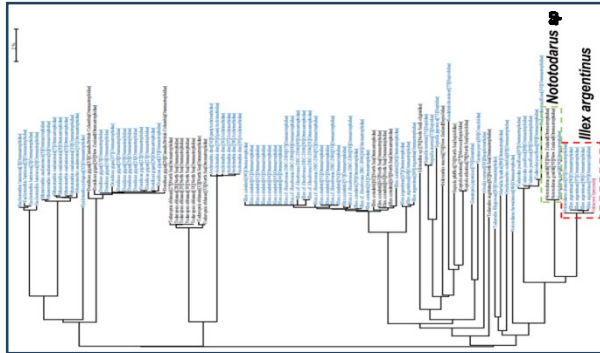
Back label “squid” “Produced in New Zealand and packed in the UK from arrow squid caught in the South West Pacific Ocean ...”

Public Analyst “DNA consistent with that of *Illex argentines*”

Arrow squid - *Nototodarus gouldi* and *Nototodarus sloani*



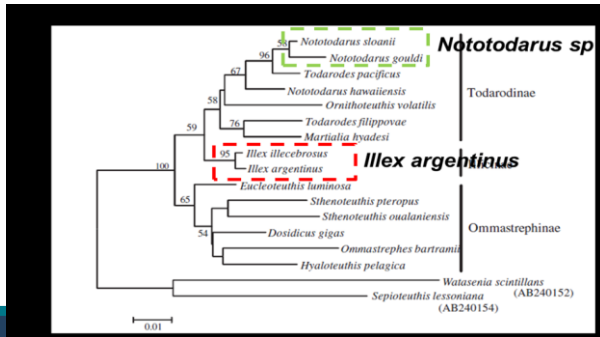
Differentiation by COI gene data available in 'BOLD' and 16s rRNA sequence in GenBank



BOLD: Illex and Nototodarus most probable species, > 99% similarity with target sequence



NCBI: Illex and Nototodarus species shared joint top most probable species identity, 89 % - 94 % sequence similarity with the referee sample sequence

Public Analyst and FBO labs justified in their differing reported findings




Choking hazards (5), (6)



 **Joe Whitworth** • 1st
Journalist with a focus on food safety and food fraud
20h • 

A not so sweet treat



Gel cups recalled from 25 countries because of choking risk

Analytical Strategy for the Evaluation of a Specific Food Choking Risk, a Case Study on Jelly Mini-Cups

[Michael J. Walker](#)  [Peter Colwell](#), [Derek Craston](#), [Ian P. Axford](#) & [Jack Crane](#)

Food Analytical Methods **5**, 54–61(2012) | [Cite this article](#)



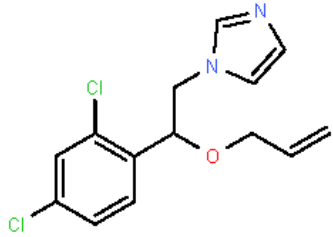
<https://www.gov.uk/government/news/successful-workshop-on-assessment-of-jelly-mini-cups>

https://www.linkedin.com/posts/joe-whitworth-30b6b052_gel-cups-recalled-from-25-countries-because-activity-6679719487895298048-YkHr



U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

Pesticides – Imazalil (4), (7)



