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 Items 1, 2, 3.1, 3.2, 4.1, 4.2, 5.1, 5.3, 6, 7.1, 7.2, 8 **MAS45/CRD12**

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

Forty-fifth Session

Budapest, Hungary

9-13 March 2026

COMMENTS OF UGANDA

Uganda appreciates the opportunity to provide comments on the different agenda items to be discussed by the 45th Session of the Codex Committee on the Methods of Analysis and Sampling.

Agenda item 1: Adoption of the agenda

Uganda supports the adoption of the Provisional Agenda items as circulated.

Agenda item 2: Matters referred to the Committee by the Codex Alimentarius Commission and other subsidiary bodies

General Comment: Uganda appreciates the comprehensive work of CAC48, CCEXEC and subsidiary bodies in strengthening the framework for methods of analysis and sampling under CXS 234. Uganda supports harmonised, performance-based, and practically implementable methods that consider the realities of developing country laboratories, including resource constraints, access to reference materials, and technical capacity.

Uganda would like to underscore that, for many competent authorities in the Country, method suitability, cost, equipment availability, and technical complexity are key considerations alongside method performance characteristics.

Uganda proposes that transitions resulting from revocation or correction of methods be managed in a manner that minimizes disruption to National control systems, especially in developing countries. Uganda also supports mentorship and capacity-building initiatives to enable broader Member participation in EWGs.

Specific Comments

In reference to the adoption and amendments to Methods in CXS 234 and Nx Annex

Uganda notes the adoption of additional methods of analysis and performance criteria, Annex on nitrogen-to-protein conversion factors (Nx) and related consequential amendments in regional standards.

Comment: Uganda supports the continued consolidation of Nx factors in a central annex to improve consistency across standards. However, we highlight that in the country, routine protein determination is often still based on total nitrogen methods (e.g., Kjeldahl) without product-specific Nx adjustments.

Uganda therefore encourages CCMAS and FAO/WHO to support capacity building and guidance materials to help laboratories correctly apply updated Nx factors in regulatory and trade contexts.

Revocation of Certain Methods in CXS 234

Uganda notes the revocation of several methods, with the exception of specific entries such as salt saturation in salted fish pending reconsideration.

Comment: Uganda supports the removal of outdated or redundant methods where equivalent or superior internationally validated methods are available. However, before revocation of widely used legacy methods, Uganda requests that CCMAS clearly identifies practical alternative methods, and consider whether those alternatives are accessible to developing country laboratories in terms of equipment and consumables.

Reference: Reactivation of CCMMP – Methods for Camel Milk

Uganda notes the reactivation of CCMMP to develop a standard for pasteurized liquid camel milk.

Comment: Camel milk is of growing economic and nutritional importance. Uganda encourages early consultation with CCMAS to ensure that proposed analytical methods are validated for camel milk matrices.

In reference to handling technical questions from dormant or Correspondence Committees

Uganda notes the challenges identified by CCEXEC regarding standards developed by committees that are no longer active.

Comment: Uganda supports the proposal to make greater use of FAO/WHO expert consultations where no active committee exists.

Uganda stresses that this approach should maintain transparency, and allow adequate opportunity for Member input, including from developing regions, before final recommendations are made.

Codex Strategic Plan 2026–2031 and Timeliness of Documents

Uganda welcomes the monitoring framework and emphasis on timely documentation.

Comment: Uganda supports improved timeliness and concise documents, noting that late circulation of technical documents significantly affects the ability of smaller administrations to consult nationally and regionally. We encourages continued use of EWGs and virtual tools, which have improved participation of national experts.

Development and Updating of Databases

Uganda welcomes prioritization of databases, including for methods of analysis and sampling.

Comment: Uganda strongly supports a user-friendly, searchable database of Codex methods, clearly indicating Method type (I, II, III, IV), scope and matrices and key performance characteristics.

This would significantly assist regulators and laboratories in method selection and harmonization.

Reconsideration of Salt Methods and NPC examples (Reference: Paras 12–13)

Uganda notes the request for CCMAS to reconsider certain salt-related methods and example methods for NPC for salt and sodium.

