

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Items 3.1, 4.1, 5.1, 5.3, 6, 7.1, 7.2**

**MAS45/CRD29**

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

Forty-fifth Session

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### **COMMENTS OF INTERNATIONAL UNION OF FOOD SCIENCE AND TECHNOLOGY (IUFOST)**

The objective of this Conference Room Document (CRD)<sup>1</sup> is to provide comments on behalf of the International Union of Food Science and Technology (IUFOST), an observer organization of the Codex Alimentarius Commission, on agenda items tabled at the 45<sup>th</sup> Session of the Codex Committee on Methods of Analysis and Sampling (CCMAS45).

The International Union of Food Science and Technology (IUFOST) represents the largest gathering of food science and technology scientists from around the world, consisting of over 300,000 scientists from more than 100 countries.

In this context, IUFOST supports the continued strengthening of Codex work on methods of analysis and sampling through scientifically robust, internationally validated, and operationally feasible approaches. In particular, the ongoing revision of "Recommended Methods of Analysis and Sampling" (CXS 234-1999) and related Codex texts is of key importance to ensure that endorsed methods remain fit for purpose, aligned with current scientific knowledge, and applicable across diverse laboratory systems and regulatory contexts. IUFOST further supports efforts aimed at reinforcing the role of CXS 234-1999 as the primary and consolidated reference for Codex methods of analysis and sampling, which would contribute to greater clarity, consistency of interpretation, and improved usability for regulators and laboratories worldwide.

In the following sections, IUFOST provides more specific comments on selected agenda items under consideration.

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

IUFOST supports endorsement of the proposed provisions while encouraging CCMAS to clarify the establishment, interpretation and practical application of numeric performance criteria for methods of analysis for total aflatoxins utilizing the sum of components concept.

In fact, these criteria are expressed both for total aflatoxins and for the individual aflatoxins (AFB1, AFB2, AFG1 and AFG2), assuming a 1:1:1:1 ratio between the four compounds. This assumption may not always reflect natural contamination profiles, where AFB1 is typically the predominant component.

IUFOST therefore suggests that additional clarification be provided, particularly for data providers and laboratories reporting both individual aflatoxins and their sum, with specific regard to the reporting of the LOQ for total aflatoxins, which constitutes one of the mandatory fields in the GEMS/Food database. Such clarification would support comparability of analytical data used for regulatory control and risk assessment.

#### **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)**

IUFOST supports the adoption of the proposed amendments and deletions under Annex I. However, it is important to highlight the need to maintain methodological flexibility when describing the principles of chromatographic techniques (e.g., HPLC detection systems), and to avoid unnecessary specification of particular detector types where alternative validated options may provide higher sensitivity. This is illustrated

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<sup>1</sup> This CRD was prepared by the Group of Experts of the [Global Food Regulatory Science Society \(GForSS\)](#), the Disciplinary Group of the [International Union of Food Science and Technology \(IUFOST\)](#).

in methods such as EN 12822, EN 12823-1 and ISO 9936, where quantification using both UV and fluorescence detection is recommended.

#### **Agenda item 5.1 and 5.3: Fruit juices and sugars and honey workable packages**

IUFoST notes the following considerations:

- Supports the rationalization and revocation of obsolete methods that are no longer validated or supported by their originating standards development organizations (SDOs), as this strengthens the scientific credibility of Codex standards and ensures that only internationally maintained and validated procedures remain referenced.
- Highlights the importance of maintaining robust analytical methods supporting authenticity control, particularly for commodities such as fruit juices and honey, which are recognized as vulnerable to various forms of adulteration or misrepresentation. In this regard, IUFoST notes the continued relevance of advanced analytical approaches, including stable isotope techniques, chromatographic methods and marker-based analyses.

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

IUFoST welcomes the scientifically balanced approach reflected in the draft CCMAS response to CCFL. The analysis appropriately notes that the listed methods are informative rather than endorsed, and that their suitability depends on the specific allergen, relevant action level, reporting unit, food matrix, and processing conditions. IUFoST also highlights the importance of:

- fitness-for-purpose in relation to Action Levels (ALs), ensuring that selected analytical methods provide limits of quantification (LOQs) sufficiently below the relevant AL and analytical ranges that adequately cover the concentration levels of regulatory interest.
- harmonization of reporting units, preferably expressed as mg of total protein from the allergenic source per kg of food, in order to facilitate consistent interpretation of results.
- the influence of matrix and processing effects on analytical performance and therefore stresses the importance for laboratories to verify method performance in relevant food matrices and processed products.

Future Codex work may usefully explore whether numeric performance criteria can be developed for allergen methods in a way that preserves methodological flexibility while improving comparability and confidence in results.

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

IUFoST supports the principle that each relevant provision should, as far as possible, be associated with a clearly identified sampling plan, just as it is associated with a method of analysis. The preference expressed in the working document for a single consolidated reference (option 1), ideally through an electronic database integrating methods and sampling plans, is scientifically and operationally sound.

IUFoST therefore supports continued work toward a user-friendly and searchable system within the CXS 234 framework, while also emphasizing that governance responsibilities must remain clear. Commodity committees should continue to define the sampling needs of their standards (i.e. risk levels), while CCMAS can provide technical and statistical leadership on structure, consistency, and endorsement.

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

IUFoST supports initiation of new work to develop general guidance for sampling plans for bulk and heterogeneous lots, preferably as an annex to CXG 50-2004.

In IUFoST's view, any future work in this field should generate not only conceptual guidance but also practical outputs, including worked examples, decision-support tools, and structured global data collection to improve evidence-based plan design over time.

IUFoST reaffirms its commitment to supporting Codex work through its expertise in food science, analytical science, and regulatory science, contributing to the strengthening of the scientific basis, transparency, and practical applicability of Codex methods of analysis and sampling.