

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Items 2, 3.1, 3.2, 4.1, 4.2, 5.1, 5.3, 6, 7.1, 7.2, 8**

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

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### COMMENTS OF KENYA

Kenya appreciates the opportunity to provide comments on the different agenda items for CCMAS45 as below.

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

**General Comment:** Kenya 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. Kenya supports efforts to improve document timeliness, strengthen leadership in electronic working groups, and ensure timely scientific advice to underpin Codex standards. Kenya further supports prioritization of databases on methods of analysis and sampling, as these are critical for harmonized implementation and regulatory decision-making. Kenya 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. Kenya 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:** Kenya notes the adoption of corrections to methods for quick frozen fish products and supports CCMAS consideration of further amendments under Agenda Item 3. Kenya 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):** Kenya takes note of the adoption of the Annex on Nx factors and the deletion of wheat protein products from the wheat flour entry. Kenya 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:** Kenya welcomes the reactivation 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:** Kenya supports CCEXEC proposals for interim solutions, including consultations with FAO/WHO expert bodies. Kenya notes the need for a clear, predictable mechanism to address technical questions to avoid regulatory gaps or delays in method endorsement.
5. **Scientific advice and data submission:** Kenya 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.

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

#### **General Comments**

Kenya 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. Kenya welcomes the structured presentation of methods and NPC referred by the Codex Alimentarius Commission (CAC48) and

subsidiary committees. Kenya proposes that endorsed methods should be scientifically robust, fit for purpose for the specified commodities, and realistically implementable by official control laboratories, particularly in developing countries. Kenya 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)

**Comment:** Kenya supports retention of the method and associated sample preparation provisions in CXS 234-1999, as agreed by CAC48.

**Justification:** Salt saturation remains a regulatory-relevant parameter for assessing preservation adequacy and product stability in salted fish. The existing method is calculation-based, scientifically sound, and historically applied in official controls. Revocation without a validated alternative would create enforcement gaps and reduce consistency in compliance verification and trade inspection.

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

**Comment:** Kenya supports CCMAS review of listed example methods for salt and sodium NPC.

**Justification:** Some example methods were developed and validated for limited matrices. Applying them beyond their validated scope may compromise analytical accuracy and comparability. Reviewing matrix suitability ensures methods remain fit for purpose, scientifically defensible, and reliable for regulatory enforcement. Kenya further encourages the inclusion of alternative internationally validated methods to improve laboratory applicability, particularly for developing countries.

#### 3. Sampling plans and NPC for total aflatoxins and ochratoxin A in spices

**Comment:** Kenya supports endorsement of the proposed sampling plans and 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.

#### 4. NPC for total aflatoxins using the “sum of components” approach

**Comment:** Kenya supports endorsement with clear guidance on 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:** Kenya 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  $< 44\%$ . Kenya 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)

**Comment:** Kenya 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.

### Agenda item 3.2: Methods submitted by CCFO29

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

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. Notes 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. Kenya 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. Kenya 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. Kenya 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 Kenya's food control system.
4. Kenya 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**

#### **1. Amendments and Revocations to CXS 234-1999 (Appendix I, Part 1)**

Kenya 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.

Kenya 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.

#### **2. Fish and Fishery Products**

Kenya 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 Kenya's expanding fish and fishery sector and support both consumer protection and export certification requirements.

#### **3. Fats and Oils**

Kenya 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.

Kenya 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.

#### **4. Cereals, Pulses, Legumes and Derived Products**

Kenya 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 Kenya, and the proposed methods are already widely applied in national inspection, grading, and compliance verification activities.

#### **5. Insect-Bored Kernels (Wheat and Durum Wheat)**

Kenya 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.

Kenya 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.

#### **6. Oats and Peanuts – Provisions "To Be Developed / To Be Determined" (Appendix III)**

Kenya 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).

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

Kenya 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

Kenya 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, provided that clarity on method typing and applicability is maintained.

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

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

**Technical Comment:** Kenya recommends 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 Secretariat to update the relevant Codex texts accordingly.

#### Agenda item 5.1: Fruit juices workable package

Kenya appreciates the review undertaken under the auspices of the **International Fruit and Vegetable Juice Association (IFU)** of analytical methods in **CXS 234-1999** and **CXS 247-2005**. Kenya notes that internationally validated methods remain essential to protect consumers, facilitate fair trade, and support enforcement activities.

