

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Items 3.2, 6.2 and 9

MAS44/CRD16 Rev.1

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 THAILAND

### Agenda item 3.2: Endorsement of methods of analysis and sampling plans for provisions in Codex standards - Other relevant matters arising from the amendment of CXS 234-1999

Thailand wishes to express our appreciation for the efforts of the Codex Secretariat for preparing the document for this agenda (CX/MAS 25/44/3-Add.1) for consideration.

Our comments on this matter are as follows.

#### General comments

In principle, we have no objection with methods of analysis and numeric performance criteria as proposed in Appendix I-III.

#### Specific comments

- For Appendix I, Part 2: Method of analysis by description, where specific references to published methods have been provided.

We agree with option 1: *Present the method of analysis by description as an Appendix with an appropriate reference in the commodity table in CXS 234-1999.*

- For Appendix for: Determination of Fish Content (Declaration) in Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter

In order to avoid confusion and provide comprehensive information for the determination of fish content in the mentioned products, all information in Appendix VI of CXS 234 should be written in this Appendix.

### Agenda item 6.2: Review of sampling plans in CXS 234

Thailand is grateful for the efforts of the Electronic Working Group (led by New Zealand and co-chaired by Germany) for preparing the document for "Review of Sampling Plans in CXS 234" (CX/MAS 25/44/9) for consideration.

Our comments on this matter are as follows.

- Discussion paper on the inclusion of sampling plan information in CXS 234-1999 (Appendix I)

#### General comments

1. In principle, we have no objection with "the Discussion Paper: Inclusion of sampling plan information in CXS 234-1999".
2. To be clear, information on sampling plans should be separated from the those on methods of analysis. CXS 234 could be separated into a specific part dedicated solely to the sampling plans. Or, a new standard could be developed to cover only the sampling plan information (in parallel to CXS 234-1999), while the current Part B of CXS 234 is removed.

### Specific comments

#### 1. Proposed format for specification of sampling plan information

To provide comprehensive and necessary information, we have no objection to the proposed five-column format for the specification of sampling plan information, as presented in the following example given in the document.

Commodity	Provision	Physical sampling procedure	Sampling plan details	Notes
Butter	Salt	ISO 707 IDF 50	PRQ = 5%, CRQ = 10%	

2. Regarding para 16, we request clarification on the statement: " It is noted that sampling plans specified in Codex are intended for use by “consumers”, including importing country regulatory agencies and customers, and are not necessarily suitable for use by producers."

In our opinion, clarity on this point is necessary, as the phrase "are not necessarily suitable" leaves room for interpretation.

From our understanding, the development of Codex sampling plans should also support Codex's core objectives—protecting consumer health and ensuring fair practices in food trade. Therefore, we would like to ask whether the Codex sampling plans, even if primarily designed for regulatory inspections, are still considered useful for producers to use as a reference in aligning their own sampling plans for verifying final products before distribution—so as to ensure compliance with Codex commodity standards and customer or regulatory requirements.

3. We would like to request for clarification on the following aspects.

3.1 Clarification for the meaning of “sampling method” and “physical sampling processes”

3.2 Whether "sampling inspection plan" and "sampling plan" are the same?

3.3 Whether a sampling plan for microbiological inspection should be included in the document, since it is also described in CXG 50. If so, whether a specific part for the microbiological sampling plan should be developed?

- Proposal for a discussion paper on sampling plans for bulk materials including mycotoxins (Appendix II)

1. We have no objection to development of a discussion paper on acceptance sampling plans for bulk materials, as proposed by EWG.

2. In this connection, we have no objection to applying a Bayesian approach in developing an acceptance sampling plan for mycotoxins in food and feed. It is necessary that Codex Committee on Contaminants in Food should be advised in this matter.

### **Agenda item 9: Harmonization of names and format for principles identified in CXS 234**

Thailand appreciates the effort of the EWG (led by Brazil and Chile) for preparing the Discussion Paper on “Harmonization of Names and Format for Principles and Provision in CXS 234-1999” (CX/MAS 25/44/12) for consideration.

After thoroughly reviewing the discussion paper, we have some comments regarding this matter, as follows.

1. It is important to emphasize that the harmonization of names and formats for principles and provisions in CXS 234 should be undertaken only as necessary and with careful consideration. As CXS 234-1999 is a single source for methods of analysis in Codex standards, the provisions identified in the CXS 234 should serve as a reference for the harmonization, ensuring consistency while preserving the intended meaning. This approach ensures clarity and consistency of information in both CXS 234 and commodity standards, which will consequently benefit users.
2. If the provisions in CXS 234-1999 are already clear and appropriate (list of provisions in CXS 234 as shown ANNEX D), the harmonization is not needed. And, conditions for specifying provisions are different, harmonization could confuse users. For example, the provision “dietary fibre” contains specific components and is categorized into groups, including low and high molecular weight fractions, as well as soluble and insoluble types. Consequently, the provision suggested in Annex D could cause confusion for users selecting suitable methods of analysis.
3. The definitions proposed in Section 2 of the discussion paper should refer to those defined by internationally recognized organizations.