

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

CX/MAS 17/38/6-Add.1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING
38th Session
Budapest, Hungary, 8 - 12 May 2017

REVIEW AND UPDATE OF METHODS IN CODEX STAN 234-1999:
PROPOSED PREAMBLE AND STRUCTURE OF CODEX STAN 234-1999 (replies to CL 2017/4-MAS)

Comments of Argentina, Canada, Japan, New Zealand and Switzerland

Argentina

GENERAL COMMENTS

Argentina would like to thank Brazil and Uruguay for their valuable work on the review document for the standard.

SPECIFIC COMMENTS

The Committee is invited to consider the following points:

- We agree with the introduction and wording of the proposed preamble and structure of the standard presented in Appendix I.
- We would like to point out that in the list of commodities (Annex 1) under sub-category 8.3.1. "Unripened Cheese", the commodity "extra hard grating cheese" has been added (under 8.3.1.4.). Given that this is a mature cheese we suggest that it should be included under sub-category 8.3.2. "Ripened Cheese".
- In order to maintain the order and optimization of work already undertaken by the eWG, which is in the process of reviewing CODEX STAN 234-1999, we believe that it is not necessary to set up a specific electronic working group to discuss criteria on general methods of analysis for food.
- We agree that it is important to harmonize the list of commodities, provisions and principles of the methods, taking the Annexes 1, 2 and 3 as a starting point.

We agree with the proposed suggestions for each of the workable packages on the understanding that their content will be analysed in subsequent work.

Canada

GENERAL COMMENTS

The work on updating the STAN 234 is essential to ensure that it contains the correct information, is still relevant to the Codex provisions and is readily available and relevant to the user.

Canada looks forward to the discussion in plenary on how to best proceed with this very important work and to address the questions being proposed in this paper. The paper is addressing a number of key issues which have been separated out in the comments below.

SPECIFIC COMMENTS

1) CODEX STAN 234 - layout

Respecting the good work of the eWG who has given thought to the general methods and the methods of analysis by commodity while at the same time addressing the use friendliness of the documents, could consideration be given to searchable database that would allow for searches based on the analyte, provision and/or commodity?

CODEX STAN 234 – general methods and all food methods

The proposal to better define what a general method for Codex purposes is, would be useful.

With respect to the question of commodity specific versus general methods for various foods, versus all foods, consideration should be given to the commodities for which the method was validated.

The approach being considered involves methods applied to a large range of commodities. It is suggested that the Inter-Agency Meeting (IAM) or Standard Development Organization (SDO) be consulted for technical advice to determine if there is international consistency in method validation requirements (e.g. the AOAC food triangle) that would allow for a claim that a method has been validated in all food.

CODEX STAN 234- preamble

It is Canada's position that STAN 234 would benefit from both a preamble statement and a scope statement that clearly defines the scope and intent of STAN 234 and how it links to the Codex commodity, provisions and standards.

Beyond what is identified in CL 2017/4-MAS, Canada would propose an additional para such as:

When confirming compliance to a Codex standard the methods of analysis and sampling contained in this General Standard that relates to the provision identified in the commodity standard shall be used

Canada would support the continuation of the eWG to address the outstanding questions and to proceed with this very important work.

2) CODEX STAN 234 – Annex I

Consideration should be given to enhanced linkages to the Food classification system. If this is not considered appropriate then perhaps some text on why this is the case, would be appropriate.

3) Editorial suggestions

CX/MAS 17/ 38/6 refers to general methods as horizontal methods, Canada's preference would be to continue to use the term general methods and then define the term for Codex purposes.

The use of the term "all Foods method" which is proposed to be used when a matrix is destroyed, would not allow for "all food methods" based on other approaches such as the AOAC food triangle. Further discussion is required in regard to the intent of this statement.

2.2 Codex General methods last word should be purpose

2.4 codex should be a capital C

Japan

GENERAL COMMENTS

Japan supports to elaborate texts of introduction and preamble for this Standard to clarify the scope and provide useful information to users.

SPECIFIC COMMENTS

INTRODUCTION

Paragraph 2

The guidelines described in this paragraph are too many. For user friendliness, they should be placed in footnotes of this Standard.