Kenya supports the revocation of methods that are obsolete, lack validation, or are no longer supported by their SDOs. However, Kenya proposes that such revocation should only proceed after confirming the availability of suitable alternatives and allowing a transition period for methods still in use by national laboratories to maintain regulatory continuity.

Kenya supports the retention and transfer of the 52 methods identified as fit-for-purpose, particularly those critical for authenticity verification, including IRMS-based stable isotope methods, HPLC-based sugar profiling, organic acid profiling, and mineral analysis. These methods are vital to detect adulteration, undeclared additives, and misrepresentation of juice origin or composition, reflecting the continued relevance of the 2005 inclusion logic for authenticity testing.

Kenya notes concern regarding enzymatic methods linked to proprietary kits, including variability and lack of equivalence across kits. Kenya supports postponement of decisions on these methods to **CCMAS46**, to allow further technical evaluation and consideration of non-proprietary reference alternatives, emphasizing that temporary retention is needed to safeguard enforcement capacity in the absence of validated HPLC alternatives.

Kenya also highlights that ISO methods were not assessed due to limited access. Before revocation, ISO should be formally consulted, and CCMAS should evaluate global use and technical relevance to avoid unintended regulatory gaps.

Finally, Kenya supports consolidation of duplicate methods where procedures are equivalent and clear differentiation between Type II and Type III methods where procedural differences exist, ensuring analytical consistency and clarity for enforcement laboratories.

#### Agenda item 5.3: Sugars and honey workable package

**General Comment:** Kenya supports the structured cross-review of **CXS 12-1981** and **CXS 212-1999** against **CXS 234-1999**, consolidation of identical sugar commodity methods, and re-establishment of the EWG to resolve outstanding technical issues, particularly sulphur dioxide and invert sugar determinations. Kenya emphasizes that transitions to newer methods should consider laboratory capacity in developing countries, and Type I methods must remain practical, enforceable, and globally accessible.

#### Specific Comments

1. **Honey-Diastase Activity:** Retain AOAC 958.09 (Type I) and include IHC 6.1 (Type IV) where validated. Dual Type I/IV designation should be exceptional.

**Justification:** AOAC 958.09 ensures continuity and reproducibility in routine regulatory laboratories; inclusion of IHC 6.1 provides validated alternative without compromising enforceability.

2. **Honey-Added Sugars:** Replace AOAC 978.17 with AOAC 998.12, revoke AOAC 991.41, and list LC-IRMS (CEN EN 17958) as Type IV pending broader validation.

**Justification:** AOAC 998.12 is robust and accessible; LC-IRMS is scientifically valuable for authenticity testing but limited by instrumentation availability in developing countries.

3. **Honey-Sample Preparation:** Include AOAC 920.180 as complementary. Standardized preparation ensures reproducibility and analytical consistency.

4. **Sugars-Invert vs. Reducing Sugars:** Retain Type I methods (e.g., ICUMSA GS1-5) and include enzymatic or chromatographic Type IV alternatives. Transition to specific invert sugar determination should be further evaluated.

**Justification:** Type I methods provide regulatory continuity; Type IV alternatives allow higher specificity where laboratory capacity permits.

5. **Sugars-Sulphur Dioxide:** Retain AOAC 962.16 for limits >50 mg/kg; LC-MS/MS may be Type IV. Replacement should consider global availability, cost, and proficiency testing.

**Justification:** Ensures methods meet performance criteria while remaining enforceable in developing-country laboratories.

6. **Sugars-Lactose (Reducing Sugars):** Clarify applicability of ICUMSA GS4-3 and consider HPLC methods where specificity is required. Revisions should not alter limits unless scientifically justified. **Justification:** Preserves analytical accuracy while maintaining established regulatory limits.

7. **Sugars-Polarization/Filtration:** Clarify procedures for anticaking agent removal; adopt updated ICUMSA GS1-1 (2022) once implemented.

**Justification:** Ensures reliable polarization measurements and international alignment.

#### **Agenda item 6: Methods of analysis for precautionary allergen labelling**

**General Comment:** Kenya appreciate the EWG Chair United States of America and the United Kingdom, her cochair for their coordination and progress of this work. Kenya supports the approach taken by CCMAS to:

- Compile methods currently in use by Members for the priority allergens listed in Table 11 of *Risk Assessment of Food Allergens – Part 2*; and
- Clearly state that the methods listed in Appendix II are not endorsed by CCMAS but are provided **for information only** to support CCFL's work on precautionary allergen labelling.

**Justification:** This approach is consistent with the Codex Procedural Manual provisions on proprietary methods and avoids de facto endorsement of specific commercial kits.

