

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

CX/MAS 23/42/8 Add.1

ORIGINAL LANGUAGE ONLY

June 2023

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

42nd Session
Budapest, Hungary
13 – 16 June 2023 with report adoption on 20 June 2023 (virtual)

REVISION OF *THE GENERAL GUIDELINES ON SAMPLING* (CXG 50 – 2004)

Comments in reply to CL 2023/15/OCS-MAS

Comments of Australia, Brazil, Ecuador, Egypt, European Union, Iraq, Japan, Mauritius, Philippines, Uganda

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/15/OCS-MAS issued in March 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and presented in table format.

Annex I

GENERAL COMMENTS	
<p>Ecuador agradece al grupo de trabajo la revisión del documento CX 50 (apéndice I).</p> <p>Ecuador está de acuerdo con los cambios realizados al documento, el cual se encuentra mejor estructurado, y apoya que se continúe con el grupo de trabajo para el desarrollo del documento de información.</p>	Ecuador
<p>Brazil appreciates the excellent work made by New Zealand and Germany to provide a comprehensive and complex document on sampling and thanks for the opportunity to present the following comments.</p> <p>Regarding the structure of the document, we suggest organizing it into chapters according to the nature and rationale behind each of the sampling plan and in line with the examples described in the information document, to facilitate the reading and understanding of the content. The scope of each sampling plan should be clear as to the applicable situations.</p> <p>Furthermore, we have noticed that questions raised by the EWG in 2019 are not completely answered in an objective and practical way in the revised guidelines. These questions are described in the presentation to CCMAS40 (https://www.fao.org/fao-who-codexalimentarius/sh-proxy/pt/?Ink=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-715-40%252FSIDE%20EVENT%252FCCMAS40_GL50.pdf) and copied below:</p> <p>“The EWG comments over both documents did raise some important questions and these were covered in the CL2019/17-MAS</p> <ul style="list-style-type: none"> - In what context is it that Codex sampling plans are intended to be used? - What do Codex sampling plans hope to achieve? - How Codex sampling plans can be used by exporting and importing countries in real situations? - Are Codex sampling plans intended for use in international trade disputes? - What situations where Codex sampling plans are used, are covered or not covered?” <p>Considering these points raised and the specific comments provided, Brazil is of the opinion that the document is not ready for adoption in step 8.</p>	Brazil
<p>The European Union and its Member States (EUMS) congratulate the EWG under the lead of New Zealand and co-chaired by Germany for the further development of the revision of CXG50-2004. Sampling is an essential element for the verification of provisions in Codex standards and the revision of CXG50 with the overall aim to simplify its structure and language to provide effective guidance to all CAC subsidiary bodies and interested parties for designing/selecting sampling plans, is highly welcome. The EUMS are of the opinion that the presented draft addresses in a comprehensive manner the written comments to CL 2021/10/OCS-MAS and those made during the discussion of CCMAS41, in particular the terminology related to measurement error/measurement uncertainty, which has been aligned with JCGM, ISO and EURACHEM texts. The issues around the difference between acceptance sampling and conformity assessment were also addressed and clarified.</p> <p>Chapters 1-4 of the ‘Reference Guidelines’ provide an easy-to-read background to acceptance sampling, which will certainly be helpful for Commodity Committees to select and design relevant sampling plans for CXs within their scope. Chapter 5 is - perhaps by the nature of the subject - quite complex. As it deals primarily with the application of acceptance sampling in certain exceptional situations, it could be moved to the e-book, where more explanations could be given and illustrated through suitable examples.</p>	European Union

