

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4

MAS/39 CRD/5

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON METHODS OF ANALYSIS SAMPLING

Thirty-ninth Session

Budapest, Hungary, 7 – 11 May 2018

REVISION OF THE RECOMMENDED METHODS OF CODEX STAN 234 / REVIEW AND UPDATE OF CODEX STAN 234

(Comments submitted by European Union and Sudan)

EUROPEAN UNION (EU)

The European Union and its Member States (EUMS) congratulate the eWG lead by Brazil and Uruguay for the excellent work done and support fully the development of a single reference for the methods of analysis and sampling. Furthermore, the development of a searchable database, which will facilitate reviewing and updating of methods of analysis and sampling, is undoubtedly of great value for the work of CCMAS and therefore strongly supported by the EUMS.

The engagement of ISO/IDF/AOAC in the pilot to review the dairy related methods contained in the Codex STAN 234 is also acknowledged.

As regards para 2.3 *Technically equivalent methods* of the Preamble of the proposed new version of STAN 234, the EUMS wishes to draw the attention of the Committee to discussion held at CCMAS36 and CCMAS37 related to the equivalence of methods. The US delegation presented a statistical approach for establishing equivalence between defining methods (Type I methods) although the approach may be used for any two methods, regardless of type. As CCMAS37 did not reach consensus on the use and scope of the equivalency approach, it appears appropriate to stress that the concept of equivalence of methods is not applicable to Type I methods. Furthermore, it is recommended to delete the second sentence, as CCMAS has no accepted approach for establishing the equivalency of methods.

The definition of Provision as proposed in the first sentence of para 2.5 is ambiguous; therefore, it is recommended to delete the first sentence.

In Part II – Recommended methods of analysis, only identical Type I methods may be used for verification of provisions defined via that type of method (defining method).

The EUMS generally welcome the intention to harmonise and simplify the name of commodities, provisions and analytical techniques (Annexes I to III). Nevertheless, the proposal would require changing the correlated commodity standards, which goes beyond the scope of the revision of Codex STAN 234. Therefore, the EUMS recommend either to keep the current status, or to seek first agreement from the concerned commodity committees to modify the name of commodities and provisions in their standards.

In Annex III the term 'Gas Chromatography' should be changed to 'Gas-Liquid Chromatography' and the detection system used, e.g a Flame-Ionisation Detector (FID), identified. The proposed list of techniques still contains next to HPLC the term LC; it should be clarified whether LC indeed refers to liquid chromatography under gravity flow.

Concerning the recommendations proposed in the Add.1, recommended methods of analysis for milk and milk products, under the first bullet point, second sub-bullet, the EUMS would like to stress that if a defining method has been fully validated, but not on the specific matrix under consideration, then this method should be typed as a Type IV method.

SUDAN

The Republic of Sudan wish to submit the following comments; just for consistency the proposed comments as follows;

First comment;**PART I PREAMBLE****1. Scope**

This Standard contains preamble, lists of methods of analysis, and a list of methods of sampling which are recommended by the Codex Alimentarius Commission (CAC) to verify the provisions in Codex standards to be applied to commodities moving in international trade.

OR

This Standard contains preamble, definitions, standardize methods of analysis, methods performance criteria, descriptions of some methods and a list of methods of sampling which are recommended by the Codex Alimentarius Commission (CAC) to verify the provisions in Codex standards to be applied to commodities moving in international trade.

Second comment;

The document must consist of references because; The Recommended Methods of Analysis and Sampling (CXS 234-1999) (Appendix I) is a result of the discussion of the EWG and the comments made to the previous documents (CX/MAS 17/38/6, CL 2017/4 – MAS, CX/MAS 17/38/6 - Add.1, MAS/38 CRD3) and other references.