

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 7.1

CX/MAS 26/45/10 Add.1

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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

REVIEW OF SAMPLING PLANS IN CXS 234-1999

Comments in reply to CL 2026/5-MAS

Submitted by:

*Australia, Brazil, Ecuador, Egypt, European Union, Indonesia, Iraq,
Japan, Peru, Rwanda, United States of America (USA) and
the International Commission for Uniform Methods of Sugar Analysis (ICUMSA)*

Background

This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2026/5-MAS issued in February 2026. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

The comments submitted through the OCS are hereby annexed and presented in tabulated format.

ANNEX

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
Commodity committees are responsible for developing standards; therefore, they should also develop sampling plans for each provision in their standards. However, a larger number of commodity committees are adjourned sine die, and that despite the publication of CXG 50 and the associated information document, the committees lack the expertise to design sampling plans. CCMAS can, therefore, assist in the design of plans but is not in a position to decide on the appropriateness of the consumer's and producer's risks inherent in those plans.	European Union
Sampling plans will often be dependant upon the commodity, but evidence of good practice in sampling should be available from producers/handlers/traders, which could help in defining relevant text to add to CXS-234-1999. For example, ICUMSA has developed Specification and Standards for sampling, sample handling and sample preparation of free-flowing sugars (SPS-10, 2022), sampling, sample handling and sample preparation of liquid sugar products, syrups and molasses (SPS-11, 2022), sampling of crystalline, paste, and liquid sugars for microbiological analysis (SPS-12, 2024), sampling of sugar cane by the full width hatch sampler (SPS-13, 2022) and sampling of sugar cane by the corer method (SPS-14, 2022).	ICUMSA

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
Which is the preferred option: Options 1 and/or 4 (paragraph 13i); if option 4 is preferred, what kind of details should be included in CXS 234 database (or other repository);	
<p>In response to paragraph 13(i) Australia suggests the documentation of Sampling Plan Information should be:</p> <p>Option 1. Include information on sampling plans in Standard 234. However, we seek moderation and suggest (where possible) no more than three sampling plans be assigned per commodity, and (where possible) a similar profile of sampling plans be utilised per commodity group.</p> <p>In response to paragraph 13 (ii & iii)</p> <p>Australia suggests the CX/MAS 26/45/10 Appendix I Annex examples of proposed format looks appropriate, but believe we take into consideration the outcomes for inclusion of the Sampling plan for:</p> <ul style="list-style-type: none"> • CCCF18 AFT and OTA in certain spices which includes Numeric Performance Criteria. • CCASIA23 involving seven existing commodity standards and one draft standard. 	Australia

COMMENT	MEMBER / OBSERVER
<p>Specific Comments</p> <p>1. Inclusion of sampling plan information in Codex standards Brazil supports option 1 - Include information on sampling plans in CXS 234-1999. In our view, this approach offers clarity and usability by consolidating both the method of analysis and the associated sampling provisions within a single reference document.</p> <p>2. Format and content of CXS 234-1999 Regarding the format and content of CXS 234-1999, Brazil considers that further discussion is warranted to define the structure to be adopted and to clarify the essential information to be included, making use of additional examples that allow for a more thorough evaluation of the proposals.</p>	Brazil
<p>El país ratifica la Opción 1 como opción preferida, las principales razones de esta elección teniendo en cuenta las limitaciones de la región y las características del país, son las siguientes: es la opción más user-friendly, su implementación se facilita basándose en una base de datos electrónica ya establecida y permite integrar en un solo instrumento métodos de análisis y planes de muestreo.</p>	Ecuador
<p>We support Option 1: Inclusion of all sampling plan information in CXS 234-1999. Maintaining sampling plans within CXS 234-1999 ensures a single, consolidated reference for methods of analysis and sampling, promotes harmonization across commodities, and avoids fragmentation into multiple commodity-specific standards.</p>	Egypt
<p>The EUMS favour Option 1 (include information on sampling plans in CXS 234) because it would combine sampling plan and testing method information in one document, preferably in an electronic format (preferably searchable database). Nevertheless, a paper version of CXS 234 would still be needed for documentary purposes, which would require keeping the current split in an A part (methods) B part (sampling) in the printed document.</p>	European Union
<p>Indonesia supports Option 4 as the most effective and user-friendly structure for the databasee. Option 4 makes it easier for users to find the information using only the commodity name as a keyword, since all details are displayed in the same row.</p> <p>Furthermore, to ensure the database is comprehensive and serves its intended purpose under Option 4, Indonesia recommends that the data fields include, but not be limited to, the following parameters:</p> <ul style="list-style-type: none"> a. Name of Commodity b. Provision c. Method d. Principle e. Type f. Method of Sampling g. Notes 	Indonesia
<p>Agree for option 1</p>	Iraq

