



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

40th Session

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REVISION OF THE GENERAL STANDARD FOR METHODS OF ANALYSIS AND SAMPLING PLANS
(CXS 234) – PREAMBLE AND STRUCTURE

Replies to CL 2019/15 MAS

(Comments of Canada, Ecuador, Egypt, Norway, Peru and Switzerland)

CANADA

Canada is pleased to provide the following comments in response to CL 2019/15-MAS.

Specific Comments:

Part II. Methods of Analysis:

Canada suggests providing clarification of the difference between Section I and Section IV. For example, Section I provides the commodity and provision information with links to the method or performance criteria, while Section IV provides additional method information: principle and Type.

With respect to the paragraph beginning with “In general”, second line: suggest replacing “~~commands~~” with “**additional information**”.

Section I – Methods of Analysis and Method Performance Criteria by Commodity, (c) CXS to which the method is directed: suggest revision to “directed, **where appropriate**”.

Section IV – Methods of Analysis by Commodity Categories, (e): add a “d” at the end of the word “method”.

Section II - Provisions for which there are Method Performance Criteria (page 38): suggest “~~molar~~ concentrations”, as the concentrations are reported as ng/g, mg/kg, etc., and not a molar basis.

ECUADOR

GENERAL COMMENTS

With reference to Circular Letter No. CL 2019/15-MAS, by means of which the Codex Committee on Methods of Analysis and Sampling invites Codex members and observers to present their comments on the “DRAFT PREAMBLE AND DOCUMENT STRUCTURE FOR THE GENERAL STANDARD ON METHODS OF ANALYSIS AND SAMPLING (CXS 234-1999)” we inform the following:

Ecuador thanks the work done by the Electronic Working Group and considers supporting the document, since this standard would provide a unique reference to the methods of analysis and sampling of foods adopted by the Commission of Codex Alimentarius and would enable the authorities to select appropriate methods for analysis and sampling as well as verify the provisions, criteria or characteristics included in Codex standards.

EGYPT

Egypt appreciates the work done by EWG led by Brazil and Uruguay; and would like to highlight some comments as follows:

General Comments:

1. Moving the footnote in page 3 to a separate clause after the Scope of this Standard named “Normative Reference”
2. Delete the sentence (Part I. Preamble) from page no. 4 & 5 and merge this word with the Introduction as follows: (INTRODUCTION/PREAMBLE).

3. Add the following paragraph to be part of the introduction:

“6. All Codex Methods including Type IV can be used for control, inspection and regulation and when parties agree for resolution of disputes”.

4. Correct page no. 4 to be as following:

This Standard consists of two main parts:

PART I. METHODS OF ANALYSIS

SECTION I - METHODS OF ANALYSIS AND METHOD PERFORMANCE CRITERIA BY COMMODITY

SECTION II - PROVISIONS FOR WHICH THERE ARE METHOD PERFORMANCE CRITERIA

SECTION III - COMPLETE DESCRIPTIONS OF METHODS OF ANALYSIS

SECTION IV - METHODS OF ANALYSIS BY COMMODITY CATEGORIES

PART II. METHODS OF SAMPLING BY COMMODITY CATEGORIES AND NAMES

ANNEX. NOTES TO THE STANDARD FOR METHODS OF ANALYSIS AND SAMPLING

5. Add the definitions of Type I, II, III, IV as following:

2. Definitions of Terms

2.1 Codex Methods of Analysis:

Methods for the verification of provisions in CXs, the methods are classified as following:

- **Defining Methods (Type I):** A method which determines a value that can only be arrived at in terms of the method per se and serves as the only method for establishing the accepted value of the item measured. Examples: Howard Mould Count, Reichert-Meissl value, loss on drying, salt in brine by density.
- **Reference Methods (Type II):** 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 (as defined below). It should be recommended for use in cases of dispute and for calibration purposes. Example: Potentiometric method for halides.
- **Alternative Approved Methods (Type III):** A Type III Method is one which meets the criteria required by the Committee on Methods of Analysis and Sampling for methods that may be used for control, inspection or regulatory purposes. Example: Volhard Method or Mohr Method for chlorides.
- **Tentative Methods (Type IV):** A Type IV Method is a method which has been used traditionally or else has been recently introduced but for which the criteria required for acceptance by the Committee on Methods of Analysis and Sampling have not yet been determined. Examples: chlorine by X-ray fluorescence, estimation of synthetic colours in foods.

6. Revision of Part III (Method of Sampling by Categories): to include sampling methods for all food commodities, for example:

- In cereals:

ISO 24333:2009 “Cereals and cereal products- Sampling”

- In milk & milk products:

ISO 5538:2004 “Milk and milk products – Sampling, inspection by attributes”.