<p>Appendix I guides users through the work flow for the selection of sampling plans appropriate for the most common use cases of Codex Commodity Committees. The provided examples highlight the high number of samples that need to be tested if PRQ and CRQ are maintained at low levels of nonconforming items. Even if user will have the opportunity to 'experiment' with the ShinyApps in the e-book to find solutions requiring a lower number of samples, certain 'prefabricated' plans from the ISO standards should be offered for the orientation of less experienced users (e.g., by referring to the ISO plans in Annex II).</p> <p>The EUMS are aware that the proposed CXG50 text follows a different approach and style compared to the current version, which was the intent of the re-draft. Information provided as tables and figures in the current CXG50 will be moved to an e-book and will be provided in form of software apps, which is an appropriate and smart way of helping users to understand the impact of certain plans. Notwithstanding the idea of going digital, the EUMS welcome Annex II, which contains ISO plans in tabular form, but question why only plans indexed by PRQ (AQL) are included, since sampling inspection of isolated lots represent the majority of applications in the Codex context, particularly, as sampling plans indexed by CRQ (LQ) are relevant for food safety related characteristics.</p> <p>The EUMS again stresses the need for validating, debugging and beta-testing of the (Shiny)apps to ensure proper functioning of the system. Moreover, access and maintenance of the software have to be addressed as well.</p> <p>The EUMS invites the Committee to explain the relationship of the re-drafted CXG 50 and the existing Information Document 'Practical Examples of Sampling Plans' as well as sampling plans of existing Standards, e.g. those of CXS 193.</p>	
<p>Agree with no comments.</p>	<p>Iraq</p>
<p>Australia would like to thank New Zealand and Germany for their continued efforts and development of the Revised General Guidelines on Sampling (CXG 50-2004) including Appendix I (Guide to the Selection and Design of Sampling plans) and Appendix II (ISO Inspection Plans)</p> <p>Compared to the 'Revised General Guidelines on Sampling (CXG 50-2004): Part II – Reference Document' distributed to the EWG June 2022, the 'Revised General Guidelines on Sampling (CXG 50-2004) including Appendix I (Guide to the Selection and Design of Sampling plans) and Appendix II (ISO Inspection Plans) (at Step 6)' has undergone some substantial and key revisions</p> <p>We particularly support the inclusion of a discussion on ISO Sampling Plans; the distinction of Acceptance Sampling versus Conformity Assessment; the distinction between analytical measurement uncertainty and the sampling component of (the total) measurement uncertainty; and linkage of the 'Reinspection' with the 'The Guidelines for Settling Disputes on Analytical (Test) Results (CXG 70-2009), plus removal of information on 'retesting'.</p> <p>We thus believe this latest revised CXG 50 could advance to Step 8.</p>	<p>Australia</p>
<p>Egypt agrees on the proposed draft & recommends the following notes:</p> <ul style="list-style-type: none"> • Referring to examples of isolated lots, and a series of continues lots, as mentioned in the old version of CXG 50 - 2004 , as the aforementioned examples were deleted when reviewing the project, in order to facilitate the implementation. • Review table numbers mentioned in the project. • Providing the project with the item on the decision-making tree, as stated in the old version of the specification. 	<p>Egypt</p>
<p>Uganda supports the reestablishment of the EWG to complete the development of the information document (e-book and with sampling plans applications).</p>	<p>Uganda</p>

