

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Items 3.1, 3.2, 4.1, 4.2, 5.1, 5.2, 6, 8

MAS45/CRD16

March 2026

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 AUSTRALIA

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

#### Method for salt saturation in salted fish and dried salted fish of the Gadidae family of fishes and Example methods provided for certain numeric performance criteria (NPC) for salt and sodium

Australia thanks Thailand for their submission at CAC48/CRD36.

We agree with the issue identified by Thailand in CAC48/CRD36, and as per CX/MAS 26/45/3 the method for the determination of salt saturation in salted fish and dried salt fish of the Gadidae family of fishes and Appendix VIII, Part 1 of CXS 234-1999 should not be revoked. However, we do need to link the Sodium Chloride NPC & Salt saturation provision plus 'address provisions without direct references in the product standards' i.e. 'Moisture (Water content in whole fish) and 'Sample preparation'. Australia's suggestion is:

Fish and fishery products				
Commodity	Provision	Method	Principle	Type
Salted fish and dried salted fish of the Gadidae family of fishes	<u>Salt saturation</u>	<u>see equation in footnote<sup>xii</sup></u>	<u>Calculation from %! Moisture (Water content in whole fish), and % Salt (Sodium Chloride)</u>	
	<u>Moisture</u>	<u>AOAC 937.07 and AOAC 950.46B (air-drying (a)) &amp; Sample preparation - Appendix VIII Part I.</u>	<u>Gravimetry</u>	<u>!</u>
	<u>Sodium Chloride</u>	<u>See Table 5 MPC for sodium chloride and for salt determined as chloride expressed as sodium chloride</u>	<u>Titrimetry</u>	<u>NA</u>

<sup>xii</sup> The % salt saturation is calculated as follows:

1. % salt in water = (% salt content / (% salt content + % moisture)) x 100%

2. % salt saturation = (% salt in water / 26.4 %) x 100%

\* The solubility of sodium chloride in water is 36 g per 100 g water, and the constant is calculated as follows: 36 g sodium chloride / (100 g water + 36 g sodium chloride) x 100% = 26.4%

With respect to the NPC the methods AOAC 971.27(Titrimetry - Potentiometric), AOAC 976.18(Titrimetry - Potentiometric), AOAC 937.09 (Titrimetry – Mohr) already had a long history of endorsement and logical choices for inclusion as examples when developing the NPC for sodium chloride. Unfortunately, the AOAC 971.27 title 'Sodium Chloride in Canned Vegetables: Method III (Potentiometric Method) is misleading considering the scope includes

- o Clear liquids with low viscosity (Fruit juices, clear soups, wines, etc.)
- o Comminuted products (Tomato juice, tomato catsup, strained vegetables, etc.)

- o General method for heterogeneous (fish, meat, etc.), low moisture (cereal products, etc.), and hard-to-disperse homogeneous (cheese, peanut butter, etc.) foods.
- o other types of foods.

**Australia believes the CXS 234 Table 5. Numeric performance criteria for sodium chloride and for salt determined as chloride expressed as sodium chloride examples are appropriate and fit for purpose.**

**Numeric performance criteria for methods of analysis for total aflatoxins utilizing the sum of components concept in relevant sampling plans**

Australia supports endorsement of the CX/MAS 26/45/3 Appendix II Part C table as Numeric performance criteria for total aflatoxins in the specified nut matrices but retain only criteria against the individual AFB1, AFB2, AFG1 & AFG2, not the 'AF B1+B2+G1+G2' as this implies that use of ELISA kit style analyses calibrated on the metabolite AFB1 instead of four metabolites, as suitable (NPC only apply to Type II/III methods see Procedural Manual paragraph 172) and importers may be forced to accept lots based on a less accurate and less specific ELISA kit style method.

**Draft standard for spices in the form of dried fruits and berries, requirements for vanilla**

For the application to Vanilla of ISO 927-Determination of extraneous matter and foreign matter content, the ISO 927 Table 1 — Laboratory sample and test portion size, does not include Vanilla, so we should state an Appropriate test portion size, as a footnote e.g. \*100 g test portion size, for the respective provisions 'Extraneous matter' and 'Live Insect' or alternatively ask CCSCCH for this information.

**Agenda item 3.2: Method of analysis for the determination of gamma oryzanol in crude rice bran oil**

The proposed method for inclusion in the appendix has a principle Spectrometry – UV and utilizes a specific extinction coefficient  $\varepsilon_{1cm}^{1\%} = 359$ . However, it is reported at this wavelength (314nm), the absorbance of the oil "matrix" may be not-negligible and the results inaccurate. Without a practical standardized alternative and a history of method use, Australia support method transfer to CXS 234 as an Appendix but retain the method typing as Type IV (and not endorse as Type III). We also look forward to an SDO developing a standardized method with more complete MLV validation and performance compliant with the Codex method performance criteria.

**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)**

Australia thanks Canada for preparing this document and supports the outcomes of this review.

With respect to an item at the end of the report asking for advice on the presentation of methods of analysis for group entries. Australia believes 'the current groupings' previously used for efficiency and consistency for a MS Word based system, would be problematic when developing a database. Australia prepared a MS Excel prototype of the CXS 234(2024) so has some feature like a database, but a .pdf printable document is still possible. Noting, we only suggest this as a reasonably easily produced transition tool for members as we investigate possibilities and progress to a full CXS 234 database.