NORWAY

Norway appreciate this opportunity to comment on the revision of the Recommended Methods of Analysis and Sampling (CXs 234 - 1999): preamble and structure.

(i) General Comments

We would again like to express our appreciation for the impressive work invested in the revision of CXS 234 by Brazil and Uruguay. Specific comments can be found below.

(ii) Specific Comments

We would like to suggest the following change to page 3: Appendix I: Introduction: Bulletpoint 3:

3. It is recommended that this Standard should be read in conjunction with the related ~~CXSdards~~ **standards**, guidelines and other documents¹.

Rationale: There are no codex standards cited in in the footnote 1, only guidelines, but the ISO 5725 standard is cited, so the word standard is more appropriate.

We would like to suggest the following changes to page 3: Appendix I: Introduction: Footnote 1:

1 Harmonized IUPAC Guidelines for the Use of Recovery Information in Analytical Measurement (CXG 37-2001), Harmonized IUPAC Guidelines for Single-Laboratory Validation of Methods of Analysis (CXG 49-2003), Guidelines on Sampling (CXG 50-2004), Guidelines on Measurement Uncertainty (CXG 54-2004), ~~Protocol for the Design, Conduct and Interpretation of Method Performance Studies (CXG 64-1995)~~, Harmonized Guidelines for Internal Quality Control in Analytical Chemistry Laboratories (CXG 65-1997), protocols for method performance determination through collaborative study. (IUPAC/AOAC **CXG 64-1995** and ISO 5725), **Food Control Laboratory Management: Recommendations (CXG 28-1995)**

Rationale: Remove the reference to IUPAC/AOAC since this reference is unspecified, and replace with the CXG 64-1995 since both ISO 5725 and CXG 64-1995 pertains to method performance studies. Add reference to CXG 28-1995 to complete the list of relevant standards for laboratories.

We suggest the following change to page 5: Part I: Preamble: point 2.1

2.1 Codex Methods of Analysis: methods for the verification of provisions in ~~CXSdards~~ **codex standards (CXs)**.

Rationale: CXSdards may be confusing to some readers, propose to use the official wording with the abbreviation in a parenthesis.

We propose the following change to page 5: Part II: Methods of analysis

All Codex methods, including Type IV methods, can be used for control, inspection and regulation and when parties so agree, for resolution of disputes. ~~A Type I method determines a value that can only be arrived at in terms of the method per se and serves by definition as the only method for establishing the accepted value of the measurand. A Type II method is the one designated Reference Method where Type I methods do not apply. A Type III Method is one which meets the criteria required by the Committee on Methods of Analysis and Sampling and a Type IV is a method which has been used traditionally or else has been recently introduced but for which the criteria required for acceptance by the Committee on Methods of Analysis and Sampling have not yet been determined.~~

Rationale: The different types of methods have already been listed earlier on the same page under point 2.2, with the appropriate reference to the Procedural Manual (PM) where the definitions can be found. By referencing the definitions instead of quoting the definitions future changes in the PM does not necessitate the update of these definitions in CXS 234 also.

We suggest the following correction to page 6, section IV, point e)

e) Type of analytical method

Rationale: The letter d is missing from the word method

PERU

General Comments

Peru acknowledges the work done by Brazil and Uruguay in leading the review of standard CXS 234-1999 Recommended Methods of Analysis and Sampling.

Peru has revised the preamble and the document structure and wishes to point out that the method performance criteria incorporated into the revision will be of great assistance for the users of this Codex standard.

In this regard Peru thinks that the terms of reference of CCMAS39 have been fulfilled and therefore has no general comments.

Specific Comments

Peru has no specific comments in the framework of Codex Alimentarius regarding the request for comments in step 3 of the review of CXS 234-1.

SWITZERLAND

General comment:

In parallel to the revision of the CXS 234 including the methods list by an eWG, the analytical methods to be included in CXS 234 are being updated by another eWG. In our understanding, the work of these two working groups is currently nowhere brought together. We think one common methods list is necessary to ensure that the work of the working groups is consolidated.

Therefore, as part of the revision of CXS 234-1999 preamble and structure, we propose to delete the list of methods (currently contained in Part II section IV of the proposed draft revision) and migrate it to an Excel file (could be placed on forum.codex-alimentarius.net) where the results of the evaluation of each workable package (e.g. wp 1 for Dairy methods) would be reflected in order to facilitate the management and revision of the methods list and to allow a simplified and effective search for methods. Ideally, one body (e.g. the Codex Secretariat) should be responsible for managing the Excel file (in the future the Excel file should be replaced by a database), including the regular (e.g. every 5 years) review of the endorsed analytical methods for inclusion as Codex methods.