SPECIFIC COMMENTS		
1. Reference Guidelines		
1.1 Introduction		
4th para	<p>Sampling therefore plays an important role in achieving the Codex objectives of protecting consumers' health and ensuring fair practices in the food trade. Codex sampling plans also have an important role in avoiding or removing difficulties which may be created by diverging legal, administrative, and harmonizing technical approaches to sampling and by diverging interpretation of results of analysis <u>interpretation</u> in relation to lots or consignments of foods, in the light of the relevant provision(s) of the applicable Codex standard.</p> <p>We suggest redrafting the fourth paragraph as following:</p> <p>“Sampling therefore plays an important role in achieving the Codex objectives of protecting consumers' health and ensuring fair practices in the food trade. Codex sampling plans also have an important role in harmonizing technical approaches to sampling and by results of analysis interpretation in relation to lots or consignments of foods, in the light of the relevant provision(s) of the applicable Codex standard.”</p>	Brazil
5th para	It is important that sampling is-be undertaken in a way that contributes to these objectives.	Mauritius
6th para	Specification of these quality objectives, the quality level acceptable to the customer and the rate of acceptance of compliant products, enable <u>enables</u> the development of sampling plans.	
1.2 Scope		
1st para	<p>In these Guidelines, the focus is on acceptance sampling plans for the inspection of isolated homogeneous lots, in which the risks to consumers and producers are controlled. <u>Additionally, there are some guidelines for sampling inhomogeneous lots.</u></p> <p>In the first paragraph of the scope, we suggest including a sentence as read below.</p> <p>“In these Guidelines, the focus is on acceptance sampling plans for the inspection of isolated homogeneous lots, in which the risks to consumers and producers are controlled. Additionally, there are some guidelines for sampling inhomogeneous lots.”</p> <p>We also suggest moving the last paragraphs of the scope, from “the following situations are covered by these guidelines” to the “note”, which list the situations covered by the guidelines, to the introduction section. Another option would be including these situations in a table of contents.</p>	Brazil
4th para	<p>In section 2, general concepts which are relevant for the sampling of foods are defined, sections 3, 4 and 5 cover acceptance sampling plans for different situations of statistical food control. Section 6 covers other matters such as physical sampling, reinspection, and inhomogeneous lots.</p> <p>Japan proposes to delete “reinspection”. Reinspection is not a part of sampling or statistical consideration, but may be necessary when parties involving import and export enter dispute over the analytical results. Thus, it is important to avoid duplication of work and inconsistency with other Codex texts, especially CXG70.</p>	Japan

1.3 Definitions		
	<p>We note that the document contains definitions for terms throughout the text and not just in section 1.3. In this regard, we suggest including all definitions in a single section and aligning them with existing definitions in other Codex documents, to avoid inconsistencies and contradictions. Otherwise, it would be necessary to perform an extensive review in the Codex Standards. For example, in Annex 1 of CXS 193-1995 - General Standard for Contaminants and Toxins in Food and Feed, there is a table with definitions for laboratory sample and test portion which differs from the definitions included in table 3 (Bulk material terminology for sampling plans) of the revised General Guidelines on Sampling.</p> <p>The FAO Mycotoxin Sampling Tool User Guide also mention buyer's and the seller's risks with the same meaning of exporter's risk and importer's risk mentioned in CXS 193-1995. We suggest using the terms that better reflect the intention and avoid defining consumer and producer.</p> <p>There are many terms used that were not defined and should be align throughout text, such as acceptance criterion, decision criteria and decision rule.</p> <p>Brazil prefers keeping, as extend as possible, the definitions already used and understood in the Codex world or mention them in the definition section all the correspondences.</p>	Brazil
	<p>"Sampling plan", "sampling procedure" and "sampling methods" have already used in other Codex documents and important terms in relation to sampling. For consistency with other Codex texts, it is important to make sure their definitions should be consistent with those in other Codex and/or relevant international technical documents (e.g. ISO) to avoid unnecessary confusion to readers</p>	Japan .
2 Acceptance Sampling – General Principles		
2.1 Reasons for Samping		
2nd para	<p>Acceptance sampling procedures are used when goods are transferred between two parties. The purpose of these procedures is to provide unambiguous rules for releasing a product after inspection of only a limited sample. Both parties should be fully aware of the limitations and risks associated with using such procedures and therefore most acceptance sampling procedures should include provisions for dealing with disputes and non-conforming items found in lots that have been accepted by the sampling plan.</p> <p>"Sampling" in this text conflicts with "sampling" defined in Section 2. In addition, since Codex has already developed guidelines related to trade dispute caused by analytical results (CXG 70), it is not necessary to refer to "trade dispute" in this guideline, considering trade dispute related to analytical value may be caused not only by sampling procedure but also by other factors. We propose to delete texts after "and therefore most...".</p>	Japan
3rd para	<p>An acceptance sampling plan specifies the number of samples to be taken and how they are to be taken, the procedure used to test or examine those samples, and the acceptance criterion, based on the results from the testing of those samples, used to decide whether a lot should be accepted.</p> <p>In this text, methods of analysis should be selected based on sampling plans, which is not the current practice of endorsement in CCMAS. To change the procedure, discussion at the CCMAS plenary is necessary. Japan would like to flag up the point to other delegations.</p>	