Comment: Salt and sodium determination are important for nutrition labelling, processed foods, and fish products.

Uganda recommends that CCMAS ensure that example methods for sodium/salt include robust but affordable techniques (e.g., titrimetric or flame photometric methods where suitable).

Guidance should clearly distinguish between reference methods and routine control methods, to support risk-based enforcement in resource-limited settings.

Agenda item 3.1: Methods of analysis and sampling submitted by Codex subsidiary bodies

General Comment

Uganda appreciates the work of the commodity committees and coordinating committees in proposing methods of analysis and sampling plans. Uganda supports science-based, validated, and performance-criteria–driven methods, while emphasizing that practical implement ability in developing country laboratories remains a key consideration for effective Codex implementation.

Uganda encourages CCMAS, where possible, to distinguish clearly between reference (Type I) methods and routine control methods, and ensure that endorsed methods are accessible in terms of equipment, cost, and technical skill.

Specific Comments

1. Salt Saturation Method for Salted Fish (Appendix I, Part A)

Issue: Whether to retain or revoke the salt saturation calculation method and associated sample preparation procedure for salted fish of the Gadidae family.

Position: Uganda supports retention of both the methods and Appendix VIII Part 1 on sample preparation in CXS 234.

Rationale: The method is commodity-specific and directly linked to product characteristics rather than only total salt. In Uganda, traditional and semi-processed salted fish products are common in local and regional trade. The method is calculation-based and does not require advanced instrumentation, making it suitable for regional laboratories.

2. Example Methods for NPC for Salt and Sodium (Appendix I, Part B)

Issue: Whether example methods such as AOAC 971.27 remain appropriate for certain fish and fishery products.

Position: Uganda support review and possible replacement.

Rationale: Some example methods were validated in different matrices (e.g., canned vegetables) and may not be fully suitable for high-protein, high-fat, or fermented fish matrices common in trade.

Uganda laboratories widely use titrimetric (Mohr/Volhard) and potentiometric chloride methods, which are affordable and robust.

Uganda recommends that CCMAS confirm matrix applicability of AOAC 971.27 and similar methods, and ensure at least one simple titrimetric reference method remains listed as an example method for routine control.

3. CCCF: Sampling Plans for Aflatoxins and Ochratoxin A in Spices (Appendix II, Part A)

Position: Uganda supports the proposed sampling plans for nutmeg, dried chilli, and paprika. Spices are both locally consumed and traded commodities. Aflatoxin contamination is a recognized food safety concern in warm and humid climates.

However, Uganda notes the large number of incremental samples (up to 100) may pose logistical challenges for routine border inspection.

Uganda suggests CCMAS clarify that these are reference sampling plans, and that risk-based, reduced sampling frequencies may be applied for routine surveillance in line with Codex guidance.

4. CCCF: NPC for Total Aflatoxins Using "Sum of Components" (Appendix II, Parts B & C)

Position: Uganda supports establishing NPC for total aflatoxins (AFT = B1+B2+G1+G2). However, Uganda requests CCMAS to provide clear reporting guidance:

- Whether compliance should be based on sum of quantified components, even if some are LOQ,
- How to report results when individual aflatoxins have different LOQs.

Clear guidance is essential for harmonized reporting to GEMS/Food and regional monitoring systems.

5. CCASIA Sampling Plans in Regional Standards (Appendix III)

Position: Uganda supports the proposed endorsements**.** Although these are Asia regional standards, Uganda notes that the use of ISO 2859 and ISO 3951 sampling frameworks is consistent with internationally recognized approaches.

6. CCNE: Methods for Maamoul (Appendix IV)

Position: Uganda supports the endorsement of the methods.

Rational: The proposed methods (AOAC and ISO for moisture, water activity, pH, and extraneous matter) are widely used based on established techniques (gravimetry, potentiometry, and water activity meters).

