

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 - www.codexalimentarius.org

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

MAS45/CRD30

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 BAHRAIN, EGYPT, IRAQ, LIBYA, OMAN, QATAR, TUNISIA, YEMEN

INTRODUCTION: Arab and CCNE Coordination - Development of the Conference Room Document

The positions and recommendations expressed in this Conference Room Document (CRD) are the result of structured regional coordination conducted under the framework of the **Arab Codex Initiative**¹, with the oversight and the leadership of the Coordinator for the Near East (Sultanate of Oman). The Arab Codex Initiative is led and implemented by the Arab Industrial Development, Standardization and Mining Organization (AIDSMO), in partnership with the Global Food Regulatory Science Society (GForSS), a disciplinary group of the International Union of Food Science and Technology (IUFoST). Both AIDSMO and IUFoST hold observer status with the Codex Alimentarius Commission.

Within this framework, a dedicated Regional Expert Working Group was convened to review the relevant agenda items of CCMA45 and develop coordinated technical recommendations. The Working Group brought together experts from the following Member countries: **Bahrain, Egypt, Iraq, Libya, Oman, Qatar, Syrian Arab Republic, Tunisia, United Arab Emirates, and Yemen.**

The recommendations contained in this document reflect the coordinated technical views of the participating countries and are the outcome of regional consultation and consensus-building efforts. They are submitted to support coherent and science-based engagement at CCMA45.

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

The Regional Expert Working Group:

1. Expresses readiness to actively contribute to the identification, development and validation of analytical methods required to support quality and safety provisions related to future work on pasteurized liquid camel milk.
2. Encourages early consultation between CCMA and CCMA45 to ensure that proposed provisions are accompanied by fit-for-purpose analytical methods and, where relevant, appropriate sampling guidance.

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

The Regional Expert Working Group:

1. Supports endorsement of sampling plans and numerical performance criteria (NPC) proposed by CCCF, particularly for mycotoxins in spices and nuts, recognizing their alignment with MLs and established Codex analytical principles.
2. Encourages clarification on the “sum of components” approach for total aflatoxins, particularly regarding harmonized determination and reporting of LOQs, to ensure consistent interpretation and data comparability.

¹<https://gforss.org/networks/arabcodex/>

3. Reiterates support for the methods proposed under the Regional Standard for *Maamoul*, as previously agreed at CCNE12.
4. Supports endorsement and updating of methods proposed by CCSCH, including transition toward instrument-based analytical techniques (e.g., replacement of ISO 3513 by ASTA 21.3 for pungency in chilli and paprika) and broader use of internationally recognized ISO methods (ISO 927), which enhances methodological coherence within CXS 234-1999.

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)

The Regional Expert Working Group recommends CCMAS45 to:

1. Adopt the proposed amendments and deletions under Annex I. It is, however, important to highlight the importance of maintaining methodological flexibility in describing chromatographic techniques principles (e.g., HPLC detection systems), avoiding unnecessary specification of detector types where alternative validated options (e.g., fluorescence detection) may provide higher sensitivity, e.g. EN 12822, EN 12823-1 and ISO 9936, where quantification by both UV and fluorescence detection are mentioned.
2. Confirm that methods listed in Annex II require no modification.
3. Encourage accelerated international development of validated methods for unresolved provisions in peanuts and oats.
4. Provide guidance on the optimal presentation of analytical methods in the future electronic database of CXS 234.
5. Ensure that endorsed methods remain scientifically robust and operationally applicable for official control laboratories worldwide.

Agenda item 5.1: Fruit juices workable package

The Regional Expert Working Group:

1. Supports the rationalization and revocation of obsolete methods no longer validated or supported by their originating SDOs, as this strengthens scientific credibility and ensures that only internationally maintained procedures remain in Codex texts.
2. Emphasizes the importance of authenticity control given the vulnerability of fruit juices to adulteration. The group underlines the continued relevance of stable isotope, chromatographic, and marker-based methods for detecting added sugars, syrups, or misrepresentation.
3. As some ISO methods were not reviewed due to lack of access, the group supports ensuring that full technical assessment is conducted before final decisions are taken.

