CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 3, 4.2, 5.1, 5.2, 6.2, 7 and 9 **MAS44/CRD29**

May 2025

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

44th Session

Virtual

5 – 8 May and 14 May 2025

COMMENTS OF GHANA

Agenda Item 3. ENDORSEMENT OF METHODS OF ANALYSIS AND SAMPLING PLANS FOR PROVISIONS IN CODEX STANDARDS

Position 1a: Ghana support the endorsement of AOAC 2022.01/ICC Standard 191/AACC 32-61.01 as a type I for the determination of insoluble and soluble dietary fibers of higher and lower molecular weight in food that may or may not contain resistant starch without the footnote.

Rationale: AOAC 2022.01which is the update for 2011.25 (AOAC 2022.01 has advantages over AOAC 2011.25). Without the footnote for uniformity

Position 1b. Ghana endorses the revocation of AOAC 2011.25/AACC 32-50.01

Rationale: AOAC 2011.25 is outdated for this provision.

Position 2. Ghana endorses methods listed in Appendix I (part A.2 and part B.1) for review, (re)typing, revocation, and endorsement as a type II or type III.

Rationale: A holistic review for (re)typing, revocation, and endorsement as a type II or type III should be done to update the methods of analysis.

Position 3. Ghana endorses the method for crude protein in follow-up formula as a type I, as indicated in Appendix I, part A.2

Rationale: It is safe and easy to use as a type I method.

Position 4a. Ghana also endorses the position of determining if these methods of analysis are still fit-for-purpose, and if yes, provide the principles and typing.

Rationale: It helps update the methods of analysis and revoke methods not fit for purpose.

Position 4b. Ghana endorses option 2.

Rationale: It is simple and has all the information on the face of the document, CXS 234-1999.

Position 5. Ghana endorses the approach mentioned in paragraph 5.

Rationale: For consistency

Agenda Item 4.2 DETERMINATION OF MOISTURE CONTENT IN WHEY POWDER

Position: Ghana endorses proposal 2, which suggests the reconstitution of the Electronic Working Group (EWG).

Rationale: The data provided is inadequate to support the endorsement.

There was no consensus among the EWG members. Also, more members or observers may want to join the EWG.

Agenda Item 5.1 REVIEW OF METHODS OF ANALYSIS IN CXS 234: FRUIT JUICES WORKABLE PACKAGE

Position 1. Ghana endorses the proposed changes to CXS 234-1999, as documented in Appendix I.

Rationale: The methods of analysis are updated and fit-for-purpose. It ensures that inconsistencies are resolved.

Position 2. Ghana supports the suggestion for the items indicated in Appendix II for further consideration.

Rationale: This will help resolve the inconsistencies, remove the outdated method, and address the typing errors

For guidance on the points raised in paragraphs 13 and 14:

Position 1. Ghana endorses the suggestion that new methods should be endorsed via the method endorsement process for the replacement of the withdrawn ENV 12142 and 12141, while allowing the IFU to publish its methods based on the CEN method.

Rationale: The provisions, “hydrogen isotope ratio of water” and the “stable oxygen isotope ratio of water,” are very important; hence, replacement methods of analysis should be endorsed.

Position 2: Ghana also suggest new methods should be endorsed via the method endorsement process to replace the IFU 42 (1976) method for determining carbon dioxide content.

Rationale: Carbon dioxide is a very important provision; new methods should be endorsed.

Agenda Item 5.2 REVIEW OF METHODS OF ANALYSIS IN CXS 234: COCOA PRODUCTS AND CHOCOLATE WORKABLE PACKAGE

Position 1: Ghana endorses the proposed changes to CXS 234-1999, as presented in Appendix I.

Rationale: These are updated methods of analysis

Position 2: Ghana supports the suggestion to revise CXS 87-1981, part 6.8.2, 'Qualitative Determination of Non-cocoa Butter vegetable fats' with the provisions 'Cocoa butter equivalents in Cocoa butter and plain Chocolates' and 'Cocoa butter equivalents in milk chocolate' as presented in Appendix II.

Rationale: The provisions are clearer with the suggested revision.

Agenda Item 6.2 REVIEW OF SAMPLING PLANS IN CXS 234

Position: Ghana endorse both recommendations.

1. The discussion paper on the inclusion of sampling plan information in CXS 234-1999 continues to be developed for consideration at CCMAS45, to expand on the options for further work as set out in paragraph 4 and Appendix I; and
2. The development of a discussion paper on sampling plans for bulk materials, including mycotoxins and including Bayesian approaches to be considered at CCMAS45.

Rationale: There is enough evidence based on the investigations undertaken that sampling plans should be developed further; thus, the need for review. Also, many CCMAS participants have expressed interest in a further review of the discussion paper.

Agenda Item 7 NUMERIC PERFORMANCE CRITERIA FOR NITRATE AND NITRITE IONS IN CERTAIN FOOD MATRICES

Position 1: Ghana supports the suggestion for CCMAS to consider, discuss, and agree on the numeric performance criteria for nitrates and nitrites in Appendices 1 and 2 and refer these to CCFA for consideration. Also, CCMAS should discuss and decide if more work is needed.

Rationale: Appendices 1 and 2 meet the request of the CCFA to CCMAS

Position 2. Ghana suggests that methods with inadequate data need supplementation. However, methods without suitable validation data for review should be discontinued.

Rationale: More data and discussion are required before any meaningful conclusion can be made regarding the suitability of the methods that could not be identified or included in Appendix 3.

Agenda Item 9. HARMONIZATION OF NAMES AND FORMAT FOR PRINCIPLES AND PROVISIONS IDENTIFIED IN CXS 234

Position: Ghana suggests that the provisions identified in CXS 234 remained aligned with those of the commodity standard.

Rationale: For clarity, uniformity and consistency.