7. CCSCH: Methods for Spices and Culinary Herbs (Appendix V)

a) ISO 927 for Light Seeds and visible mould

Uganda supports endorsement as Type I, as it is a general, internationally accepted method, based on visual and gravimetric principles accessible to regional labs.

b) Turmeric – Colouring Power (ISO 5566)

Uganda supports the clarification of the provision name and continued use of spectrophotometric methods, which are available in many regional laboratories.

c) Chilli/Paprika Pungency – ASTA 21.3 (HPLC)

Uganda supports ASTA 21.3 as a Type I reference method, but notes that HPLC capacity is still limited in some national laboratories.

Uganda recommends that CCMAS clarify that simpler screening or trade methods may be used for routine checks, while ASTA 21.3 remains the reference.

d) Revocation of ISO 3513 (Sensory)

Uganda supports revocation, as instrumental methods provide better reproducibility.

8. Draft Standards: Vanilla, Large Cardamom, Coriander (Appendix V, Part B2)

Uganda supports endorsement of the proposed ISO methods given most are, Gravimetric, Distillation-based and visual examination methods which are appropriate and feasible in developing country contexts.

Agenda item 3.2: Methods submitted by CCFO29

General Comment: Uganda appreciates the work of CCFO29 in advancing validated analytical methods for inclusion in CXS 234-1999 and related standards under the Codex Alimentarius Commission.

Uganda supports endorsement of the proposed methods, including the UV method for gamma oryzanol and GC-FID methods for fatty acid composition and EPA/DHA in microbial omega-3 oils.

Uganda emphasizes the importance of correct method typing (Type I, II, III) in line with the Codex Procedural Manual, particularly for regulatory and dispute resolution purposes. Uganda encourages consistency in the classification of moisture and volatile matter methods to ensure scientific robustness and fitness for purpose.

Agenda item 4.1: Review of methods of analysis in commodity standards (fish and fishery products, fats and oils, cereals, pulses and legumes and derived products)

Uganda appreciates the extensive work of Canada and the EWG in reviewing methods of analysis and aligning commodity standards with CXS 234-1999 as the single reference. Uganda supports the objective of improving consistency, transparency, and global harmonization of Codex methods of analysis.

General Comments

Uganda supports the continued transfer of appropriate methods from commodity standards into CXS 234-1999, provided that methods are fit-for-purpose and internationally validated, method principles and typing (Type I–IV) are clearly indicated and where possible, performance criteria are available to allow the use of equivalent methods.

As a developing country, Uganda emphasizes the importance of flexibility, since not all official control laboratories have access to highly advanced instrumentation. Clear typing allows competent authorities to apply equivalent validated methods while maintaining Codex compliance.

Specific comments on Appendix I

1. Fish and Fishery Products

Uganda supports the inclusion of ISO methods for determination of nitrogen, moisture, fat and ash in fish content calculations for coated fish products.

These methods are:

- Scientifically sound
- Based on well-established analytical principles
- Generally accessible to national reference laboratories in developing countries

Uganda recommends that, where calculations are required (e.g. fish content determination), clear reference to calculation formulas or guidance be maintained to avoid interpretation differences during trade control.

2. Fats and Oils

Uganda supports:

- Replacement of obsolete methods with updated ISO/AOCS methods
- Use of ISO 12966 series for fatty acid composition
- Inclusion of ISO/AOCS methods for peroxide value and soap content

These changes improve scientific validity and harmonization.

However, Uganda notes that full fatty acid profiling using GC-FID may not yet be routinely available in all official laboratories. Uganda therefore stresses the importance of:

- Maintaining appropriate method typing (Type II/III)
- Allowing use of equivalent validated GC methods that meet Codex performance expectations

This flexibility is essential for developing countries implementing Codex standards.

3. Fat Spreads and Blended Spreads (Vitamins A, D, E)

Uganda recognizes the importance of vitamin analysis in fortified foods but notes that HPLC methods remain technically demanding and costly.

Uganda supports the proposed methods provided that:

- They remain Type II or III, allowing validated equivalent HPLC methods
- Clear guidance on sample handling and stability is considered, especially for countries with tropical climates where vitamin degradation may occur.

4. Cereals, Pulses and Legumes

Uganda strongly supports the use of ISO methods for physical and visual grain quality factors, including:

- ISO 7301 for rice grain classification
- ISO 5223 for broken kernels in maize
- ISO 7970 and ISO 7971 for wheat and test weight

These methods are practical, cost-effective and compatible with existing grain inspection systems used in Uganda.

