codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 3 **CX/MAS 02/3-Add.2**

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

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PROPOSED DRAFT GENERAL GUIDELINES ON SAMPLING
GOVERNMENT COMMENTS AT STEP 3

NEW ZEALAND

GENERAL COMMENTS

While we appreciate the efforts of the drafting group we continue to have significant concerns with the structure and content of the latest draft which we believe is still in need of major revision. New Zealand made detailed comments on the previous draft (see CX/MAS 01/3-Add.1). Whilst some of these comments have been addressed, many other issues that we raised don't appear to have been taken into account in the revised text. We note that while New Zealand is mentioned as a member of the drafting group, we have not been included in the drafting group's work.

General approach

The stated primary target audience of the Guidelines is Codex commodity committees, but we consider this document will not meet their requirements. The document is still far from being user-friendly, and is too long and complex to be useful. It is still rather disorganised and the level of detail varies considerably, ranging from ad hoc advice to detailed statistical theory.

We expect that the principal users will be non-statisticians who will be seeking a "recipe book" approach. The document must be much shorter and written as guidelines, not as substitutes for the underlying ISO standards which should remain the reference documents.

To improve usability, the decision trees and Table 1 should lead the reader to the section relevant to a particular situation, but at present they are very confusing. We suggest that the decision rules for lot acceptance/rejection (point 8 of the Foreword), Table 1, and section 2.5.1.4 should be combined, and the examples should be made more informative.

Producers' and consumers' risks

In general it is not appropriate for suppliers and "customers" to use the same sampling plans for inspection of the same product, unless these plans have been set considering both producers' and consumers' risks (which will not be achieved by setting the AQL or the LQ). This important point is not well understood and needs to be highlighted in the guidelines.

It is the intention of the ISO Standards (ISO8550) that suppliers and customers agree on the risks that can be tolerated, and formulate sampling plans which are applied by suppliers to control these risks accordingly. However the guidelines seem to propose sampling plans developed from either the producers' or the customers' perspective which can then be used by all parties. This may result in the risks to either party not being adequately controlled.

Guidance on selection of sampling plans

For the guidelines to be useful and indeed workable at all, it is necessary that the Codex commodity committees (and others) provide guidance on the inspection standards to be applied in different situations. The guidelines provide only a template, presenting the various types of sampling plans that are available, with

examples of each. The situation will determine which types of sampling plan can be used, but more specific guidance is required to determine the actual sampling plan.

It would be helpful if examples of sampling plans, which are one of the main reasons for these guidelines, followed a consistent format. We suggest a brief description, the formula for the characteristic operating curve, an example with a brief explanation as to the choice of parameters and the efficiency of the plan. Each plan should be no more than one page.

Examples

Some of the examples presented to illustrate concepts are unclear, debatable or even incorrect. For example the "fat content of skimmed milk" does not appear to be definable as "individual items" and similarly, lead content in apples could be regarded as a continuum more than a collection of discrete items. Equally concerning is the way in which some examples create precedents for certain types of inspections - for example the testing of conformance for salmonella with only five samples would accept lots containing 20% of contaminated product one third of the time, which we consider quite unsatisfactory even if one allows that the vegetables may be cooked.

Examples should also be written in a “neutral” style, for example in Section 2.2.18 the example could refer to "inspection of a lot of 8500 items by an attribute sampling plan..." without any loss of meaning.

Definitions and explanations

In a few cases definitions which have been presented clearly in ISO Standards have been rewritten with the effect that clarity has been lost. One obvious instance, pointed out in the previous New Zealand comments, is the absence of either clear or the official definitions of AQL and LQ.

Some explanations should be written in a way that is clearer, for example:

- Samples and increments (2.2.3 and 2.5.1.1)
- Item or increment of individualisable goods (2.2.7)
- Homogeneity (the note in 2.2.10)
- Primary samples, composite sample and final sample (2.3.4).

SPECIFIC COMMENTS

We reiterate briefly points from our previous comments that still need to be addressed.

Representative samples

This concept has no place in the guidelines if assessments of commodities are to be fair.

Pragmatic, Empirical, Convenience and Punctual Sampling

These terms remain undefined.

Sampling

The guidelines should provide information on the selection of random samples, and should include cautions on the use of non-random sampling.

ICMSF sampling plans

These plans assume homogeneity of lots inspected, which may not be valid for microbiological contamination. Further, the stringency of these plans is rather poor, especially when as few as five samples is employed.

Composite samples

Composite sampling is defined but plays no part in the sampling plans presented in the guidelines.

Measurement error

The guidelines should state prominently (not just in a sentence tucked in 2.4) that the sampling plans presented assume that measurement error is negligible in comparison with sampling error, and should give practical guidance as to when measurement error can be ignored. There should also either be a statement that the guidelines do not address situations where measurement error is not negligible, or at least some reference to how this is handled.

Non-homogeneity

The guidelines should clearly state that non-homogeneity is not addressed, or if not, then they should include text (or a reference to guidance elsewhere) as to how non-homogenous situations could be handled.