

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

MAS-CRD/13
ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON METHODS OF ANALYSIS SAMPLING

Comments of EU, Thailand

European Union

The European Union and its Member States (EUMS) welcome the great effort of Germany to provide the technical background necessary for the estimation of measurement uncertainty and the examples for illustrating different use cases; it will certainly support the guidance provided by CXG 54. The content of the information document explains in a comprehensive manner the main approaches to estimate measurement uncertainty, the models and assumptions governing those approaches and provides practical examples. It could profit from better addressing specific needs of Codex members, who mostly deal with test methods validated by collaborative study. Method performance data resulting from collaborative studies do in a number of cases not include certain uncertainty sources e.g. preparation steps related to transforming a laboratory sample into the test portion by grinding, mixing, sieving, etc. This aspect was one of the original triggers for revising the current CXG 54 and an illustrative example could be a valuable addition to the information document.

Thailand

General comments

1. We have no objection on advancing the Draft Information Document on Procedures for the Estimation of Measurement Uncertainty (Appendix I) to the 44th session of CAC for consideration.
2. We agree to publish the information document on the Codex website.

Specific comments

• **Section 1. Introduction**

Recognizing that CXG54 covers the measurement uncertainty, excluding the sampling uncertainty. So, in this connection, the scope of this information document should not cover the sampling uncertainty and any explanations related to the sampling uncertainty should be excluded from the whole document.

• **Section 6 Empirical versus rational methods**

This section describes that in the Codex system, empirical methods include Type I methods, meanwhile rational methods include Type II-IV methods. However, in our opinions, some empirical methods could be endorsed as Type IV, since their validation data are not complete to be endorsed as Type I methods.

So, we would like to propose to amend the first bullet to read:

“• Empirical method (type I methods and some of type IV methods which are empirical methods in the CODEX system)”