2.2 Approaches to Acceptance Sampling		
7th para	<p>Approach (c) is not recommended. It may be used for practical reasons, such as limited resources, or for simplicity. However, such plans might not provide the expected level of assurance of food quality and may inadvertently impose high costs, for instance through unwarranted acceptance of food that could lead to illness or unjustified rejection that, in turn, could lead to the imposition of fines, penalties or trade sanctions. The risks associated with such plans should be evaluated where possible. Decisions on acceptance or rejection should not be made solely based on these plans except by mutual agreement of the consumer and producer with an understanding of the risks involved.</p> <p>These guidelines are to be established to help governments and commodity committees elaborating feasible, suitable sampling plan. As it is necessary under a certain situation to accomplish the Codex's objectives, "not recommend" an option is not suitable. Propose to delete "is not recommended. It"</p>	Japan
Acceptance sampling versus conformity assessment		
Section number (2.2.1) should be included for easier reference		Japan
1st para	<p>Acceptance sampling and conformity assessment do not have the same purpose. Conformity assessment is the use of a single measurement result to decide whether a single item conforms to a limit. Acceptance sampling is the process in which a sample² is taken from a lot and involves the determination of acceptance criteria and sample size to decide whether a lot is accepted or rejected.</p> <p>"Conformity assessment" is not defined in the definition section. For better understanding by readers, the definition should be included in the definition section, so that users can understand the content better.</p>	
Conformity assessment		
<p>The document should make it clear when uncertainty should apply and whether it will apply in choosing the plan or affect the decision rule.</p> <p>We also note that the information document mentions sample preparation, sampling and analytical variance, however, variance is not addressed in the guidelines, i.e. how it will be applied to design a sampling plan.</p>		Brazil
Propose to add section number (2.2.2)		Japan
<p>In conformity assessment, conformity is assessed via the application of a decision rule which accounts for measurement uncertainty. Depending on the measurand, the measurement Measurement uncertainty may or may do not include uncertainty from sampling; however, total MU, including uncertainty from sampling, would be of important. Depending on the decision rule, there may be cases where the assessment is inconclusive.</p> <p>This text conflicts with the definition of Measurement Uncertainty in CXG-54, in which measurement uncertainty does not include uncertainty from sampling.</p> <p>The text should read as follows: Measurement uncertainty do not include uncertainty from sampling; however, total MU, including uncertainty from sampling, would be of important.</p>		Japan
Acceptance sampling		
Section number 2.2.3 should be included.		Japan

