CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 4.2, 6 **MAS45/CRD06**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

Forty-fifth Session

Budapest, Hungary

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COMMENTS OF EUROPEAN UNION

Agenda item 4.2: Methods of analysis for protein in quinoa

Mixed Competence
Member States Vote

The European Union and its Member States (EUMS) thank Chile for preparing this document.

ISO 1871 gives general guidance for the determination of protein according to the Kjeldahl principle. It is not a standard operating procedure but offers flexibility with regard to the chemicals used as catalyst, concentration of reagents and specific conditions for sample mineralization, etc.

CRD19 of CCMAS44 describes in fact the outcome of an interlaboratory comparison (ILC) of National Metrology Institutes/Designated Institutes of the Inter-American Metrology System (SIM) for the determination of N in quinoa. Details of the testing conditions and chemicals reagents used are provided as well as the details of the in-house validation of the method using CRMs (either wheat or rye flour). The results of the ILC are given as degrees of equivalence, which is standard practice for key comparisons among NMIs, but does not correspond to the requirements of collaborative study guides for the validation of testing methods of ISO/AOAC/IUPAC. Nevertheless, the ILC data can readily be used to calculate method precision, i.e., repeatability and reproducibility, of ISO 1871 for the determination of protein in quinoa. Still, the question of how to integrate the data in the Codex system remains.

Even if validation data for the determination of protein in quinoa by ISO 1871 is now available, important information on repeatability and reproducibility is still missing; however, this can be estimated with little effort using the data of the ILC.

It remains unclear to the EUMS how to integrate the method details and the method performance characteristics in the Codex system if ISO 1871 would be endorsed as a Type I method. Describing the validated method for the determination of protein in quinoa in an Annex to CXS 234 could be a possibility but is not favoured by the EUMS.

The EUMS would prefer the elaboration of a standard for the determination of protein by the principles described in ISO 1871 by SDOs. Alternatively, the scope of ISO 20483 Cereals and pulses — Determination of the nitrogen content and calculation of the crude protein content — Kjeldahl method could be extended to quinoa provided the validated method for quinoa follows the one outlined in ISO 20483. However, this is outside the remit of CCMAS and up to ISO to decide.

In addition, the EUMS would suggest to re-type the ISO 1871 method currently listed as a Type I for determination of protein in Tehena, as Type IV in CXS 234.

Agenda item 6: Methods of analysis for precautionary allergen labelling

Mixed Competence
Member States Vote

The European Union and its Member States (EUMS) thank the United States and the United Kingdom for preparing this document and would like to submit the following comments.

The proposed response of CCMAS to CCFL47 addresses appropriately the request received from CCFL as it provides a list of suitable analytical methods currently used by Codex Members, which is not intended to be

exhaustive. Methods suggested by Members and meeting the performance and validation criteria published by AOAC and CEN were included in the list. However, only a small number of collaboratively validated allergen testing methods is available yet.

The proposed response clearly stresses several limitations food business operators and method users have to consider when selecting a method for assessing risks of unintended allergen presence (UAP).

The discussion paper also responds to the suggestion to develop method performance criteria for allergen testing, noting that (i) the Procedural Manual explicitly does not foresee performance criteria for ELISA based methods, and (ii) that developing a set of Codex performance criteria in addition to the AOAC and CEN framework duplicates already existing work and can, eventually, create contradictory validation requirements. To avoid such a situation, the AOAC and CEN framework, which was used in the evaluation of the methods, could be formally adopted by reference for Codex purposes, following the examples of certain IUPAC guidelines.

Although not directly requested by CCFL, the proposed response to CCFL should explicitly state that the submitted list is neither a recommendation nor an endorsement of methods. The WG Chairs made remarks to this effect as well (point 12).

The EUMS support the proposed reply to CCFL and suggest that the AOAC and CEN validation and method performance requirements are adopted by reference for Codex purposes.

Furthermore, language should be added to the reply explicitly stating that the submitted list shall not be construed as a recommendation or an endorsement of food allergen testing methods.