Agenda item 5.3: Sugars and honey workable package

The Regional Expert Working Group:

1. Agrees to endorse the EWG recommendations on methods (retain, amend, include, or revoke) as summarized in Appendix I.
2. Supports not to include certain methods (e.g., sugar content, electrical conductivity, starch content) in CXS 234-1999 for the time being.
3. Emphasizes the importance of authenticity control in the case of honey and agrees to replace AOAC 991.41 with AOAC 998.12 for SCIRA “stable carbon isotope ratio analysis” (honey authenticity) and to include this method in CXS 234-1999 replacing AOAC 998.18 and agree to revoke AOAC 991.41 from CXS 12-1981.
4. Agrees to re-establish the EWG to address outstanding technical issues and inaccessible or insufficiently reviewed methods.

Agenda item 6: Methods of analysis for precautionary allergen labelling

The Regional Expert Working Group:

- Supports forwarding the draft response to CCFL, recognizing that it appropriately clarifies that listed methods are provided for information and are not endorsed, and that suitability must be demonstrated case-by-case.

- Emphasizes fitness-for-purpose relative to action levels (ALs), ensuring that selected methods have LOQs sufficiently below the relevant AL and analytical ranges that cover the required concentration levels.
- Encourages harmonized reporting units, preferably expressed as mg total protein from the allergenic source per kg food, to facilitate consistent interpretation and trade.
- Highlights matrix and processing effects, stressing the need for laboratories to verify method performance in locally/regionally relevant food matrices.
- Acknowledges trade and accessibility implications, particularly the reliance on proprietary ELISA kits and the importance of ensuring method availability across regions.
- Encourages CCMAS to remain open to future discussion on numeric performance criteria (NPC), should CCFL request further work in this area.

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

The Regional Expert Working Group:

1. Supports a single consolidated reference (Option 1), where all sampling plan information would be included in CXS 234-1999, ideally through a searchable electronic database integrating methods of analysis and sampling plans.
2. Supports development of a searchable database for methods and sampling plans, with a clear presentation linking each provision to the analytical method and the corresponding sampling plan for the provision/commodity in question.
3. Recommends commodity committees remain responsible for defining sampling requirements for their provisions. CCMAS can provide technical /statistical support and assist in identifying priority areas and endorsing sampling plans. Therefore, clear guidance should be developed on division of responsibilities.
4. Supports the establishment of a new EWG to define the database structure, clarify minimum required sampling information, and develop practical implementation steps.

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

The Regional Expert Working Group recommends CCMAS45 to:

1. Support that the format for the proposed guidance be as an annex to the General Guidelines on Sampling (CXG 50-2004), which would grant it official Codex status and ensure its use by all relevant committees and authorities.
2. Approve the initiation of new work to develop general guidance for acceptance sampling plans for bulk materials and inhomogeneous lots, with a special focus on mycotoxins, based on the discussion paper in Appendix I.
3. Agree on the need to officially inform the Codex Committee on Contaminants in Food (CCCF) of this endeavor, invite its members and observers to actively participate in the EWG, and request their views on the acceptable risk levels that should underpin the new plans.
4. Emphasize that the scope of the new work must explicitly include:
 - Developing a clear and simplified methodology for evaluating the risks of current plans in CXS 193, explicitly accounting for the number of increments and contamination levels with specifying a minimum of necessary data (preparation capacity, analytical performance per food matrix, sampling plan implemented, environmental conditions...)
 - Preparing a practical, step-by-step guidance manual explaining how to apply the utility approach, supported by numerical examples and reference tables (Standard Plans) for a transitional period.
 - Designing a user-friendly electronic tool for calculating risks and utility, to be made available in multiple languages, with the understanding that the tool is an aid, not a substitute for scientific understanding.
 - Defining clear mechanisms for collecting and analyzing global data to feed the model and update it periodically.

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

The Regional Expert Working Group supports harmonization of terminology and format in CXS 234-1999 and emphasizes that harmonization should be editorial and clarity-enhancing, not a reopening of scientific or policy decisions.

In addition to the following:

1. For Annexes A & B (Principles & Acronyms), the group:

- Supports clearer definitions aligned with international terminology (IUPAC, ISO, VIM).
- Supports using a consistent format: Technique + detector (if applicable).
- Encourages removing unnecessary procedural details from “principle”.

2. For Annex C (Standard Method References)

The inclusion of journals (e.g., *Analytica Chimica Acta*) differs from standard-setting bodies. Therefore, the group requests clarification whether Annex C is limited to standard organizations or broader references.

3. For Annex D (Harmonization of Provisions), the Group:

- Supports harmonizing provision names (e.g., single standardized terms).
- Supports splitting combined provisions (e.g., “calcium and magnesium”).
- Supports deleting “sample preparation” as a provision, provided no normative requirement is lost.
- Emphasizes that substantive changes must be referred to the responsible commodity committee.