2nd para	<p>In the case that the quality level is expressed in terms of the percentage of nonconforming items, the distinction between acceptance sampling and conformity assessment is quite clear; the measurand is defined for the individual items, and thus the question of conformity to a specified requirement can only be framed in relation to the individual items. However, lot acceptance or rejection is not decided on the basis of the compliance or non-compliance of an individual item; instead, the acceptance criterion is expressed in terms of the percentage of nonconforming items, i.e., in terms of the distribution of the property of interest among the items in the lot. The differences between acceptance sampling and conformity assessment are summarized in the following table.</p> <p>We suggest the table on page 7 should be labelled as 'Table 1: Differences between acceptance sampling and conformity assessment'.</p>	Australia
2.3 Acceptance Sampling Plan Performance		
Section 2.3, 'Acceptance Sampling Plan Performance' end of first paragraph – remove strikethrough above the full stop.		Australia
3. Design of Sampling Plans		
3.2.2 Fitness for purpose		
Fairness		
<p>With regard to fairness must involve airness, consideration of both the consumer's risk and the producer's risk, <u>risk is necessary</u> to avoid situations such as the following:</p> <p>In Codex guidelines, "must" is not used and should is used instead. Japan proposes to change the beginning of the text as follows: With regard to fairness, consideration of both ...</p>		Japan
3 bullet point	<p>sampling plans not based on statistically valid principles, e.g. ad hoc plans or plans that do not (properly) allow for measurement uncertainty.</p> <p>If both parties agree to use a sampling plans not based on statistically valid principles (e.g. empirical sampling plan), there are no issues on fairness. Deletion proposed.</p>	
Practicality		
1st bullet point	<p>managing average non-compliance rates over the medium to long term, rather than possibly paying a high premium in terms of testing costs for high levels of assurance on a lot-by-lot basis <u>basis if suitable</u>.</p> <p>It may be applicable to process management or continuous lot, but not applicable to testing of isolated lot at export. Propose to add "if suitable"</p>	Japan
2nd bullet point	<p>the use of 'indifference' plans that are designed around the 'Indifference Quality Level' (IQL), the level of defects at which there is 50% acceptance, rather than based on PRQ, CRQ. This leads to plans having more manageable sample sizes</p> <p>'Indifference' plans and IQL are not defined in this document. For understanding of readers who are not familiar with these terms, they should be clearly defined in definition section.</p>	
3.2.3 Specification limits		

2nd para	The '(refer section 5.2.1).' may need amendments as this section '5.2.1 Measurement uncertainty' doesn't mention 'true' values.	Australia
Offsets		
1st para	It is important to consider whether a given specification limit has an in-built offset (guard band), and whether the offset reflects the measurement uncertainty associated with a particular testing procedure. Like section 2.1, this text indicates sampling plan specifies method of analysis because guard band and MU associate with method of analysis. This is not the normal practice in CCMAS. Through discussion at the plenary is needed. Note that it may request to review all of the methods of analysis in CXS234 and remove methods not associated with sampling plan – serious impact on commodity standards.	Japan
3.2.4 Lot homogeneity		
1st para	Acceptance sampling plans are usually based on the assumption that lots are homogeneous; indeed, the international definition of a lot is 'a quantity of product produced under conditions presumed uniform'. The definition of "lot" in this text is not in line with that in section 1.3. Consistency needed.	Japan
3.2.5 Distribution of the characteristic		
2nd para	In the case of variables data, the assumed statistical distribution of the measurements in the lot must <u>should</u> also be specified, i.e. whether the characteristic is normally distributed, a compositional proportion, or follows some other distribution. If is not possible to make an assumption regarding the distribution of the data, results can be classified as attributes (as long as measurement uncertainty is negligible (refer section 3.2.8), or plans based on the Fractional Nonconformance (FNC) method can be used (as long as measurement uncertainty is non-negligible (refer section 5.2.6)). Use should instead must for guidelines.	Japan
4. Sampling Plans		
4.2.1 Introduction		
The diagram under the introduction is suggested to be transferred to Appendix I Rationale: Appendix I demonstrate on how to select a sampling plan which can be better demonstrated through a diagram		Philippines
4.2.2 Two-class attributes plans		
1st para	Two-class attributes plans are defined by two numbers: the sample size n , the number of items to be taken from the lot under inspection and the acceptance number c , the maximum number of nonconforming items allowed in the sample for acceptance of the lot. If the number of nonconforming items in the sample is less than or equal to c then the lot can be accepted. If the number of nonconforming items found is greater than c then the lot is rejected. In their most general form, the number of samples n and the acceptance number c for these plans are determined from specifications of the allowable consumer's and producer's risks. It should be noted that c need not be zero (refer section 4.2.5).	Brazil