Uganda highlights that visual and sieve-based methods are particularly important for field inspection and decentralized grading systems.

Comments on Appendix iii (Oats and Peanuts)

Uganda notes with concern that no internationally validated methods were identified for several provisions in oats and peanuts.

Peanuts (Groundnuts)

Groundnuts are widely produced and traded in Uganda. Lack of agreed methods for assessing damaged kernels, discolored kernels and broken and split kernels may lead to inconsistent grading and trade disputes.

Uganda recommends:

CCMAS and CCCPL prioritize development of simple visual and sieving-based methods, with clear defect definitions and procedures that can be applied without advanced laboratory infrastructure.

Comments on presentation of Methods (paras 16–17)

Uganda supports improving the usability of CXS 234, especially in view of the planned online database.

Uganda recommends retaining group entries where scientifically appropriate and ensuring the database allows search by individual commodity, even if the method is listed under a broader group. This will help regulators and laboratories quickly identify applicable methods.

Agenda item 4.2: Retyping of ISO 1871 for determining protein in quinoa

Uganda appreciates the comprehensive technical information provided in CX/MAS 26/45/5 and its Appendix concerning the validation and interlaboratory comparison of ISO 1871 for the determination of protein in quinoa.

Uganda recognizes the importance of robust, traceable, and fit-for-purpose analytical methods to support fair trade, nutritional labeling, and regulatory enforcement under Codex standards. While quinoa is not currently a major staple or export commodity for Uganda, its growing relevance in diversification of crops, nutrition-sensitive agriculture, and niche markets warrants interest in ensuring that Codex-recommended methods remain scientifically sound, transparent, and globally applicable.

Uganda further emphasizes that decisions on method classification under Codex should carefully balance scientific rigor, global applicability, and practical implementation capacity, particularly for laboratories in developing countries.

In this regard, Uganda recommends that, should ISO 1871 be reclassified as a Type I method:

- Codex, in collaboration with relevant international bodies, consider capacity-building guidance or implementation notes to support laboratories with varying levels of infrastructure.
- The method description in CXS 234-1999 clearly reflects acceptable ranges of reagents, catalysts, and operating conditions to avoid unnecessary technical barriers to trade.

Agenda item 5.1: Fruit juices workable package

Uganda thanks IFU and the expert group for the comprehensive review presented in document CX/MAS 26/45/6

Uganda recognizes that internationally validated, fit-for-purpose analytical methods are essential to protect consumers, facilitate fair trade, and support effective enforcement by competent authorities, in line with the mandate of the Codex Committee on Methods of Analysis and Sampling.

Editorial Comment: Further Uganda observes the editorial changes in Appendix 1 pg. 5, on the fourth column named “Principle” and fifth row, replace the word “Magnetic Resonance spectrometry (D NMR)” with “Nuclear Magnetic Resonance (D NMR) for clarity”

Revocation of Obsolete or Unsupported Methods

Position: Uganda supports the revocation of methods that are obsolete, lack adequate validation, or are no longer supported by their respective Standards Development Organizations (SDOs). However, revocation should proceed only after confirmation that suitable, validated alternative methods are available and after allowing an appropriate transition period for national laboratories that continue to rely on such methods.

Justification: This approach safeguards regulatory continuity and enforcement capacity, particularly in developing countries, while ensuring progressive alignment with current scientific practice.

Retention and Transfer of Fit-for-Purpose Methods

Position: Uganda supports the retention and transfer of the 52 methods identified as fit-for-purpose, especially those critical for authenticity verification. These include IRMS-based stable isotope methods, HPLC-based sugar profiling, organic acid profiling, and mineral analysis methods.

Justification: These methods remain essential to detect adulteration, undeclared additives, and misrepresentation of juice origin or composition. Their continued inclusion reflects the ongoing relevance of the original inclusion logic applied in 2005 for authenticity testing and supports consumer protection and fair trade.

