CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 4.1, 5.2, 5.3, 7.2 **MAS45/CRD27**

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CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

Forty-fifth Session

Budapest, Hungary

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COMMENTS OF AZERBAIJAN

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)

Azerbaijan expresses it's appreciation for the comprehensive review conducted by the Electronic Working Group (EWG) Chaired by Canada. Azerbaijan supports the objective of replacing methods within commodity standards with a general reference to CXS 234-1999 to ensure consistency and promote the use of fit-for-purpose methods.

Recommended amendments and revocations to CXS 234-1999 (Appendix I, Part 1): To facilitate international trade through cost-effective and accessible analytical methods, Azerbaijan notes following updates:

- **Fish and Fishery Products:** Azerbaijan welcomes the addition of straightforward gravimetric methods for moisture (AOAC 950.46B) and drained weight (AOAC 953.11). Azerbaijan also agrees with the revocation of combined entries for frozen fish products in favour of specific individual entries to avoid overlap.
- **Fats and Oils:** Azerbaijan agrees with the transition to modern capillary column techniques (e.g. AOAC 2012.13) and the inclusion of precise potentiometric methods for salt content.
- **Cereals, Pulses, and Legumes:** Azerbaijan considers the retention of practical visual and sieving methods appropriate and supports the separate classification of durum wheat with corresponding analytical methods.

Recommended amendments to commodity standards (Appendix I, Part 2): Azerbaijan agrees with the proposed consequential amendments and revocations to the commodity standards, replacing specific method descriptions with general references to CXS 234-1999.

Methods recommended to be retained in CXS 234-1999 with no amendments needed (Appendix II): Azerbaijan agrees that the methods listed in Appendix II are already endorsed, remain fit-for-purpose, and may therefore be retained in CXS 234-1999 without modification

Provisions for which the EWG was unable to recommend methods, principles and typing (Appendix III): Noting the lack of internationally validated analytical methods for specific provisions in oats and peanuts, Azerbaijan agrees with the EWG's call for further method development.

Agenda item 5.2: Cocoa products and chocolate workable package

Azerbaijan thanks the Electronic Working Group (EWG) chaired by Serbia for its diligent work and acknowledges the valuable collaboration with Standards Development Organizations (SDOs). The editorial improvements to method names (e.g., IOCCC to ICA) and analytical principles are welcomed, as they enhance clarity and global applicability. Azerbaijan generally agrees with the proposed amendments to CXS 234-1999 as set out in Appendix I, with the following technical observations.

- **Cocoa butter (determined as fat) / Fat (CXS 87, CXS 141, CXS 105):** Azerbaijan agrees with the listed methods (ICA No. 26 / AOAC 977.10 and AOAC 963.15 / ICA No. 14), the updated analytical principles (calculation from moisture and gravimetry/Soxhlet extraction), and their retention as Type I.

The Soxhlet extraction procedure demonstrates strong analytical robustness and reproducibility (RSD 1–3%), ensuring comprehensive lipid recovery from the cocoa matrix and reliable quantification of total fat.

- **Milk fat (CXS 87):** Azerbaijan supports the proposed change in typing from Type I to Type IV for the listed titrimetry/distillation methods. This re-typing appears scientifically justified, as traditional techniques may be susceptible to matrix interferences in complex confectionery formulations. In the longer term, the Committee may wish to consider the development or identification of more specific Type II or Type III methods for this provision.
- **Moisture / Moisture (determined as water) (CXS 87, CXS 105):** Azerbaijan supports the approach of retaining the gravimetric method (loss on drying) as Type I and including Karl Fischer titrimetry as a Type II method. For additional clarity in Codex method typing, the Committee may wish to consider distinguishing between empirical “loss on drying” and true “water content” in the provision names, which could help avoid ambiguity and support precise dispute resolution.
- **Non-cocoa butter vegetable fat & Cocoa butter equivalents (CXS 87):** Azerbaijan welcomes the inclusion of these provisions and their respective GC-MS and GC-FID analytical principles. The proposed typing—Type IV for AOCS Ce 10/-02 and Type II for ISO 23275-1/2 and ISO 11053—appears appropriate. These gas chromatographic methods provide the analytical specificity required for detecting adulteration and verifying product authenticity.
- **Free fatty acids & Unsaponifiable matter (CXS 86):** Azerbaijan agrees with retaining the equivalent methods for these provisions as Type I. The proposed titrimetric and gravimetric approaches provide reliable indicators of lipid hydrolytic degradation and purity. To further promote international harmonization, preference for ISO standards may be considered where applicable.
- **Determination of full-fat cocoa powder, fat-reduced cocoa powder and highly fat-reduced cocoa powder (CXS 105):** Azerbaijan agrees with retaining AOAC 980.14 (LC and calculation) as a Type II method. Regarding the EWG’s invitation to propose additional methods, Azerbaijan does not have alternative methods to submit at this stage but remains open to evaluating proposals from other delegations that may provide enhanced analytical specificity.