	Brazil suggests checking if the information given in the last sentence of this paragraph is consistent: "It should be noted that c need not be zero (refer section 4.2.5)".	
4.3 Inspection by Variables Plans		
4.3.1 Introduction		
	The diagram under the introduction is suggested to be transferred to Appendix I. Rationale: Appendix I demonstrate on how to select a sampling plan which can be better demonstrated through a diagram	Philippines
4.4 Sampling of Bulk Materials		
4.4.1 Introduction		
	Section 4.4.1 'Introduction', second dot point. We suggest the footer reference '12', should have the strikethrough removed	Australia
2nd para 3rd bullet point	control during processing Since the scope of this document is for import/export inspection, this is not relevant. Deletion proposed.	Japan
6th bullet point	experimentation and analysis to determine further sampling procedures and uses of the material. It is not clear what kind of situation is expected. We propose to delete this part unless further explanation is available.	
3rd para	Sampling units are created at the time of sampling by means of some kind of sampling device. The sampling units change depending on different factors such as how the device is employed, and the conditions that the device is used under. "Sampling device" is an important part when considering sampling. If the guideline refers to sampling device, further explanation is needed. Otherwise, deletion of reference to sampling device is acceptable.	
4.4.2 Theory of Sampling		
1st para	'The Theory of Sampling provides...', we suggest this was capitalised for a citation footnote, "Esbensen, Kim & Wagner, Cooper. (2015). Theory of sampling (TOS) - Fundamental definitions and concepts. 27. 22-25". Suggest either removal of capitalisation, or re-insert citation footnote.	Australia

4.4.3 Terminology		
This text has Section 1.3 definitions. The definitions in this section should be included in Section 1.3 so that users can easily find definitions of terms.		Japan
4.4.4 Illustration of terms		
Sampling operation (figure) Terms in the picture, such as primary sample, composite sample, laboratory sample and test sample, should be defined in definition section. In addition, this figure seems to be copied from somewhere. Japan is wondering if the rights of its intellectual properties are solved.		Japan
4.4.5 Design of general sampling plans for bulk materials		
2nd para	Suggest amendment '.....homogeneous (refer section 3.2.74). Special techniques are required...'	Australia
4.4.7 Variables plans for bulk materials		
4th para	Suggested amendment 'Since bulk materials are continuous, parts of each sample can be mixed to form a composite sample.'	Australia
4.4.9 Variables plans for percentage nonconforming (minimum or maximum limits)		
1st para	The strategy is similar to the design of variables plans for the average level except that an additional allowance must-should be made for variation within the lot, obtainable from the statistical analysis described in section 4.4.5. A simpler approach is to estimate within lot variation as the variation among the segments by taking one sample from each segment and testing those samples in duplicate to allow adjustment for measurement uncertainty, although this will not provide any information on other components of variation: Should instead of must should be used.	Japan
5. Inspection error and measurement uncertainty		
	Chapter 5 is - perhaps by the nature of the subject - quite complex. As it deals primarily with the application of acceptance sampling in certain exceptional situations, it could be moved to the e-book, where more explanations could be given and illustrated through suitable examples.	European Union
1st para	Non-negligible analytical measurement uncertainty and inspection error have the potential to affect the probabilities of acceptance of a sampling plan. Accordingly, non-negligible analytical measurement uncertainty or inspection error must-should be taken into account in sampling inspection. Should should be used instead of must	Japan

