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 - www.codexalimentarius.org

Agenda Item 3, 4, 5, 6, 7, 8, 9 **MAS/37 CRD/10**

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON METHODS OF ANALYSIS SAMPLING

Thirty-seventh[th] Session
Budapest, Hungary, 22 – 26 February 2016

(comments submitted by Thailand)

Agenda Item 3: Endorsement of Methods of Analysis Provisions and Sampling Plans in Codex Standards (CX/MAS 16/37/3)

General Comments

We agree in principle with the methods of analysis and sampling plan proposed by several Codex Committees in the document**.**

Specific Comments

Our comments on specific sections are as follows:

Committee on Contaminants in Foods (CCCF)

- Appendix I

Sampling Plans for Fumonisins in Maize Grain, Maize Flour and Maize Meal

Sampling Plans for Deoxynivalenol (DON) in cereal-based foods for infants and young children; in flour, meal, semolina and flakes derived from wheat, maize or barley; and in raw cereal grains (wheat, maize and barley) including sampling plans for raw cereal grains

1. For consistency, Table 3: Proposed method criteria for fumonisins and deoxynivalenol (DON) should be amended to comply with each other.

2. Page 6, Table 3: Performance criteria for Fumonisin B1+ B2

Additional column addressing "Minimum applicable range" should be inserted to this table.

3. Page 11, Table 3: Proposed method criteria for DON in cereals

Additional column addressing "RSDR" should be inserted to this table.

Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)

Methods of analysis in the Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (CODEX STAN 72-1981)

In principle, we agree with the endorsement of the proposed methods for nutrients in infant formula as Type II. However, it is proposed to maintain methods previously endorsed, which are specified in CODEX STAN 72-1981 and CODEX STAN 234-1999, as Type III. The previous endorsed methods remained as Type III will be an alternative for Member countries that are not ready to apply recent Type II endorsed methods.

Agenda Item 4: Development of Procedures/Guidelines for Determining Equivalency to Type I Methods (CX/MAS 16/37/4)

We would like to express our appreciations for efforts of the United States of America for preparing the document for Development of Procedures/Guidelines for Determining Equivalency to Type I Methods.

In principle, we agree with the document**.** However, we would like to propose our comments as follows:

1. The procedures for determining equivalency to Type I methods should be included in Guidelines/Guidance for the application of Member countries.

2. The procedures for determining equivalency to Type I methods for quantitative and qualitative methods should be included in a single document. Somehow, the procedure that would have a different format/approach should be described in separated sections of the document.

3. According to the definition of "defining method" (Type I), a value which is determined by the method is the "accepted value". Consequently, when establishing equivalency to Type I, whether a value determined by the equivalent method would be the "accepted value" or "true value". And, considering measurement traceability, where such value can be traced to?

Agenda Item 5: Criteria Approach for Methods which Use a "sum of components" (CX/MAS 16/37/5)

We would like to express our appreciations for efforts of the Electronic Working Group led by the United Kingdom for preparing the document for Criteria Approach for Methods which Use a "sum of components".

In principle, we agree with the document**.** However, our additional comments are as follows:

1. The first bullet: Option A, page 11

The text "Table 3" in a bracket should be amended to "Table 4".

So, this section should read:

- Option A: Select an approved method and convert it into numeric criteria using a hybrid approach **(*Table 4*** ~~Table 3~~**)**

2. The General Criteria for the Selection of Methods of Analysis section of the Procedural Manual should be amended to indicate that the criteria is only suitable for ML value which is single-analyte analyses.

3. We would like to ask for clarifications from CCMAS as described below:

- For the consideration of methods which use a "sum of components, why all the components included within a sum or components are weighted equal, meanwhile a value for precision can be taken from the single analyte analyses.

In addition, consequently, it is recommended that Table 4 which is the potential hybrid approach should be considered for appropriateness.

Agenda Item 6: Criteria for Endorsement of Biological Methods to Detect Chemicals of Concern (CX/MAS 16/37/6)

We would like to express our appreciations for efforts of the Electronic Working Group led by Chile and France for preparing the document for Criteria for Endorsement of Biological Methods to Detect Chemicals of Concern.

In principle, we agree with the document**.** In addition, our comments are as follows:

1. It is recommended that CCMAS should re-evaluate the list of biological methods, as several AOAC methods have been used for a long time and at present, the analysis can be performed by a chemical method that are up- to-date and more efficient.

However, it is concerned that if the re-evaluation is conducted, the biological methods that were previously endorsed as type II could be withdrawn, because currently there is no criteria for endorsement of biological methods, so they could be replaced by chemical methods.

It is recommended to retain the biological methods, as a number of laboratories still apply the biological methods. Changing to chemical methods requires technique, validation process and transitional period. In addition, the application of some chemical methods has high expenses.

2. It is agreed that the electronic working group should continue to work to identify for which classes of the methods the criteria approach applies and develop criteria to endorse each class of biological methods defined

Agenda Item 7: Review and Update of Methods in CODEX STAN 234-1999 (CX/MAS 16/37/7)

We would like to express our appreciations for efforts of the Electronic Working Group led by Brazil and Japan for preparing the document for Review and Update of Methods in CODEX STAN 234-1999.

We agree with the Review and Update of Methods in CODEX STAN 234-1999 as proposed in the document.

Agenda Item 8: Information Document on Practical Examples on the Selection of Appropriate Sampling (CX/MAS 16/37/8)

We would like to express our appreciations for efforts for preparing the document for Information Document on Practical Examples on the Selection of Appropriate Sampling.

We agree with the document in principle**.** However, our specific comments are as follows:

Table 2: Example sampling plans, example: F-FH , page 93

This section should be amended to read:

Example	**Criteria**	**Type of Sampling Plan**	**Sampling and Decision Reference**
F-FH	*Salmonella* in fresh, frozen and cold –smoked fish	Two-class attributes plan	**Consumer and Producer:** ICMSF (1986)a): Chapter 17 SAMPLING PLANS FOR FISH AND SHELLFISH **Sampling:** see Table 27: Sampling plans and recommended microbiological limits for seafoods **Decision:** the lot is accepted if no item out of 5 samples show the presence of *Salmonella* in ~~***1 g***~~ ***25 g*****.** The lot is rejected in the opposite case.

Agenda Item 9: Procedures for Determining Uncertainty of Measurement Results (CX/MAS 16/37/9)

We would like to express our appreciations for efforts for preparing the document for Procedures for Determining Uncertainty of Measurement Results.

In principle, we agree with the document**.** And, from our view, the concepts/procedures for determining uncertainty of measurement results should be in accordance with guides which are internationally recognized**,** for example GUM, VIM and EURACHEM.