

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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

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COMMENTS OF BURUNDI

Agenda item 1: Adoption of the agenda

General Comment: Burundi appreciates the opportunity to provide comments on the different agenda items to be discussed by the 45th Session of the Codex Committee on Methods of Analysis and Sampling and Burundi proposes the adoption of the provisional agenda as given.

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

General Comment: Burundi welcomes the information provided by the Codex Alimentarius Commission (CAC48) and CCEXEC on adopted, amended, and revoked methods, as well as strategic and procedural matters. Burundi supports efforts to improve document timeliness, strengthen leadership in electronic working groups, and ensure timely scientific advice to underpin Codex standards. Burundi further supports prioritization of databases on methods of analysis and sampling, as these are critical for harmonized implementation and regulatory decision-making. Burundi 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. Burundi also supports mentorship and capacity-building initiatives to enable broader Member participation in EWGs.

Technical Comments

1. Corrections and further amendments to methods in CXS 234-1999: Burundi notes the adoption of corrections to methods for quick frozen fish products and supports CCMAS consideration of further amendments under Agenda Item 3. Burundi proposes that any additional changes be accompanied by clear technical justification and implementation guidance to facilitate uptake by national laboratories and inspection services.
2. Nitrogen-to-protein conversion factors (Nx): Burundi takes note of the adoption of the Annex on Nx factors and the deletion of wheat protein products from the wheat flour entry. Burundi supports continued work to address remaining inconsistencies, including those for soy products, to ensure scientific coherence and consistent application across commodities.
3. Development of a standard for pasteurized liquid camel milk: Burundi welcomes the rBurundtivation of CCMMP and supports early consultation with CCMAS on suitable methods of analysis. Camel milk is of growing importance in arid and semi-arid regions, and appropriate, validated methods especially on amino acid profiling of camel milk are necessary to support food quality parameter provisions to facilitate trade.
4. Handling of standards from committees working by correspondence or adjourned sine die: Burundi supports CCEXEC proposals for interim solutions, including consultations with FAO/WHO expert bodies. Burundi notes the need for a clear, predictable mechanism to address technical questions to avoid regulatory gaps or delays in method endorsement. Burundi stresses that this approach should maintain transparency, and allow adequate opportunity for Member input, including from developing regions, before final recommendations are made.
5. Scientific advice and data submission: Burundi supports calls for innovative approaches to scientific advice and encourages mechanisms that facilitate submission of data from developing countries,

including use of regional data and capacity-building support.

Burundi 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

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

General Comments: Burundi supports the work of the Codex Committee on Methods of Analysis and Sampling (CCMAS) in harmonizing analytical methods and sampling plans to underpin Codex standards. Burundi welcomes the structured presentation of methods and NPC referred by the Codex Alimentarius Commission (CAC48) and subsidiary committees. Burundi notes that the endorsed methods should be scientifically robust, fit for purpose and realistically implementable by official control laboratories, particularly in developing countries. Burundi further supports alignment between CXS 234-1999 and commodity standards to avoid duplication, ambiguity, or enforcement challenges.

Specific Comments

1. Retention of the method for salt saturation in salted and dried salted fish (Gadidae family)

Burundi supports retention of both the methods and Appendix VIII Part 1 on sample preparation in CXS 234 as agreed by CAC48.

2. Review of example methods for numeric performance criteria (NPC) for salt and sodium

Comment: Burundi supports the CCMAS review of listed example methods and possible replacement.

Justification: The method is commodity-specific and directly linked to product characteristics rather than only total salt. In Burundi, 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.

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.

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

Burundi therefore recommends that CCMAS confirms matrix applicability of AOAC 971.27 and similar methods and ensure at least simple titrimetric reference method remains listed as an example method for routine control.

3. Sampling plans and NPC for total aflatoxins and ochratoxin A in Spices (Appendix II, Part A)

Comment: Burundi supports endorsement of the proposed sampling plans for nutmeg, dried chilli, and paprika and the associated NPC, noting that they are risk-based, statistically robust, and consistent with Codex principles. These measures are critical for effective control of mycotoxins in spices of relevance to international trade and public health. Since spices are both locally consumed and traded commodities. Aflatoxin contamination is a recognized food safety concern in warm and humid climates.