5.2.1 Measurement uncertainty		
	Measurement Uncertainty has already been explained in CXG54, which has been just revised. Japan proposes to delete duplicated texts already included in CXG54, in order to make this guideline more focused text. We believe shorter guideline without duplication will be more helpful to users.	Japan
2nd para	A laboratory sample is a sample as prepared (from the lot) for sending to the laboratory and intended for inspection or testing This definition should be moved to definition section.	Japan
Role of measurement uncertainty in acceptance sampling		
1st para	The lot standard deviation represents variation of the characteristic across items in the lot under inspection. Accordingly, it can be said that the <i>sampling</i> component of measurement uncertainty is <i>represented</i> by the lot standard deviation, even though, conceptually, sampling uncertainty is not the same as the lot standard deviation ¹² . Accordingly, the question is whether <i>analytical</i> measurement uncertainty sources affect the calculation of the lot standard deviation ¹³ . The lot standard deviation is not a component of measurement uncertainty, whereas sampling uncertainty is. This text conflicts with the definition of Measurement Uncertainty in CXG-54, in which measurement uncertainty does not include uncertainty from sampling.	Japan
In statistical terms, this point can be made as follows: If the distribution of the property of interest in the lot follows a normal distribution, and if the sampling procedure is adequate (meaning that the noncentral <i>t</i> -distribution can be applied), then the calculation of the probability of acceptance takes into account the sampling uncertainty (the statistical uncertainty of the estimate of the lot standard deviation). We propose to include more explanation to help users, who are not familiar with sampling, to understand.		
5.2.3 Top-down approach: the ISO 5725-2 model		
2nd para	For a more general model, see the Guidelines on Measurement Uncertainty (CXG 54-2004) The term “approaches”, instead of “model”, is used in paras 12-13 of CXG54. For consistency with CXG54, we suggest to revise the sentence as follows: “For common top-down approaches, see the General guidelines on Measurement Uncertainty (CXG 54-2004)”.	Japan
6. Other Matters Relating to Sampling		
6.1.2 Convenience sampling		
2nd para	There are usually more disadvantages than advantages with convenience sampling. There is a possibility of sampling error and lack of adequate representation of the population, and furthermore, use of convenience sampling might lead to disputes as it is neither a fair nor a valid procedure. We propose to delete the sentence. If both parties agree with using a convenience sampling, we do not expect any disputes about it, which is the utmost advantage in the trade.	Japan

6.2 Reinspection		
	<p>Inclusion of reinspection in the guidelines on sampling is not appropriate because reinspection is related not only to sampling but to whole testing process. In addition, Codex has already developed a guideline on settling dispute over analytical values (CXG70), so that duplication is not appropriate.</p> <p>We propose to delete this section. Otherwise, in line with CXG70, we propose to include at the beginning of the paragraph as follows: Reinspection in this text can be applicable if both parties agree on using this guideline.</p>	Japan
6th para 2 nd bullet point	11. Section 6.2 'Reinspection', second last dot point. Suggested amendment '● the lot may have been rejected due to an inappropriate sampling procedure or poor sampling practice, or'.	Australia
APPENDIX I GUIDE TO THE SELECTION AND DESIGN OF SAMPLING PLANS		
	Appendix I guides users through the work flow for the selection of sampling plans appropriate for the most common use cases of Codex Commodity Committees. The provided examples highlight the high number of samples that need to be tested if PRQ and CRQ are maintained at low levels of nonconforming items. Even if user will have the opportunity to 'experiment' with the ShinyApps in the e-book to find solutions requiring a lower number of samples, certain 'prefabricated' plans from the ISO standards should be offered for the orientation of less experienced users (e.g. by referring to the ISO plans in Annex II).	European Union
1. Introduction		
1st para	This section-Appendix provides a high level summary of the principles relating to the design of sampling plans and to the various types of sampling plans discussed in the main document.	Japan
1.1 Selection of Options for Sampling Plans		
	1.1 Selection of Options for Sampling Plans will be easier understood if presented as decision tree Rationale: refer to the figure below for the Decision Tree (page 13)	Philippines
Type of data: Are the test results expressed as pass/fail outcomes (or equivalent) or are they measurements?		
	<p>a. "1.Type of data" should be "Nature of the Provision" Does the provision apply to the overall distribution (most of the lot must comply) or to the average level?</p> <p>b. "2. Type of data" and so on..</p> <p>This is demonstrated in the given examples 1 and 2 on page 38 and 40</p> <p>Rationale: 1.1 Selection of Options for sampling Plan Options</p> <p>A. Determine Sampling Plan Options</p> <p>1. Nature of the Provision</p> <p>Does the provision apply to the overall distribution (most of the lot must comply)or the average level?</p> <p>Overall Distribution Go to step 2</p> <p>Average Level Go to Step 9</p> <p>then adjust the succeeding numbers</p>	Philippines