Enzymatic Methods and Proprietary Kits

Position: Uganda notes concerns regarding enzymatic methods linked to proprietary kits, including variability in performance and lack of demonstrated equivalence across different kits. Uganda supports postponement of final decisions on these methods to CCMAS46 to allow further technical evaluation and consideration of non-proprietary reference alternatives.

Justification: Temporary retention of these methods is necessary to avoid regulatory gaps and safeguard enforcement capacity in situations where validated non-proprietary or HPLC-based alternatives are not yet available or widely accessible, particularly in developing-country laboratories.

ISO Methods

Position: Uganda notes that ISO methods were not fully assessed due to limited access to documentation. Before any revocation, ISO should be formally consulted, and CCMAS should evaluate the global use, technical relevance, and regulatory reliance on these methods.

Justification: This will help prevent unintended regulatory gaps and ensure that decisions are based on a comprehensive understanding of international practice.

Consolidation and Method Classification

Position: Uganda supports consolidation of duplicate methods where procedures are technically equivalent and supports clearer differentiation between Type II and Type III methods where procedural differences exist.

Justification: This will enhance analytical clarity, consistency, and usability for enforcement laboratories, while maintaining transparency regarding method performance and applicability

Agenda item 5.3: Sugars and honey workable package

Uganda thanks Uruguay and the EWG for the extensive and technical work undertaken to review and update methods for honey and sugars. Uganda supports the overall objective of ensuring methods in CXS 234 are fit-for-purpose, scientifically sound, and practically applicable.

1. General Position

Uganda supports endorsement of the EWG recommendations in Appendix I, as they improve clarity, update outdated references, and align methods with current scientific practice. However, Uganda stresses that method selection must balance analytical performance with global accessibility, especially for countries with limited

advanced instrumentation.

2. Sugars Added / Honey Authenticity

Uganda supports replacing AOAC 991.41 with AOAC 998.12 for detection of added sugars in honey and the inclusion of CEN EN 17958 (LC-IRMS) as a supportive/alternative method.

These methods strengthen authenticity control, which is important for Uganda as a honey-producing and exporting country. However Uganda emphasizes:

- Stable isotope methods (IRMS) are high-cost and not widely available in developing countries
- They should remain Type II/III or IV, not the sole reference method
- Countries should be allowed to use validated sugar profile methods (e.g., HPLC-based) where appropriate screening is needed before confirmatory testing.

3. Diastase Activity

Uganda supports retaining AOAC 958.09 as the Type I reference method, as it is widely known and more accessible. Uganda supports inclusion of IHC 6.1 as an alternative method where validation data exist. This dual approach supports both method continuity and scientific advancement.

4. Sample Preparation

Uganda supports listing **AOAC 920.180** as a **complementary sample preparation method**, since proper sample prep is critical for reliable honey analysis.

5. Invert Sugar vs. Reducing Sugars

Uganda recognizes the technical concern that traditional Type I methods measure reducing sugars expressed as invert sugar, not strictly glucose + fructose.

Uganda supports:

- Gradual transition toward more specific invert sugar methods (e.g., enzymatic or chromatographic)
- Retention of traditional titrimetric methods as Type IV alternatives during the transition period

This approach avoids disrupting laboratories that still rely on classical methods while moving toward improved specificity.

6. Sulphur Dioxide in Sugars (Major Issue)

Uganda notes the EWG concern that several existing ICUMSA and older Monier-Williams methods may not meet Codex performance criteria at low SO_2 levels. Uganda supports consideration of the Optimised Monier-Williams method (AOAC 990.28) where performance is demonstrated and inclusion of the US FDA LC-MS/MS method as a Type IV “recently introduced” method for high-sensitivity needs

However, Uganda stresses:

- LC-MS/MS is not widely available in many developing country control laboratories
- It should not become the only enforcement method
- Classical or enzymatic methods that meet Codex performance criteria should remain acceptable

Uganda therefore supports a tiered approach:

1. Reference/high-sensitivity methods (e.g., LC-MS/MS)
2. Validated routine methods suitable for regulatory monitoring in developing countries

This ensures food safety while maintaining fair trade.