Agenda item 5.3: Sugars and honey workable package

Azerbaijan expresses its appreciation to the Electronic Working Group (EWG) chaired by Uruguay for the comprehensive review of the methods of analysis for honey and sugars. As a producer of high-quality mountain and polyfloral honey, Azerbaijan emphasizes the importance of utilizing internationally validated methods that protect product authenticity.

Regarding the determination of added sugars in honey, Azerbaijan supports the transition to AOAC 998.12. Azerbaijan also welcomes the inclusion of CEN EN 17958 (LC-IRMS) as a supportive method. The incorporation of LC-IRMS technology represents a pragmatic advancement, providing a validated basis for detecting complex adulteration without establishing it as the sole reference method. This approach allows laboratories to access advanced isotopic “fingerprinting” techniques while maintaining technical consistency across different regulatory frameworks.

In the analysis of Hydroxymethylfurfural (HMF), Azerbaijan notes that traditional spectrophotometric methods may be susceptible to interference in certain complex honey matrices. Azerbaijan therefore favors the use of HPLC-UV methods, such as IHC 5, due to their greater analytical specificity and precision. Such methods provide a more reliable assessment of honey freshness, which is a critical quality indicator for international trade.

Azerbaijan would like to highlight a technical concern regarding the proposed Method Typing. Azerbaijan is of the view that the simultaneous endorsement of Type IV methods alongside existing Type I methods - particularly for Acidity and Diastase Activity - is not compatible with the principles of the Codex Procedural Manual. As a Type I method is the sole defining method for establishing the accepted value of a provision, the co-existence of Type IV alternatives for the same provision pair undermines analytical consistency and creates ambiguity in regulatory enforcement. Consequently, Azerbaijan recommends that the Committee prioritize the selection of a single, technically superior Type I method, or consider the endorsement of rational Type II or III methods where appropriate to ensure scientific accuracy and global harmonization.

Finally, Azerbaijan supports the revocation of legacy methods that no longer meet modern performance criteria. To ensure a smooth transition and maintain the inclusiveness of international trade, Azerbaijan recommends that the Committee provides clear technical guidance on the implementation of the newly endorsed methods to assist laboratories in upgrading their analytical infrastructure.

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

Azerbaijan extends its gratitude to the Electronic Working Group, led by New Zealand and co-chaired by Germany, for developing the proposed sampling plans. Azerbaijan welcomes the initiative to prepare a discussion paper aimed at harmonizing the statistical foundations for sampling heterogeneous lots. Azerbaijan emphasizes that such protocols should seek to reduce both Producer and Consumer Risk while maintaining operational feasibility at points of entry, thereby avoiding unnecessary technical barriers to trade.

Question (a): The appropriateness and timeliness of developing general guidance on acceptance sampling plans for bulk materials from inhomogeneous lots, with particular emphasis on mycotoxins

Azerbaijan considers the development of this guidance to be appropriate, on the condition that it remains focused on providing a general scientific framework. Azerbaijan aligns with the view that CCMAS should focus on the methodology and approaches for sampling plans, while respecting the mandate of especting the mandates of other commodity and subject committees (such as Codex Committee on Contaminants in Food (CCCF)) to develop specific plans for contaminants. Azerbaijan therefore recommends the integration of empirical estimation tools, such as the “Duplicate Method” (in line with ISO/IEC 17025 and Eurachem guidelines) - to allow laboratories to estimate sampling-related uncertainty in a practical manner without requiring resource-intensive experimental designs.

Question (b): Where such guidance should appropriately reside

Azerbaijan agrees with the recommendation that this guidance should be included as an Annex to the General Guidelines on Sampling (CXG 50-2004). Such placement would ensure formal integration into the existing Codex framework, providing a centralized reference for commodity committees while avoiding discrepancies with existing standards, which could lead to regulatory uncertainty.

Question (c): The proposed acceptance sampling plans for bulk materials from inhomogeneous lots (CX/MAS 26/45/11 Appendix 1)

Azerbaijan notes that the proposed structure in Appendix 1 provides a sound scientific basis for further development. However, Azerbaijan cautions against enforcement approaches that rely heavily on prior statistical information, as such data is rarely available to inspectors in the field. In the future, it is recommended that a clear distinction be made between procedures for homogeneous and inhomogeneous lots. It is imperative that new guidelines maintain operational feasibility to avert the imposition of unnecessary technical barriers to trade.