#### **Use of AOAC and EN Guidelines as Reference Frameworks**

**Comment:** Kenya supports the use of AOAC Appendix M and relevant EN standards (EN 17855, EN 17644, EN 17254, EN 15634) as reference frameworks for evaluating method validation and performance.

**Justification:** Although not Codex-endorsed, these guidelines provide internationally recognised benchmarks for assessing fitness-for-purpose of allergen analytical methods and enhance transparency in method evaluation.

#### **Presentation of Methods in Two Informative Tables**

**Comment:** Kenya supports:

- **Table 1:** Methods with multi-laboratory validation or performance-tested status; and
- **Table 2:** Methods validated at manufacturer, single-laboratory, or in-house level.

#### **Justification:**

The distinction improves clarity for CCFL and trading partners regarding the **level of validation rigor**, without implying superiority or equivalence among listed methods.

#### **4. Fitness-for-Purpose Principle and Action Level Applicability**

##### **Comment**

Kenya supports the clear statement that:

- A method is only suitable for PAL risk assessment when demonstrated to be fit for purpose for the specific allergen, action level (AL), reference amount (RfA), and food matrix; and



- The analytical range of a method must span the relevant action level established by the FAO/WHO Expert Consultation.

**Justification:**

The wide variation in reference doses and action levels across allergens necessitates careful method selection to avoid under- or over-estimation of unintended allergen presence (UAP).

**Limitations of ELISA/LC MS/MS and Matrix/Processing Effects**

**Technical Comment:** Kenya supports the inclusion of detailed caveats regarding:

- Selectivity and added sensitivity in the LC-MS/MS
- Sample preparation for LC-MS/MS to minimize losses of target proteins
- Matrix effects and food processing (e.g. heat treatment, fermentation); especially in LC-MS/MS
- Reduced detectability due to protein denaturation; and
- Variability in performance among ELISA kits.

**Justification:** These limitations are critical for competent authorities and food business operators, particularly in processed foods commonly traded internationally.

**Reporting Units and Conversion Factors**

**Comment:** Kenya supports the recommendation that analytical results, where possible, be expressed in mg total protein from the allergenic source per kg of food, and that valid conversion factors be applied where required.

**Justification:** Inconsistent reporting units and conversion factors can lead to misinterpretation of compliance relative to action levels and undermine risk-based decision-making.

**Proprietary Methods and Trade Considerations**

**Comment:** Kenya supports the explicit reference to the Codex Procedural Manual provision that:

- Proprietary methods should not be endorsed where suitable non-proprietary methods exist; and
- Preference should be given to method performance criteria (method validation parameters) rather than specific branded methods.

**Justification:** Limited availability of proprietary kits may create barriers to trade and expose countries to risk of not monitoring allergens in case of a disruption in the global supply chain particularly for developing countries.

**Development of Numeric or Method Performance Criteria (MPC)**

**Comment:** Kenya supports the recommendation that CCMAS inform CCFL that development of numeric or method performance criteria for allergen detection may be possible in future, should CCFL request for such work.

**Justification:** While outside the TORs of the current EWG, MPC structured by allergen, matrix, and action level could provide a technology-neutral framework for future Codex work. Only three techniques (PCR, ELISA, and LC MS/MS) have been evaluated, though additional validation data/work for various products is still necessary.

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

Kenya thanks the EWG, led by New Zealand and co-chaired by Germany, for fulfilling its terms of reference and preparing a comprehensive discussion paper on sampling plans in *Recommended Methods of Analysis and Sampling (CXS 234-1999)*.

**1. Support for Proposed Options**

Kenya **supports the EWG's preferred Option 1** — including all sampling plan information in CXS 234-1999 as the single Codex reference for such information. This approach aligns with the role of CXS 234 as the authoritative reference for endorsed methods and sampling plans, facilitating harmonisation and accessibility of conformity assessment tools across commodities and Members. It also supports trade facilitation and consistency of application, consistent with Codex principles on sampling and testing of foods.

Kenya also acknowledges **Option 4** (developing separate standards for each commodity group containing sampling plans) as a *possible complementary approach* for future work, provided that linkage to a central repository or database under CXS 234 is maintained to avoid fragmentation and duplication of Codex texts.