297 → 159 *m/z*

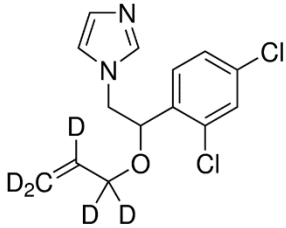
297 → 201 *m/z*

297 → 255 *m/z*

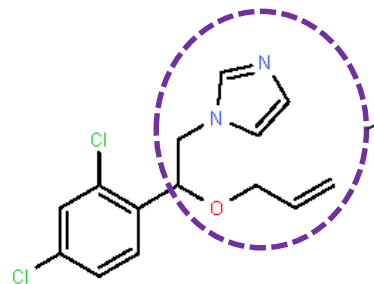
297 → 176 *m/z*

297 → 173 *m/z*

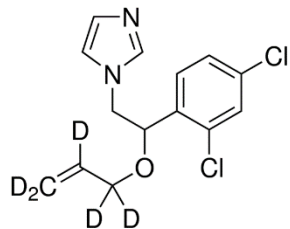
297 → 109 *m/z*



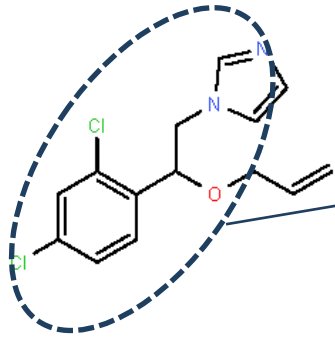
Pesticides - Imazalil



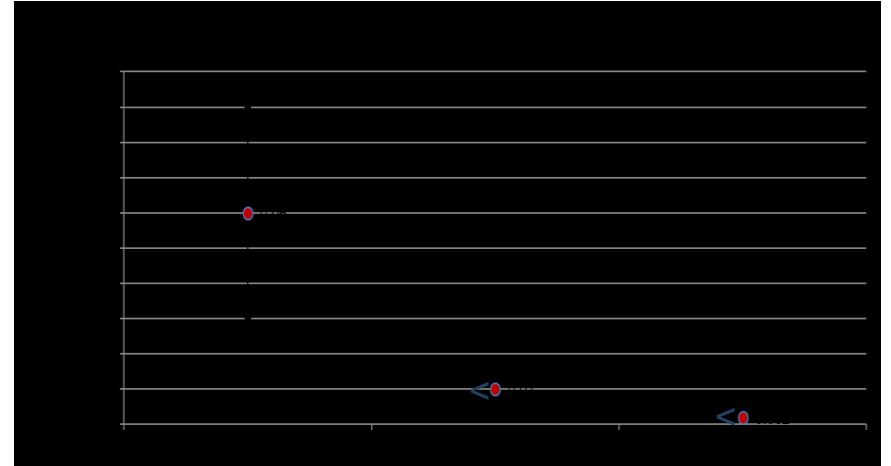
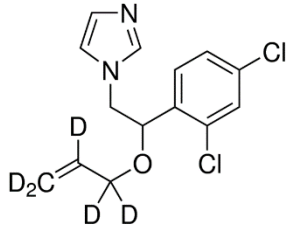
- 297 → 159 *m/z*
- 297 → 201 *m/z*
- 297 → 255 *m/z*
- 297 → 176 *m/z*
- 297 → 173 *m/z*
- 297 → 109 *m/z*



Pesticides - Imazalil



- 297 → 159 *m/z*
- 297 → 201 *m/z*
- 297 → 255 *m/z*
- 297 → 176 *m/z*
- 297 → 173 *m/z*
- 297 → 109 *m/z*



A good laboratory



- ✓ The necessary expertise, equipment and infrastructure
- ✓ Sufficient suitably qualified, trained and experienced staff
- ✓ Performs impartially free from any conflict of interest
- ✓ Delivers in a timely manner, and
- ✓ Accredited and operates to EN ISO/IEC 17025

Anything else?



- ✓ The necessary expertise, equipment and infrastructure
- ✓ Sufficient suitably qualified, trained and experienced staff
- ✓ Performs impartially free from any conflict of interest
- ✓ Delivers in a timely manner, and
- ✓ Accredited and operates to EN ISO/IEC 17025

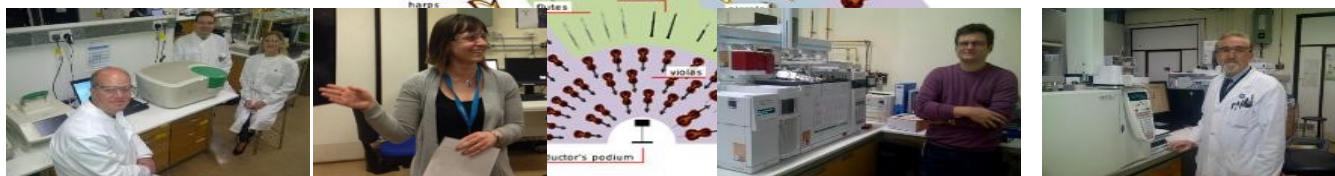
Understands the context

- ✓ **Scientific**
- ✓ **Legislative**
- ✓ **Policy**

Why do laboratories get it wrong?



1. Inadequate planning for sampling - allergens
2. Incorrect sampling - mycotoxins
3. Loss of chain of custody of sample
4. Inadequate method of analysis – morpholine, GMOs, allergens
5. Inadequate application of a method of analysis – choking hazards
6. Inadequate interpretation or reporting – mycotoxins, allergens
7. Nature springs a surprise – SEM, mahaleb, manuka honey SCIRMS
8. Inadequate bioinformatics – squid (but also plant allergens ...)



woodwind family

violin family



Acknowledgements

Ian Axford
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Stephen Nyangoma
Phillip Wilson
Milena Quaglia
Chris Hopley
Kate Groves
Bryan McCullough
Sophie Inman
Luis Ruano Miguel
Emily Whyte
Tabatha Hambridge
Giles Drinkwater
Elena Sanchez
Vicki Barwick

Gill Holcombe and team
UoM:

Clare Mills
Chiara Nitride
Victoria Lee,
Anuradha Balasundaram
Bushra Javed

Romer Labs:
Adrian Rogers & colleagues

QUB:
Chris Elliott
Duncan Thorburn Burns
Katrina Campbell



Department for
Business, Energy
& Industrial Strategy

FUNDED BY BEIS



Department
for Environment
& Rural Affairs