COMMENT	MEMBER / OBSERVER
<p>Japan supports Option 1, as it is the most user-friendly approach and facilitate the identification of the appropriate combination of sampling and analytical methods required for testing.</p> <p>According to the Procedural Manual and previous reports of CCMAS, CXS 234-1999 is intended to serve as a single reference document for all of methods of analysis and sampling for food within the remit of CCMAS.</p> <p>Japan does not agree to split sampling plans into several documents as proposed in Option 4. We would like to recall that CCMAS agreed to assemble all of the methods of analysis from various standards into one standard because compilation of all methods in one document is more user-friendly, e.g. easier to find correct sampling plans. It should be noted that general subject committees have not taken such approach to break one topic into several standards by commodity. Besides CXS 234, General Standard for Food Additives (CXS 192) and General Standard for Contaminants and Toxins in Food and Feed (CXS 193) cover various commodities in one standard, not split into several standards by commodity. Thus, Option 1 is more appropriate and consistent with other Codex standards than Option 4.</p> <p>With regard to database for methods of analysis, it is of utmost importance that the information on the endorsed sampling plan is published timely without errors, regardless of the format (e.g. PDF file, Excel document or online database).</p> <p>As previously explained by the Codex Secretariat and introduced by its technical staff, if the development and public release of a web-based database (similar to the CXL database) remains under consideration, Japan considers that sharing a brief overview of this initiative, along with information on its technical capabilities and limitations, would assist CCMAS in its consideration of this matter and help make a decision on whether to establish an EWG.</p>	<p>Japan</p>
<p>La Comisión Técnica Nacional sobre Métodos de análisis y toma de muestras, toma nota que en el Apéndice I del documento de debate CX/MAS 26/45/10; el GTE abordó inicialmente cuatro (4) opciones de enfoques, los cuales se describen a continuación:</p> <ul style="list-style-type: none"> - Opción 1: incluir información sobre el plan de muestreo en CXS 234-1999, teniendo en cuenta que es necesario revisar el formato actual; - Opción 2: incluir información sobre el plan de muestreo en cada norma individual del Codex; - Opción 3: elaborar una nueva norma para incluir información del plan de muestreo (en paralelo a CXS 234-1999) que sólo contenga información del plan de muestreo y eliminar la Parte B de CXS 234-1999; o - Opción 4: desarrollar una norma para cada grupo de productos que describa los planes de muestreo para ese grupo de productos. <p>Y que el GTE indicó su preferencia por la opción n.º 1 “incluir información sobre el plan de muestreo en CXS 234-1999, teniendo en cuenta que es necesario revisar el formato actual”; no obstante, la opción n.º 4 “elaboración de una norma que describa los planes de muestreo para cada grupo de productos” también recibió apoyo y sigue siendo una opción para su posterior debate.</p> <p>Respecto a ello, la Comisión Técnica Nacional sobre Métodos de análisis y toma de muestras, considera su apoyo a la opción I consistente en “Incluir información sobre el plan de muestreo en CXS 234-1999, teniendo en cuenta que es necesario revisar el formato actual;” esa opción resulta coherente al integrar en un solo documento tanto los métodos de análisis como los planes de muestreo asociados, en lugar de incluirla en tablas separadas permitiendo una aplicación más clara y uniforme. En ese sentido, este enfoque facilitaría tanto el uso práctico de la norma como su mantenimiento y actualización futura.</p>	<p>Peru</p>