7. Conductivity Ash, Polarization, Colour and Other ICUMSA Methods

Uganda supports retention of **ICUMSA official and accepted methods** for Conductivity ash, Polarization, Colour and Loss on drying

These are well established in sugar laboratories globally and remain fit for purpose.

8. Methods Not Yet Included

Uganda notes that methods for, Sugar content (honey), Electrical conductivity, Starch content will not be included at this stage. Uganda agrees and supports further technical work before endorsement.

9. Future Work / EWG

Uganda supports re-establishment of the EWG to:

- Clarify method applicability across different sugar commodity classifications
- Provide clear guidance on filtration steps where anticaking agents are present
- Continue reviewing methods that were not accessible or lacked data

Uganda encourages broader participation from developing countries and regional laboratories in the next phase.

Agenda item 6: Methods of analysis for precautionary allergen labelling

Uganda thanks the EWG led by the United States and the United Kingdom for the extensive work presented in document CX/MAS 26/45/9

Uganda recognizes the importance of reliable and fit-for-purpose analytical methods to support precautionary allergen labelling and protect allergic consumers. We note the careful emphasis placed on method validation, matrix effects, and the limitations of proprietary ELISA-based methods.

From Uganda's perspective, it is important that Codex guidance remains practical and inclusive, taking into account laboratory capacity constraints and access to analytical methods in developing countries. We therefore support the approach of providing methods for information rather than endorsement, and the clear caveats on fitness-for-purpose.

Reference Frameworks for Method Evaluation

Uganda supports the use of AOAC Appendix M and relevant EN standards (including EN 17855, EN 17644, EN 17254, and EN 15634) as reference frameworks for evaluating method validation and performance. While these guidelines are not Codex-endorsed, Uganda recognizes them as internationally accepted benchmarks that enhance transparency, comparability, and assessment of fitness-for-purpose of allergen analytical methods, which is particularly important for competent authorities and laboratories in the region.

Presentation and Categorization of Methods

Uganda supports the presentation of methods in two informative tables:

Table 1: Methods supported by published multi-laboratory validation studies or performance-tested status; and

Table 2: Methods currently available but validated at manufacturer, single-laboratory, or in-house level.

This clear distinction improves understanding for CCFL, competent authorities, and trading partners regarding the level of validation rigor, without implying equivalence, superiority, or endorsement of any listed method.

Fitness-for-Purpose, Action Levels, and Technical Limitations

Uganda strongly supports the explicit statement that an analytical method is suitable for PAL risk assessment only when demonstrated to be fit for purpose for the specific allergen, action level (AL), reference amount (RfA), and food matrix, and when its analytical range spans the relevant action levels established through FAO/WHO expert consultations. Uganda further supports the inclusion of detailed technical caveats on limitations of ELISA and LC-MS/MS methods, including selectivity and sensitivity considerations, sample preparation challenges, matrix and processing effects (such as heat treatment and fermentation), reduced detectability due to protein denaturation, and variability in performance among ELISA kits. These considerations are critical for ensuring reliable interpretation of results, particularly for processed foods widely traded in international and regional markets.

Reporting Units, Proprietary Methods, and Trade Considerations

Uganda supports the recommendation that analytical results, where feasible, be reported as mg total protein from the allergenic source per kg of food, with the application of scientifically valid conversion factors where required. Harmonized reporting is essential to avoid misinterpretation of compliance relative to action levels and to support risk-based decision-making. Consistent with Codex principles, Uganda further supports explicit reference to the provision that proprietary methods should not be endorsed where suitable non-proprietary methods exist, and that emphasis should be placed on method performance criteria rather than branded solutions. This approach is particularly important for developing countries, where limited access to proprietary kits and potential disruptions in global supply chains may otherwise pose barriers to effective allergen monitoring and trade.

Future Work and Forwarding to CCFL

Uganda supports forwarding the draft CCMAS response to CCFL, including Appendix I and the two informative tables of methods, as a sound scientific basis for precautionary allergen labelling that enhances consumer protection and reduces misleading or inconsistent allergen declarations. While recognizing that development

of numeric or method performance criteria (MPC) lies outside the current EWG's terms of reference, Uganda supports CCMAS informing CCFL that such work could be considered in the future, should CCFL request it. MPC structured by allergen, matrix, and action level could provide a technology-neutral framework for future Codex work, considering that, to date, only a limited number of analytical techniques have been evaluated and that additional validation data across products and matrices remain necessary.