For the actual use of the methods covered by the Standard, it is recommended that this Standard should be read in conjunction with the related Codex standards, guidelines and other documents.

SECTION I

Paragraph 1

Publication year for ISO/IEC 17025 should be retained, i.e. ISO/IEC 17025:2005. See REP13/MAS para. 88.

Paragraph 2

For the use of connecting symbols such as a forward slash, the CCMAS should ask for clarification by SDOs.

See REP 16/MAS para. 80.

Annex 1

For Annex 1: List of commodities categories and names, we propose to remove this annex from the Standard. The list of all commodity names that appear in STAN 234 may be useful for clarification of commodities (matrices) for which specific methods are applicable. However, in order to make the list truly useful, cooperation of the relevant commodity committees is to be sought.

New Zealand

GENERAL COMMENTS

Our comments relate both to the general approach taken as presented in the CX/MAS 17/38/6, as well as to the introduction, preamble and proposed structure, the content of the Annexes and a general comment on assistance should that be useful.

General approach

Following CCMAS 37, the terms of reference on the review and update of CODEX STAN 234-1999 were to:

- a. Continue working on the review and update of CODEX STAN 234-1999 to prepare workable packages to send to Codex secretariat in order to be considered by the PWG on endorsement;
- b. to make a recommendation on how to deal with the term “codex general methods”;
- c. to draft a preamble for CODEX STAN 234-1999.

CX/MAS 17/38/6 includes more substantial revision including for example, the categorisation that is Annex 1. This additional work is wider than that provided for in the terms of reference. Any such work should be conducted in accordance with the Codex Procedural Manual.

SPECIFIC COMMENTS

Introduction

1. We suggest it would be advisable to mention that the methods of analysis and sampling are for foods.
2. We suggest changing the format to clarify what the document is, and then to discuss the purpose. This could be done by stating what the document is in the first paragraph ‘a single reference to Codex recommended methods of analysis and sampling’. Then the next paragraph would discuss the purpose – which would be a combination of the remaining current paragraph 1, as well as the current paragraph 4 (The methods are primarily intended as...) & 5 (Methods listed in the Section II...).
3. Paragraph 3 (In case of disputes of analytical results...) references CAC/GL 70-2009. As this document is intended to be the ‘single’ or the ‘primary’ reference, either the words which among others refer to an included list of other references, or these words should be removed.
4. As noted above, paragraphs 4 and 5 describe the purposes or uses of the methods. It would be clearer if these paragraphs followed immediately after paragraph 1, where the purpose is mentioned.
5. Paragraph 5 describes a range of uses of methods listed in Section II, Codex General Methods. In fact this paragraph relates to Part II, Recommended Methods of Analysis.
6. Assuming point 3 is correct, it would be an advantage to merge paragraphs 4 and 5 into a single coherent paragraph.
7. Paragraph 5 refers to the “Principles of this standard”. It needs to be made clear what principles are referred to by this phrase.
8. Paragraph 5 also refers to the Procedural Manual. We assume this is a reference to the sections of the Procedural Manual headed PRINCIPLES FOR THE ESTABLISHMENT OF CODEX METHODS OF ANALYSIS and PRINCIPLES FOR THE ESTABLISHMENT OR SELECTION OF CODEX SAMPLING PROCEDURES. However the Procedural Manual is an internal Codex document for use by Codex committees, rather than a document for use by governments. It would be preferable to extract the relevant principles and include them in the proposed standard.
9. For consistency the title of Part III should be RECOMMENDED METHODS OF SAMPLING BY COMMODITY CATEGORIES AND NAMES.

Preamble

1. Section 1, Scope, should read: “This Standard contains definitions, lists of 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.~~” This wording describes the scope more accurately, without limiting the methods to one particular use.
2. Section 2.1, Codex Methods of Analysis. For the reasons noted above, the descriptions of the types of methods should be included in the standard, rather than by reference to the Procedural Manual.
3. Section 2.3, Principle. The second option for the definition of Principle is preferable, since the proposed list of principles in Annex 3 focuses on techniques.
4. Section 2.4, Provision in STAN 234. Since this draft standard is a revision of STAN 234, it would be preferable to define simply the word “provision”. In addition the definition, the words “compliance” and “comply” should be replaced by “conformity” and “conform”.