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

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

4. NPC for total aflatoxins using the “sum of components” approach (Appendix II, Parts B & C).

Comment: Burundi supports endorsement for total aflatoxin (AFT = B1+B2+G1+G2) using sum of components however with clear guidance on the reporting.

Justification: The sum-of-components approach aligns with modern multi-analyte methods. However, without clear guidance on reporting rules (e.g. treatment of results below LOQ), laboratories may produce inconsistent data. Clear instructions are necessary to ensure comparability of results across countries and data platforms.

Specific Comment: Burundi noted that the precision in Appendix II Part B, was set at $\leq 44\%$ while that in Appendix II Part C, the precision has been proposed as $< 44\%$. BURUND recommends setting the precision at $\leq 44\%$ in Appendix II Part C.

Justification: This will ensure harmonization of the requirements. Precision is a limit of what is allowed (repeatability/reproducibility) as a performance criterion and not a target.

5. Methods of analysis for spices and culinary herbs (CCSCH) (Appendix III)

Comment: Burundi supports endorsement of ISO 927, ASTA 21.3, revised curcuminoid nomenclature, and revocation of ISO 3513.

Justification: Instrumental methods provide greater objectivity, reproducibility, and precision than sensory methods. Replacing ISO 3513 with ASTA 21.3 improves analytical reliability for pungency determination, while harmonized terminology for curcuminoids reduces ambiguity in interpretation and reporting.

6. CCNE: Methods for Maamoul (Appendix IV)

Comment: Burundi supports the endorsement of the methods for Maamoul.

Justification: 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

Burundi 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)

Burundi 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)

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

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

d. Revocation of ISO 3513 (Sensory)

Burundi supports revocation, as instrumental methods provide better reproducibility.

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

Burundi supports endorsement of the proposed ISO methods given that 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: Burundi appreciates the work of CCFO29 in advancing validated analytical methods for inclusion in CXS 234-1999 and related standards under the Codex Alimentarius Commission. Burundi:

1. 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.
2. 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.
3. 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)

General Comments

1. Burundi appreciates the work of the Electronic Working Group (EWG), chaired by Canada, in reviewing methods of analysis contained in selected Codex commodity standards with a view to ensuring consistency with the Recommended Methods of Analysis and Sampling (CXS 234-1999) as the single reference for Codex analytical methods.
2. Burundi supports the overall Codex approach of consolidating fit-for-purpose, internationally validated methods under CXS 234-1999, as this enhances regulatory clarity, promotes harmonised implementation, and facilitates fair trade, particularly for developing countries relying on Codex methods for official food control.
3. Burundi notes that the commodities under review: cereals, pulses and legumes, fats and oils, and fish

and fishery products; are of high importance to national food security, public health protection, and domestic and export trade. Harmonised and practicable analytical methods are therefore critical to Burundi's food control system.

4. Burundi notes the importance of ensuring that endorsed methods are not only scientifically robust but also implementable within national laboratory capacities, including public laboratories operating under ISO/IEC 17025 accreditation.

Specific Comments

a) Amendments and Revocations to CXS 234-1999 (Appendix I, Part 1)

Burundi supports the endorsement of the proposed amendments and revocations to CXS 234-1999 as recommended by the EWG, including the removal of obsolete or withdrawn ISO, BS, and AOAC methods and their replacement with updated internationally validated methods.

Burundi supports the proposed corrections to commodity titles and provision names to ensure consistency with the corresponding Codex commodity standards and to improve clarity regarding method applicability.

b) Fish and Fishery Products

Burundi supports the proposed methods for the determination of moisture, crude protein, drained weight, and fish content (nitrogen, moisture, fat, ash) in fish and fishery products, including the continued use of ISO and AOAC methods already endorsed at previous CCMAS sessions.

These methods are relevant to Burundi's expanding fish and fishery sector and support both consumer protection and export certification requirements.

c) Fats and Oils

Burundi supports the replacement of superseded methods for soap content, fatty acid composition, and peroxide value with updated ISO 12966 series and AOCS methods, as proposed.

Burundi agrees with the revocation of withdrawn ISO standards and obsolete British Standards and supports alignment of methods for named vegetable oils, named animal fats, and blended spreads with current international best practice.