Agenda item 7.1: Review of sampling plans in CXS 234-1999

Uganda thanks the EWG led by New Zealand and Germany for the comprehensive review of sampling plans in CXS 234-1999.

1. Preferred Approach for Placement of Sampling Plans

Uganda supports Option 1, namely the inclusion of all endorsed sampling plan information within CXS 234-1999 as the single Codex reference for sampling plans. Uganda considers that this approach aligns with the established role of CXS 234 as the authoritative repository for endorsed methods of analysis and sampling, and supports harmonization, transparency, and consistent application across commodities and Members.

Uganda acknowledges Option 4 (development of separate standards containing sampling plans for specific commodity groups) as a possible complementary approach for future consideration, provided that strong linkage to a central repository under CXS 234 is maintained to avoid fragmentation, duplication, and inconsistent interpretation of Codex texts.

Justification:
A single, authoritative reference improves usability, reduces interpretative errors, and ensures coherent application of sampling and testing requirements, particularly for regulators and laboratories with limited technical capacity.

2. Database and Format Considerations

Uganda supports transitioning CXS 234 from its current static format to an electronic, searchable database or Excel-based tool, integrating endorsed sampling plans alongside analytical methods. Uganda supports further work to:

- Define a clear and standardized structure for the database.
- Ensure functionality for creation, editing, and transparent display of sampling plan entries; and
- Standardize presentation of sampling information (e.g. sampling plan type, physical sampling procedures, parameters, and decision criteria) in alignment with relevant Codex guidance, including CXG 50 (General Guidelines on Sampling).

Justification:
A searchable electronic repository enhances coherence, accessibility, and ease of use, particularly for competent authorities and laboratories in developing countries, and supports consistent implementation of Codex sampling principles.

3. Role of CCMAS in Supporting Development of Sampling Plans

Uganda notes that several Codex commodity committees have limited capacity or are adjourned *sine die*, constraining their ability to develop statistically robust sampling plans. Uganda therefore supports a strengthened advisory and coordinating role for CCMAS, including:

- Providing technical guidance on sampling plan design and statistical parameters.
- Supporting capacity-building and training activities; and
- Clarifying expectations for key sampling parameters, including producer's and consumer's risks, consistent with Codex principles.

Justification:

Scientifically sound sampling plans are essential to ensure reliable compliance decisions. Centralized technical support from CCMAS promotes consistency, scientific robustness, and fair application across commodities and regions.

4. Establishment of a New Electronic Working Group

Uganda agrees that a new EWG should be established to continue technical development of the sampling plan framework, including:

- Refining the content and presentation of sampling plan information.

- Integrating existing sampling information from CXS 234; and
- Defining governance arrangements for maintenance and updating of the system.

Justification:
Continued structured technical work is necessary to operationalize the agreed approach and ensure sustainable, coherent implementation by all Members.

Agenda item 7.2: Sampling plans for bulk materials/heterogenous lots including mycotoxins

Uganda thanks the EWG led by New Zealand and Germany for the well-developed discussion paper on sampling plans for bulk and heterogeneous lots, including mycotoxins.

Uganda supports initiating new work to develop general guidance, preferably as an annex to CXG 50, to address the limitations of existing sampling plans for inhomogeneous lots.

Given the importance of commodities such as maize, groundnuts, and sorghum to Uganda's food security and trade, improved guidance that better captures mycotoxin risks in bulk consignments is essential.

Uganda emphasizes the need for close collaboration with the Codex Committee on Contaminants in Food (CCCF) and for practical, implementable guidance that considers the capacity constraints of developing countries.

Specific Comment

1. Need for New Codex Guidance

Uganda supports the initiation of new work to develop general guidance on acceptance sampling plans for bulk materials and heterogeneous lots, noting that current approaches referenced in CXS 193-1995 have limitations in effectively addressing highly inhomogeneous contamination patterns characteristic of mycotoxins.