## 2. Database and Format Considerations

Kenya supports the transition of CXS 234 from its current format to an electronic searchable database or Excel-based tool. Kenya supports further work to:

- Define the **content and structure** of a database to house endorsed sampling plans alongside analytical methods.
- Ensure that the **functionality of the database** includes creation, editing, and clear display of sampling plan entries.
- Standardise information so that sampling plans are presented clearly and consistently with corresponding provisions and test methods (e.g., sampling plan type, physical sampling procedures, parameters and decision criteria). This is consistent with efforts to align sampling plan information with Codex guidance such as CXG 50 (General Guidelines on Sampling) and the procedural framework for sampling and testing.

A searchable, electronic repository will increase coherence, transparency, and ease of use for competent authorities and laboratories, especially in developing countries.

## 3. Assistance in Developing Sampling Plans

Kenya notes that many Codex commodity committees have limited capacity or are adjourned *sine die*, which constrains their ability to develop statistically sound sampling plans. Kenya supports CCMAS playing a stronger **advisory and coordinating role** by:

- Providing technical guidance to commodity committees on sampling plan design and statistical parameters;
- Facilitating training and capacity development;
- Clarifying expectations for sampling parameters, including producer's and consumer's risks consistent with Codex principles.

This support is important to ensure that sampling plans specified in Codex standards are scientifically robust and fit-for-purpose across diverse contexts.

## 4. Establishment of a New EWG

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

- Refining the content and presentation of sampling plan information;
- Integrating existing sampling information from CXS 234;
- Defining how the system will be maintained and updated over time.

This will help operationalise the agreed approach and support coherent implementation by all Members.

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

Kenya thanks EWG Chair New Zealand; Co-Chair Germany and supports the development of Codex guidance on sampling plans for bulk materials and heterogeneous lots, with particular emphasis on mycotoxins. Mycotoxin contamination remains a significant food safety and trade concern for Kenya, especially in commodities such as maize, peanuts, and sorghum. Clear, practical, and scientifically sound Codex guidance will strengthen national food control systems and facilitate compliance with international trade requirements.

Kenya supports the initiation of new work to develop general guidance on acceptance sampling plans for bulk materials, particularly for mycotoxins, as current approaches referenced in CXS 193 have limitations in effectively addressing inhomogeneous contamination. Kenya proposes that the proposed guidance should be annexed to CXG 50-2004.

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

#### General Comment

Kenya thanks the EWG led by Brazil and Chile for completing its work in accordance with its terms of reference and for presenting a comprehensive framework for improving the harmonization of names, definitions, and formats for principles and provisions in *Recommended Methods of Analysis and Sampling* (CXS 234-1999).

Kenya recognizes that, while harmonization of provisions is complex and requires caution, improvements in terminology and structure can enhance clarity, consistency, and usability of CXS 234-1999.

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

Kenya **supports the proposed consolidated structure and harmonized terminology** for principles of

methods of analysis, including:

- Clear definition of the term “*principle*” as the analytical technique used to determine the provision result.
- Alignment of definitions with internationally recognized references (e.g. IUPAC, VIM, GUM, ISO).
- Clarification of analytical technique descriptions to avoid ambiguity and overlap.

Kenya supports the replacement of ambiguous or outdated terminology (e.g. replacing “ashing” with “incineration”) and the refinement of generic terms such as “calculation” to more precise expressions (e.g. “calculated method-principle”), to improve scientific clarity and consistency.

### Scope of Method Principles (Annex A)

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

- Retention of such principles **may be acceptable on an interim basis** to provide a harmonized framework for potential future updates;
- However, **future inclusion of new principles should remain strictly linked to the endorsement of new methods**, in line with established Codex procedures and mandates.

CCMAS guidance is therefore essential to determine whether these principles should be retained or removed at this stage.

### Criteria Used and Presentation of Principles

Kenya supports the clarification of criteria for assays whose results are method dependent, including improved wording to emphasize predominant parameters affecting results; and

Kenya further supports the proposal to remove secondary or procedural information from method principles unless such information is critical to the determination of the result, thereby ensuring that principles remain concise, harmonized, and fit-for-purpose.

### Harmonization of Provisions (Annex D)

Kenya acknowledges the significant technical complexity associated with harmonizing provisions across commodity standards and CXS 234-1999. Kenya therefore:

- Supports the proposed classification approach (editorial/no-change provisions; provisions linked to active committees; provisions linked to inactive committees) as a practical framework to guide further work.
- Agrees that examples presented in Annex D provide useful guidance but should not prejudice final decisions.
- Proposes that any substantive changes to provisions should be undertaken in consultation with the responsible commodity committees, in line with Codex procedures.