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

Australia thank Chile for preparing this document.

The issue is ISO 1871 provides 'general guidelines for the determination of nitrogen by the Kjeldahl methods' and does not specify 'a method for the determination of the nitrogen content' for the quinoa sector of activity. Typing a method as Type I which allows variable 'Conditions/ Chemicals Reagents used' parameters, is contrary to the current Type I definition, how it was intended to be applied, how it has been applied for the last 50 years (since CCMAS10 (1977)), and creates a dangerous precedent for the future 'Typing of Methods'. So, while a simple solution for the variable Kjeldahl methods of analysis used for Quinoa in one region, it could have implications for the broader CCMAS system, and we would encourage CCMAS to think carefully about this. As an example of the variable parameters the digestion salts/catalyst used in the study where some contained selenium, others Titanium dioxide, and while all containing high % of sulfate salts, only three labs conformed to the ISO 1871 guidance 'the quantity of K<sub>2</sub>SO<sub>4</sub> provided by the catalyst should not be less than 7g'.

While the validation data is not in dispute, and 'Precision figures for methods are an important aspect of assessing the performance of methods and that for newly developed / proposed Type I methods', the predominant aspect is that the 'method' meets the Type I method definition ( and in this case that it must be a detailed 'method' and not a 'general guideline').

Australia does not support the ISO 1871 being accepted as a Type I method and it must either remain as a Type IV or an alternative method compliant with a Type I definition.

We would also state that with respect to Tehena provision for 'Protein content' where ISO 1871 method is listed as a Type I, this was an historical error which we should 'fix' by re-typing, not propagating the error.

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

Australia thanks the IFU expert group for preparing this document and particularly the inclusion of Juice Min and Max (g/l) values. These 'values' facilitated our review of the methods.

Australia continues to believe the committee needs to take a more proactive approach to obtain various juice and nectar commodities specification levels, at least for the quality provisions. We envisage this would be a large table of different juice and nectar commodities with various quality provision specifications (as all other commodity committees have done). While potentially allowing CCFIC's 'Food fraud' discussions and guideline to be finalized, then revising how we progress the 'Authenticity' methods, where a specification may not be readily available.

Australia supports the expert group decision to postpone a decision on the list of enzymatic provisions that should be reconsidered in 2027 by CCMAS as a thorough review is required. However, it makes any other method typing decisions difficult as this list contains many Type II methods.

While CCMAS45 may wish to continue to endorse methods where consensus is reached on a methods fitness-for-purpose, Australia continues to believe at least moving towards establishing a commodity/provision/specification approach with fruit juices and nectars similar to what we require of all other commodity and regional committees is necessary.

#### Agenda item 5.2: Cocoa products and chocolate workable package

Australia thanks Serbia and US for preparing this document.

Australia broadly supports the endorsement of the proposed amendments / revisions to CXS 234-1999 indicated in CX/MAS 26/45/7 Appendix I.

With respect to seeking proposals for additional methods other than AOAC 980.14, if any, for the determination of full-fat cocoa powder, fat-reduced cocoa powder and highly fat-reduced cocoa powder (in mixtures). Australia suggests a change in the provision name to align with CXS 105. Plus, replacement of AOAC 980.14, as it only measure theobromine + caffeine (and doesn't provide the relationship back to the actual provision) with either EU CLEN Method ILIADe 112 or UK Dept for Environment, Food & Rural Affairs Report FA02004 (2010) Appendix 7 SOP Measurement of Total Alkaloids in Foods Containing Cocoa and Chocolate, Version 1.0, plus addition of a footnote on how to calculate. See example entry below.

Commodity	Standard	Provision	Method	Principle	Type	Comment
<b>Cocoa powders (cocoas) and dry mixtures of cocoa and sugars</b>	<b>CXS 105</b>	<b>Determination of full-fat cocoa powder, fat-reduced cocoa powder and highly fat-reduced cocoa powder—Cocoa powder content</b>	<b>AOAC 980.14</b> <b>EU CLEN Method ILIADe 112</b>  <b>Requires footnote: {Cocoa powder content (weight%) = [theobromine content (weight%) + caffeine content (weight%)] x 31}</b>	<b>HPLC-UV LC and calculation</b>	<b>I</b>	<b>Issue:</b> AOAC 980.14 does not provide a conversion factor for Cocoa Powder content.  <b>Suggest:</b> EU CLEN Method ILIADe 112:2023. Alternatively, UK Dept. Environment, Food & Rural Affairs Report FA02004 Appendix 7 SOP Measurement of Total Alkaloids in Foods Containing Cocoa and Chocolate, Version 1.0

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

Australia thanks the United States and the United Kingdom for preparing this document and would like to submit the following comments.

Australia agrees with the EU position (MAS45/CRD06), i.e. Support the proposed reply to CCFL and suggest that the AOAC and CEN validation and method performance requirements are adopted by reference for Codex purposes.

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

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

Australia thanks Brazil and Chile for preparing this document and would like to submit the following comments.

Australia believes the current CXS 234 provisions list is clear and concise, and further efforts to rationalize and standardize will only result in the loss of critical information and reiterated our position that the review/harmonization of provisions Annex D of CX/MAS 26/45/12 Appendix I be removed.