These changes are important for enforcement against adulteration, verification of labelling claims, and quality control in both imported and locally produced edible oils.

Burundi recommends additional of other method which ISO 19662 Milk, Determination of fat content Acido-butyrometric (Gerber method) on the provision of milk fat content, not all the laboratories use GC, alternative method provides flexibility for laboratories to select the most suitable method based on available resources

However, Burundi notes that full fatty acid profiling using GC-FID may not yet be routinely available in all official laboratories.

d) Cereals, Pulses, Legumes and Derived Products

Burundi supports the endorsement of visual, gravimetric, and sieving methods (including ISO 7301, ISO 5223, ISO 7970, ISO 7971, and relevant ICC methods) for maize, rice, wheat, durum wheat, and sorghum. These commodities are staple foods in Burundi, and the proposed methods are already widely applied in national inspection, grading, and compliance verification activities.

e) Insect-Bored Kernels (Wheat and Durum Wheat)

Burundi supports further consideration of the EWG proposal to align the provision on "insect-bored kernels" with the broader category of "grain attacked by pests," subject to clarification by the relevant commodity committee.

Burundi notes that, in practical inspection settings, differentiation between insect-bored kernels and other pest-damaged grains may be challenging, and harmonisation could improve inspection efficiency while maintaining food safety outcomes.

f) Oats and Peanuts – Provisions "To Be Developed / To Be Determined" (Appendix III)

Burundi notes with concern that no internationally validated methods were identified for several defect and quality provisions in oats (CXS 201-1995) and peanuts (CXS 200-1995).

Burundi recommends referring Method of EAS 901, principle gravimetric, Type I for the commodity of Oats, furthermore, recommend addition of method of ISO 605, Principle Gravimetric, Type I for the commodity of Peanuts to address method listed under Appendix III since Proposed method is Validated and used by Burundi.

Burundi encourages CCMAS, in collaboration with the relevant commodity committee and Standard Development Organizations, to prioritise the development of internationally validated methods for peanuts, given their high food safety risk profile, including susceptibility to aflatoxin contamination.

Burundi considers that the absence of Codex-endorsed methods for these provisions may weaken enforcement capacity and create challenges in trade and regulatory decision-making.

3. Presentation of Methods in CXS 234-1999

Burundi supports further consideration of the EWG suggestion to present methods of analysis on a commodity-specific basis within a future online database for CXS 234-1999, if clarity on method typing and applicability is maintained.

Burundi considers that improved online presentation and searchability of methods would enhance usability for regulators and laboratories, particularly in developing country contexts.

Burundi supports the objective of improving consistency, transparency, and global harmonization of Codex methods of analysis.

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

General Comment: Burundi recognizes the importance of robust, traceable, and fit-for-purpose analytical methods to support fair trade, nutrition labelling, and regulatory enforcement under Codex standards. In this context, the Burundi supports continued updating of Recommended Methods of Analysis and Sampling to ensure scientific soundness, transparency, and global applicability, in line with the mandate of the Codex Committee on Methods of Analysis and Sampling.

Re-typing of ISO 1871

Position: Burundi supports the proposal that CCMAS45 agree to re-type ISO 1871 for the determination of protein in quinoa as a Type I method in CXS 234-1999 and request the Codex Secretariat to update the relevant Codex texts accordingly.

Justification: ISO 1871 is an internationally recognized, well-established method with demonstrated robustness and traceability. Its classification as a Type I method will strengthen harmonization, ensure regulatory confidence, and support consistent enforcement and nutrition labelling across Members.

Agenda item 5.1: Fruit juices workable package

General Comment: Burundi appreciate the review of analytical methods for fruit and vegetable juices undertaken under the auspices of the International Fruit and Vegetable Juice Association (IFU). The Burundi 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 Burundi observe 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: Burundi 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: Burundi 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: Burundi notes concerns regarding enzymatic methods linked to proprietary kits, including variability

in performance and lack of demonstrated equivalence across different kits. Burundi 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: Burundi 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: Burundi 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

General Comment: Burundi appreciates the work of the Electronic Working Group (EWG) chaired by Uruguay on the structured cross-review of honey and sugar standards, including CXS 12-1981 and CXS 212-1999, against CXS 234-1999. Burundi supports consolidation of identical or equivalent sugar commodity methods, clarification of method applicability, and re-establishment of the EWG to resolve outstanding technical issues, notably sulphur dioxide and invert sugar determinations. Burundi emphasizes that transitions to newer methods should account for laboratory capacity in developing countries and that Type I methods must remain practical, enforceable, and globally accessible, consistent with the mandate of the Codex Committee on Methods of Analysis and Sampling.

