

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 5

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

40th Session

Budapest, Hungary, 27 - 31 May 2019

REVISION OF THE RECOMMENDED METHODS OF CXS 234
Comments of EU, Mexico, New Zealand, Republic of Korea and Thailand

EU

*Mixed Competence
Member State Vote*

The EUMS suggest a few editorial changes/clarifications relating to:

Section 2. Definition of Terms, in particular:

- 2.3 Provision: 'analytical parameter' is a very broad term and could be replaced by 'requirement' or 'characteristic' or 'feature' or 'attribute'.
- 2.4 Method criteria: mentions next to 'provision', also 'criterion' or 'characteristic', without explaining the difference between these terms. If no difference exists, 'provision' would be sufficient.

Part II. Section I for several provision/commodity combinations references to CXSs are missing; it would be useful to include them.

Appendix II, which lists the analytical principles of the methods of analysis, the detection principle for methods involving chromatographic separation should also be given to obtain a more coherent and uniform nomenclature. For example, gas chromatography – flame ionization detection instead of gas chromatography, or high performance liquid chromatography – fluorimetric detection instead of high performance liquid chromatography.

MEXICO

ENGLISH

General

Mexico agrees with the introduction and the preamble presented in the CX / MAS 19/40/5.

General

Mexico agrees with the document structure presented in CX / MAS 19/40/5.

ESPAÑOL

General

No se tienen comentarios a la introducción y al preámbulo presentados en el CX/MAS 19/40/5

General

Se está de acuerdo con la estructura del documento presentado en el CX/MAS 19/40/5

NEW ZEALAND

General comment

Introduction

The terminology should be aligned as described in paragraph 4 of the covering paper, e.g. replacing "criterion" with "analytical parameter"; replacing "CXStdard" with "CXs". This comment also applies to later sections.

The final reference (or references) listed in footnote 1 should be clarified, and its relationship to CXG 64.

Queries:

- Paras 1, 2 and 5 of the Introduction present somewhat different versions of the purpose of Codex methods of analysis and sampling. Which is preferable? Can they be rationalised?

Other purposes are mentioned in the CPM. Should they be included?

“They should be used for reference, in calibration of methods in use or introduced for routine examination and control purposes.”

Preamble

Section 2.1: It would be preferable to include the referenced text from the Procedural Manual, so all the relevant information is in one place.

REPUBLIC OF KOREA

- We support the structural changes made to the draft such as the addition of Part I. Preamble for clarification of terms and the insertion of links in Section I for easier identification of methods and method performance criteria.
- We would like to point out that it may be necessary to make changes in paragraph 5 of Introduction and the definition of “Codex Methods of Analysis” according to the discussion and decision made on the endorsement and maintaining of methods without specific provision in Codex standards under Agenda Item 4 (Guidance on Endorsement).
- We would like to propose the following changes in Definition of Terms under Part 1. Preamble.

Current term in draft	Proposed change	Rationale
CXSdards	Codex standards (CXS)	It seems that the term (abbreviation) “CXSdards” is not used in other Codex documents nor by other Codex Committees.
Method criteria	Method performance criteria	The term “Method performance criteria” is used instead of “Method criteria” in the document. Therefore, Definition of Terms should be changed accordingly.

THAILAND

General Comments

- As we are aware that the document covers methods of analysis and sampling for Codex (Commodity) Committees, however, its scope should clearly define that which Committees’ methods of analysis are exempt from the document.
- The Revision of the CXS 234 should take into account other standards that cover methods of analysis and sampling adopted by Codex Committees, other than CCMAS, such as General Methods of Analysis for Contaminants (CXS 228-2001) and General Methods of Analysis for Food Additives (CXS 239-2003).

Specific Comments

We would like to confirm our previous comments as follows:

Introduction & Part I Preamble

We agree with Introduction and Part I: Preamble (including Scope and Definition of Terms).

Part II: Method of analysis

- Context and description provided in this section should be in line with those agreed by 39th CCMAS (Appendix III, Rep 18/MAS). And, we recommend to additionally amend Appendix III as follows:
 - Paragraph 2, Appendix III, Rep 18/MAS

The words “a forward slash “/” ” should be replaced with “line/ or”.