Uganda agrees that the proposed guidance should be developed as an annex to CXG 50-2004 (General Guidelines on Sampling), to complement existing Codex sampling principles while providing practical, commodity-neutral guidance applicable across multiple contaminants and food matrices.

Justification:
Mycotoxins are unevenly distributed within bulk consignments, and statistically inadequate sampling plans may lead to significant misclassification of lots, undermining consumer protection and fair trade. Scientifically sound acceptance sampling guidance, aligned with risk-based principles, is therefore essential to strengthen national food control systems and ensure reliable compliance assessment.

Agenda item 8: Harmonization of names and format for principles identified in CXS 234

Uganda thanks the EWG led by Brazil and Chile for the comprehensive work on harmonizing names and formats for principles and provisions in CXS 234.

Uganda supports the harmonization of terminology and definitions, as this will improve clarity, consistency, and usability of CXS 234, particularly for laboratories and regulators in developing countries.

Uganda emphasizes that changes to provisions should be undertaken cautiously and in close consultation with the relevant Codex commodity committees, especially where technical or regulatory implications may arise.

Editorial Comment: Uganda observe the editorial changes on the Annex 1, Principle 19.1, of method of Analysis, recommends to consider a slight change in acronym of Electron Capture Detector to be (ECD) instead of (EC) for clarity

Harmonization of Names and Definitions (Appendix I; Annexes A, B, and C)

Uganda supports the proposed consolidated structure and harmonized terminology for principles of methods of analysis, including:

- A clear definition of the term *"principle"* as the analytical technique used to determine the result of a provision;
- Alignment of definitions with internationally recognized references (e.g. IUPAC, VIM, GUM, ISO); and
- Improved clarity of analytical technique descriptions to avoid ambiguity, duplication, or overlap.

Uganda supports replacement of ambiguous or outdated terminology, including replacing *"ashing"* with *"incineration"*, and supports the revised wording for analytical techniques such as *chromatography* and *potentiometry*. Uganda further supports refinement of generic terms (e.g. replacing *"calculation"* with *"calculated method-principle"*) to improve scientific precision and consistency.

To ensure transparency and technical robustness, Uganda recommends that appropriate references be provided for newly introduced or revised definitions.

Justification: Harmonized, clearly defined terminology aligned with international metrological references improves scientific accuracy, regulatory interpretation, and consistent application of methods across regions.

Scope of Method Principles (Annex A)

Uganda notes differing views on the inclusion of method principles not currently referenced in CXS 234-1999. Uganda considers that:

- Retention of such principles may be acceptable on an interim basis to provide a harmonized framework that supports future method endorsement.
- However, long-term inclusion of new principles should remain strictly linked to the endorsement of new methods, in accordance with established Codex procedures and mandates.

Clear guidance from CCMAS is therefore required to determine whether such principles should be retained or removed at this stage.

Justification: This approach maintains procedural integrity of Codex while allowing flexibility for future scientific developments without prejudging endorsement outcomes.

Criteria Used and Presentation of Method Principles

Uganda supports clarification of criteria for assays whose results are method-dependent, including improved wording to emphasize predominant analytical parameters influencing results. Uganda further supports removal of secondary procedural details from method principles unless such information is essential to result determination.

Justification: Concise, technically focused principles enhance harmonization, prevent misinterpretation, and ensure that method principles remain fit for purpose.

Harmonization of Provisions (Annex D)

Uganda acknowledges the significant technical complexity involved in harmonizing provisions across commodity standards and CXS 234-1999 and therefore:

- Supports the proposed classification approach (editorial/no-change provisions; provisions linked to active committees; provisions linked to inactive committees) as a practical and transparent framework for further work;
- Agrees that the examples presented in Annex D are useful for illustration but should not prejudge final decisions; and
- Emphasizes that any substantive changes to provisions should be undertaken cautiously and in consultation with the relevant Codex commodity committees, in line with Codex procedures.

Uganda supports publishing the revised principles and definitions as an information document and looks forward to continued, stepwise work on harmonization of remaining provisions.

Justification: A structured, consultative approach prevents unintended regulatory impacts, preserves committee mandates, and supports consistent global implementation.