Honey

Diastase Activity

Position: Burundi supports to retain AOAC 958.09 as the Type I reference method and include IHC 6.1 as a Type IV alternative where validation data are available. Dual Type I/IV designation should remain exceptional.

Justification: AOAC 958.09 ensures continuity, reproducibility, and routine enforceability in regulatory laboratories. Inclusion of IHC 6.1 provides a scientifically validated alternative without compromising regulatory practicality, supporting both method continuity and scientific advancement.

Hydroxymethylfurfural

Position: Burundi proposes the additional of new method, DIN 10751-3 into the provision of Hydroxymethylfurfural under Honey commodity in Appendix 1

Justification: The method provides flexibility for laboratories to select the most suitable method based on available resources

Added Sugars / Honey Authenticity

Position: Burundi supports to replace AOAC 978.17 with AOAC 998.12; revoke AOAC 991.41; and list LC-IRMS (CEN EN 17958) as a supportive Type IV method pending broader validation and accessibility.

Justification: AOAC 998.12 is robust and widely accessible for regulatory control. LC-IRMS provides high scientific value for authenticity verification but is limited by cost and instrumentation availability in developing countries; therefore, it should not be the sole enforcement method. Validated sugar-profile methods (e.g., HPLC-based) may be used for screening prior to confirmatory testing.

Sample Preparation

Position: Burundi supports to include AOAC 920.180 as a complementary sample preparation method.

Justification: Standardized and appropriate sample preparation underpins reproducibility and analytical consistency across laboratories.

Sugars

Invert Sugar vs. Reducing Sugars

Position: Burundi supports to retain established Type I titrimetric methods (e.g., ICUMSA GS1-5) while including enzymatic or chromatographic methods as Type IV alternatives. Any transition toward specific invert sugar determination should be gradual and further evaluated.

Justification: Type I methods ensure regulatory continuity and broad accessibility, while Type IV alternatives allow higher specificity where laboratory capacity permits, avoiding disruption during transition.

Sulphur Dioxide (SO₂)

Position: Burundi supports to retain AOAC 962.16 for limits above 50 mg/kg; consider Optimised Monier-Williams (AOAC 990.28) where performance is demonstrated; and include LC-MS/MS as a Type IV “recently introduced” method for high-sensitivity needs. A tiered approach should be maintained.

Justification: While advanced methods enhance sensitivity, they are not universally available. A tiered framework (1) high-sensitivity reference methods and (2) validated routine methods suitable for developing-country laboratories, ensures food safety, enforceability, and fair trade.

Lactose / Reducing Sugars

Burundi Position: clarify applicability of ICUMSA GS4-3 and consider HPLC methods where higher specificity is required. Any revisions should not alter established limits unless scientifically justified.

Justification: This preserves analytical accuracy while maintaining regulatory consistency.

Polarization / Filtration

Burundi Position: Clarify procedures for removal of anticaking agents during filtration and adopt updated ICUMSA GS1-1 (2022) once fully implemented.

Justification: Ensures reliable polarization measurements and alignment with current international practice.

Other ICUMSA Methods

Position: Burundi supports to retain official and accepted ICUMSA methods for conductivity ash, polarization, colour, and loss on drying.

Justification: These methods are well established, globally applied, and remain fit for purpose.

Methods Not Yet Included

Position: Burundi agrees that methods for sugar content (honey), electrical conductivity, and starch content should not be included at this stage.

Justification: Additional technical work and validation data are required prior to endorsement.

Future Work and EWG

Position: Burundi support re-establishment of the EWG to address remaining technical issues, clarify applicability across sugar commodity classifications, provide guidance on filtration where anticaking agents are present, and continue reviewing methods lacking sufficient data or accessibility.

Justification: Continued technical work, with broader participation from developing countries and regional laboratories, will strengthen harmonisation, support mutual recognition of results, reduce technical barriers to trade, and enhance the effectiveness of national food control systems.