➤ Paragraph 3, Appendix III, Rep 18/MAS

We propose to replace this paragraph 3 with paragraph 5 of Section: Introduction in Appendix I of CX/MAS 17/38/6 (considered in 38th CCMAS).

Therefore, the context of Part II: Method of analysis should be revised to read:

“Part II: Method of analysis

The most updated version of the method should be used in application of ISO/IEC 17025 unless it is not appropriate or possible to do so. Each line of the methods list corresponds to one method of analysis or more than one if they are necessary to reach a result, in this case they are called complementary with an “and” between them. When a provision is determined by calculation, a brief description of the calculation shall be given in the principle column.

When the methods are in the same row separated by a vertical bar “|”, they are identical and published in a single document by different standards development organizations. When methods are separated ~~by a forward slash “/”, line/ or~~ the technical procedures are identical and published in separate documents that may have different formats.

Method list in **this section** could be used for any purpose in line with the principle of this standard and Procedure Manual. They could be used for national regulation, control and inspection. Method Type III and IV **can be used** in case of disputes, if it was agreed between the respective competent authorities, according to the Guidelines for Settling Disputes on Analytical (Test) Results (CAC/GL 70-2009). Methods listed in the Section II could be used for any purpose in line with the Principles of this standard and the Procedural Manual. They could be used for national regulation, control and inspection. Methods Type III and IV can also be used in cases of disputes, if it was agreed.

~~All Codex methods, including Type IV methods, could be used for control, inspection and regulation and when parties so agreed, for resolution of disputes. A Type I method determines a value that can only be arrived at in terms of the method per se and serves by definition as the only method for establishing the accepted value of the item measured. A Type II method is the one designated Reference Method where Type I methods do not apply. A Type III Method is one which meets the criteria required by the Committee on Methods of Analysis and Sampling and a Type IV is a method which has been used traditionally or else has been recently introduced but for which the criteria required for acceptance by the Committee on Methods of Analysis and Sampling have not yet been determined.]”~~

2. Section I – Section IV

• Section I: Methods of Analysis and Method Performance Criteria by Commodity Categories

Section I should be removed as its provided information is insufficient, meanwhile information on the methods of analysis and performance criteria are already indicated in other related sections (including section II, III, IV).

The linkage to other related sections proposed in this section could cause unnecessary complication.

• Section III: Method of Analysis by Commodity Categories

1) In general, we agree with information provided in this section, however the commodity categorization should be aligned with the commodities as currently described in CXS 234 3. And, methods that are out of date should be updated, including those developed by international organizations e.g. AOAC, IDF, ISO, etc and CAC/RMs.

2) To provide comprehensive information in this section, our additional recommendations are as follows:

- Information on relevant Codex Standards should be additionally inserted in this section

- CAC/RMs should be retained in this section in line with the current CXS 234. However, commodity committees should consider to amend CAC/RMs (that are out of date) to updated methods or use standard methods appropriate for the commodity.

• Section IV: Complete Description of the Method of Analysis

This section should be removed, as the description of the method of analysis should be described in Section III, which presents methods by commodity categories, to avoid confusion.

3. **In conclusion**, we propose that Part II: Method of analysis should include only Section III: Method of Analysis by Commodity Categories and additional information on relevant Codex Standards. Part II should then read as follows:

“Part II: Methods of Analysis

Methods of Analysis by Commodity Categories

Commodity	Provision	Method	Principle	Type	<u>Codex standard</u>

PART III: Methods of Sampling by Commodity Categories and Names

We agree with information in Part III because “methods of sampling and sampling plans described in standards” are already indicated in Codex commodity standards, so it is not necessary to include their detail in this Part III.

List of Provisions of Methods (Appendix III)

According to 39th CCMAS, we support that the list should be Annexes to CXS 234 which is an internal document for CCMAS.

List of Commodities Categories and Names (Appendix IV)

According to 39th CCMAS,

1. We support that the list should be Annexes to CXS 234 which is an internal document for CCMAS.
2. The categorization of commodity in the list should be aligned with the commodities as described in the current CXS 234 which reflect the Codex food category system.