5. Part II, Paragraph 1, line 4 states, “When there is no standardized method ...”, and refers to section 4. However section 4 is a collection of standard methods. It would therefore be preferable to say, “When there is no standard method published elsewhere ...”
6. Section I – Methods of Analysis by Commodity Categories and Names. It would be preferable to use the wording from STAN 234: “The most updated version of the method should be used, in application of ISO/IEC 17025.”
7. Annex 1: List of Commodities Categories and Names. It is not clear that it makes sense to categorise foods in the same way that commodity committees do. Commodity committees categorise foods by (for instance) method of manufacture or consumer understanding, whereas a method of analysis is chosen according to (for instance) the level of the analyte and the presence of interfering substances. For instance in category 8.3, Cheese, the choice of method for determining fat content is not according to cheese variety out of the 17 listed, but according to lactose content, which can interfere with some methods.
8. Where commodities are listed, the list should be reviewed by commodity committees to avoid errors.

Proposed Structure

The proposed structure is straightforward and clear.

Annexes

We recommend further review of the technical information contained in the Annexes.

General

New Zealand would like to offer any assistance to edit the current introduction and preamble in relation to our comments.

Switzerland

SPECIFIC COMMENTS

List of commodities (Annex 1)

The harmonization of the list of commodities is certainly a valuable objective and the list produced here is a good start. However doing this, great care should be taken as even a slight change in the commodity name can change its meaning and therefore have potential legal and commercial consequences. This means, that the new names really have to be fully equivalent in their meaning as the old ones and that all commodities in existing Codex standard easily can be found in the new list. Based on the examples in following table, we believe that this was not yet achieved as some commodities could not be clearly identified in the new list.

Commodity name in existing Codex Standards		New proposal (Annex 1, list of commodities)
Frozen fish and fishery products	CODEX STAN 234-1999	?
Fruit Juices and Nectars	FRUIT JUICES AND NECTARS (CODEX STAN 247-2005)	?

We propose to delete the statement “The list of commodities is hierarchical, meaning that when a method of analyses is recognized for use in a general category, it is recognized for use in all its sub-categories, unless otherwise stated” as there would almost certainly exist examples where this does not apply and where it was not clearly stated as such.

We would recommend at this point, also to avoid overloading the working group, to content ourselves with a simple list of all Commodities already existing in Codex standards. Later on, a separate work item could be started to harmonize these names. This work would imply to update the related commodity standard accordingly.

List of provisions (Annex 2)

The harmonization of the list of provisions is certainly a valuable objective and the list produced here is a good start, however similarly as for the commodities, the equivalency of provision has to be carefully established.

Provision name suggested by e-WG	as	Provision name in the Commodity Standard (Ref)	Comments
Saxitoxin		Saxitoxin (STX) group (CODEX STAN 292-2008, STANDARD FOR LIVE AND RAW BIVALVE MOLLUSCS)	It is not the same to consider only the Saxitoxin or the whole STX group
Hydrogen stable isotope ratio		Stable hydrogen isotope ratio of water from fruit juices (Sections 3.2 Quality criteria and 3.3 Authenticity)	The information about the fraction on which the analysis is done is important and should be retained. I also recall that

		the scope (Sections 3.2 Quality criteria and 3.3 Authenticity) relevant was.
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Also here we recommend to draw a simple list of all Commodities already existing in Codex standards and to start a separate work item to harmonize these names.

List of principles (Annex 3)

Same comments apply as for annexes 1 and 2: please delegate this work to a separate working group.

First workable method packages

According to the process that we have defined by the 37th CCMAS (annex), the CCMAS should either re-endorse existing methods in ST234 or endorse a new method for the workable package listed below. At our understanding to propose a new method endorsement would be the job of either the countries or the SDOs?

List of WPs

WORKABLE PACKAGE 1- RM Methods

WORKABLE PACKAGE 2- Multiple Type II Methods

WORKABLE PACKAGE 3- Equivalency of Type II Methods

WORKABLE PACKAGE 4- Methods with Incorrections

WORKABLE PACKAGE 5- Provisions without a Type II method

