

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 3.3

MAS/40 CRD/17

ORIGINAL LANGUAGE ONLY

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

40th Session
Budapest, Hungary, 27 – 31 May 2019

REVIEW OF Cereals, pulses and legumes workable package

(Comments submitted by AACC and AOAC)

AACC and AOAC

AACC and AOAC appreciate the opportunity to provide the following background and comments, and to propose changes to the methods endorsed for Gluten-Free Foods in CXS 234.

AACC and AOAC are responding to the needs of the GF community by making sure that analytical methods are validated and fit for purpose.

AACC and AOAC are also responding to the needs of their members, who have similar concerns, especially when diversity among gluten-free food matrices do not allow for a one-method-fits-all approach. The “Gluten Free Foods” category has evolved to be quite heterogeneous, and different methods may be required to assure the accuracy of analytical results across the entire category.

The history and consensus of CCMAS has been to endorse methods which have been experimentally validated and shown fitness for purpose for the commodities and provisions that they are endorsed. It is in this spirit that we offer these proposed changes to the gluten method endorsement.

We appreciate the desire to have a single method for all gluten free foods, and we are aware that the R5 sandwich ELISA method is currently being used for a wide variety of food matrices. However, as Standard Development Organizations, we are limited in what we can recommend to CCMAS in terms of scientifically validated methods. The standards and procedures used by AACC and AOAC to approve methods require us to only allow claims for validation based on the matrices that have been experimentally studied. Any extension of a method to other matrices without proper study may result in unknown and unintentional inaccuracies, and can lead to serious consequences for consumers, in particular coeliac patients. We take these issues very seriously and are diligent in assuring the integrity of method approvals.

In the case of this specific method validation, both AACC and AOAC have studied this R5 sandwich ELISA method and have approved it for use on rice and corn-based foods. It may indeed be accurate and fit for purpose for other types of materials, but as yet, we have not received data for other matrices. We welcome any data on this, and are open to potential extension of the scope of this method approval. At this point in time, we recommend to CCMAS that the current method is valid for corn and rice-based foods, and the Codex method endorsement should be limited in its scope to these commodities, which were the matrices which have been studied in collaborative trials.

For more information, please refer to CX/MAS 19/40/3 Add. 2

Attachment: [Collaborative Trial manuscript of AOAC Official Method of Analysis 2018.15](#)