Agenda item 6: Methods of analysis for precautionary allergen labelling

Development of Numeric or Method Performance Criteria (MPC)

General Comment: Burundi appreciates the Electronic Working Group chaired by the United States of America and co-chaired by the United Kingdom for the effective coordination and progress of this work. Burundi supports the approach taken by the Codex Committee on Methods of Analysis and Sampling (CCMAS) to compile analytical methods currently in use by Members for the priority allergens listed in Table 11 of Risk Assessment of Food Allergens – Part 2, and to clearly state that the methods provided in Appendix II are for information only and are not endorsed by CCMAS. Burundi considers this approach fully consistent with the Codex Procedural Manual provisions on proprietary methods, as it avoids de facto endorsement of specific commercial kits while constructively supporting the work of the Codex Committee on Food Labelling (CCFL) on precautionary allergen labelling.

Reference Frameworks for Method Evaluation

Burundi 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, Burundi Partner States recognize 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

Burundi 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

Burundi 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. Burundi 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

Burundi 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, Burundi also 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

Burundi 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, Burundi 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

Burundi appreciates the Electronic Working Group (EWG), led by New Zealand and co-chaired by Germany, for fulfilling its terms of reference and for preparing a comprehensive discussion paper on sampling plans within CXS 234-1999 – Recommended Methods of Analysis and Sampling.

Burundi recognizes the importance of clear, harmonized, and accessible sampling plan information to support consistent conformity assessment, effective enforcement, and facilitation of international trade, particularly for developing countries.

1. Preferred Approach for Placement of Sampling Plans

Burundi supports Option 1, namely the inclusion of all endorsed sampling plan information within CXS 234-1999 as the single Codex reference for sampling plans. Burundi 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.

Burundi 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

Burundi 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. Burundi 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

Burundi notes that several Codex commodity committees have limited capacity or are adjourned *sine die*, constraining their ability to develop statistically robust sampling plans. The BURUND 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

Burundi 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

General Comment: Burundi Appreciates the Electronic Working Group (EWG), chaired by New Zealand and co-chaired by Germany, for its work in advancing the development of Codex guidance on sampling plans for bulk materials and heterogeneous lots.

Burundi supports the development of Codex guidance on acceptance sampling plans for bulk materials, with particular emphasis on mycotoxins, recognizing that mycotoxin contamination remains a major food safety and trade concern in the region. Commodities such as maize, groundnuts/peanuts, and sorghum are of critical importance to food security, public health, and regional and international trade within Burundi

Specific Comment

1. Need for New Codex Guidance

Burundi 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.

Burundi 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.

2. Practicality and Implementability

Burundi emphasizes that the proposed guidance should be practical, implementable, and scalable, considering the laboratory, inspection, and resource constraints of developing countries.

Burundi further stresses the importance of close collaboration with the Codex Committee on Contaminants in Food (CCCCF) to ensure technical alignment with contaminant-specific risk management approaches and consistency with Codex maximum levels for mycotoxins.

Justification:

Burundi competent authorities rely on feasible and reproducible sampling approaches to support enforcement under national food safety laws and standards. Guidance that is overly complex or resource-intensive may limit effective implementation and reduce regulatory confidence in sampling outcomes.

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

General Comment

Burundi appreciates the Electronic Working Group (EWG), led by Brazil and Chile, for completing its work in accordance with its terms of reference and for presenting a comprehensive framework to improve the harmonization of names, definitions, and formats for principles and provisions in CXS 234-1999 – Recommended Methods of Analysis and Sampling.

Burundi recognizes that harmonization of provisions across standards is technically complex and requires a cautious, stepwise approach. Nevertheless, improved terminology, definitions, and structure are expected to enhance clarity, internal consistency, and usability of CXS 234-1999, particularly for regulators and laboratories in developing countries.

Editorial Comment: Burundi 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)

Burundi 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.

Burundi 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*. Burundi 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, Burundi 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)

Burundi notes differing views on the inclusion of method principles not currently referenced in CXS 234-1999. Burundi 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

Burundi supports clarification of criteria for assays whose results are method-dependent, including improved wording to emphasize predominant analytical parameters influencing results. Burundi 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)

Burundi 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 prejudice 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.

Burundi 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.