COMMENT	MEMBER / OBSERVER
<p>Rwanda would like to appreciate the Electronic Working Group led by New Zealand and co-chaired by Germany. Rwanda prefers option 1 of including information on sampling plans in CXS 234-1999.</p> <p>Rationale: In order to facilitate the interpretation of the standards by the users it is best to have the test method and sampling information in a single document.</p>	Rwanda
<p>If CCMAS is still committed to housing information on endorsed methods and sampling plans in an online database as was proposed at CCMAS40, the United States prefers option 1 to include sampling plan information in CXS 234-1999 as this would facilitate a single location for all information on methods and sampling plans from CCMAS.</p> <p>The United States does not agree with options 3 or 4 as both options introduce another document that would need to be referenced by analysts who are already consulting both CXS 234-1999 and the relevant commodity standards, and would require CCMAS to consult another document when developing a single, unified database.</p>	USA
The way forward (paragraph 13ii) and whether an EWG should be established to define the content and functionality of the database (see paragraph 14).	
In response to paragraph 14, Australia supports the establishment of a new eWG as described.	Australia
<p>Ecuador recomienda como pasos a seguir, confirmar la adopción de la Opción 1, acordar el contenido obligatorio, establecer como se haría uso de la base de datos preexistente, probar la base de datos con información armonizada y definir un mecanismo permanente de mantenimiento. De esta forma el país, secunda la opción establecer un nuevo grupo de trabajo electrónico para definir el contexto de uso de la base de datos, y generar simulacros donde se determine la funcionalidad del sistema.</p>	Ecuador
<p>In line with Option 1, CCMAS should first agree on the minimum information required for each sampling plan entry, including scope, lot definition, sampling type, sample size, acceptance criteria, and links to relevant methods of analysis.</p> <p>We support the establishment of a new EWG to:</p> <ul style="list-style-type: none"> • Define the content and structure of the database; • Ensure proper integration of information from the current CXS 234; • Clarify the functionality of the system (creation, editing, and display of entries); • Provide guidance on inclusion of standard and non-standard information (e.g. footnotes). <p>Clear responsibility for population and maintenance of the database should also be defined</p>	Egypt
The EUMS support the proposal to rationalize the number of plans to the extent possible by forming commodity groups for certain provisions, such as exemplified in the table.	European Union
Indonesia supports the establishment of an EWG to continue discussions to define the content of the proposed database	Indonesia
Yes	Iraq

COMMENT	MEMBER / OBSERVER
La Comisión Técnica Nacional sobre Métodos de análisis y toma de muestras, considera adecuado realizar un formato electrónico estructurado (base de datos) que permita realizar una consulta integrada de planes de muestreo; así como también, la inclusión de parámetros relevantes del plan de muestreo (tipo de plan, tamaño de muestra, riesgos del productor y del consumidor, incertidumbre de medición, entre otros).	Peru
While the United States does not object to an EWG to define the functionality of the database, there does not seem to be a need to define the content, as the content is determined by what is already in CXS 234-1999. Alternatively, the United States is of the view that, rather than establish an EWG, a proposal on the functionality of the database could be developed by a willing member(s) of CCMAS in a discussion paper for CCMAS to consider at a future session.	USA
How CCMAS could assist with the process of developing sampling plans where they do not currently exist (paragraph 13iii)	
El País considera que pueden formar grupos de trabajo que realicen una asistencia técnica directa vía plataformas en línea, que brinde apoyo estadístico especializado, revisión técnica de planes propuestos, plantillas estandarizadas y retroalimentación dirigida a la realidad técnica y social del lugar donde se esté implementando el plan de muestreo.	Ecuador
CCMAS could assist by: <ul style="list-style-type: none"> • Providing general statistical guidance; • Developing harmonized templates; • Reviewing proposed sampling plans for technical soundness; • Identifying priority areas where sampling plans are lacking. This would ensure consistency and scientific robustness while maintaining the coordinating role of CCMAS.	Egypt
The EUMS note that the aspect regarding the responsibility for assessing the parameters that determine the selection of the appropriate sampling plan for a given commodity/provision combination would need further consideration.	European Union
Indonesia recommends that CCMAS assist other committees in developing sampling plans where they are currently absent. This assistance should directly reference and utilize the General Guidelines on Sampling (CXG 50-2004) to ensure a harmonized approach across all Codex standards	Indonesia
Risk analysis and prioritization Creating digital sampling plans	Iraq
La Comisión Técnica Nacional sobre Métodos de análisis y toma de muestras, reconoce que la responsabilidad primaria de elaborar planes de muestreo recae en los comités de producto; sin embargo, considerando que varios de ellos se encuentran suspendidos y que existen limitaciones técnicas para el diseño de planes estadísticamente válidos, se considera pertinente que el CCMAS continúe brindando apoyo técnico y orientación, particularmente en los casos donde actualmente no existen planes de muestreo definidos.	Peru

COMMENT	MEMBER / OBSERVER
<p>The United States believes that the expertise to develop sampling plans rests within the commodity committees and that, should commodity committees require assistance, the General Guidelines on Sampling (CXG 50-2004) and the Information document for the General guidelines on sampling (CXG 50-2004) that CCMAS has updated and developed can be of use. If commodity committees after consulting these guidelines require more assistance, the United States considers that they can request assistance from CCMAS using the existing 'matters referred' mechanisms.</p>	<p>USA</p>