

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda item 4

CRD12

Original Language Only

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

40<sup>th</sup> Session

Budapest, Hungary, 27 - 31 May 2019

GUIDANCE ON ENDORSEMENT

*Comments of Thailand*

Thailand

### Comprehensive Guidance for the Process of Submission, Consideration and Endorsement of Methods for Inclusion in CXS234

#### General comments

In general, we support the mentioned guidance that will clarify the current CCMAS' endorsement process and improve the process' consistency and transparency.

#### Specific comments

We have comments on specific sections and questions as follows:

##### ● **Preamble/Intro**

###### - "SDOs"

For the first mention in a document, "SDOs" should be defined as "Standard Development Organisation" for clear understanding, as the word is understood and used by CCMAS' internal work, meanwhile the Codex Procedural Manual does not mention and identify a definition for this word.

##### ● **Definition of Identical, Complementary and Mutually Exclusive**

We agree with the definitions for Identical, Complementary and Mutually Exclusive that are defined in Section 2: Definitions.

##### ● **Table 2.2: Guidance on Method Listing in CXS234**

Question: Type III Method when no Type II exists

For Type III method, "[Cannot exist without a Type II]" should be removed, as it does not comply with the definition of Type II method in the Codex Procedural Manual which states "A Type II method is the one designated Reference Method where Type I methods do not apply. It should be selected from Type III methods.....".

##### ● **Section 3: Process for the Submission of methods of Analysis for Provisions in Codex Documents**

###### - **Section 3.2 i**

Question: Methods without Specification in a Codex Standard

We agree to endorse/maintain methods with no related specification in commodity standards; however a related specification of Codex General Subject Committees exists, such as maximum level for melamine for infant formula and milk and milk products that are elaborated by CCFC-

###### - **Section 3.2 ii**

To be clear and practical, 3.2 ii should be revised to read:

"When a committee works on a specification during the development process and before submission to CCMAS, **whenever possible** the commodity **committees experts** should:"

###### - **Section 3.2 iii**

1) This section should be revised to read:

“3.2 ii Proposal of methods of analysis to CCMAS for endorsement should be carried out with the knowledge that the methods of analysis meet the above criteria ~~(ii-a-f)~~.”

2) Introductory text should be added before a-c.

**- Section 3.8 : Type IV methods and their transitioning to other method types**

**- 3.8 i.**

We agree with 3.8 i, since a method with lesser validation data should be list as Type IV.

**- Section 3.9: Presentation of methods for incorporation into CXS 234**

1) 3.9 if should be removed, since validation data are already considered in the endorsement of methods of analysis

2) 3.9 iii should be removed