

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3.1, 3.11, 3.2, 4.1, 4.2, 4.3, 5, 7, 8, 9, 10

CRD11

ORIGINAL LANGUAGE ONLY

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

43rd Session
Budapest, Hungary

13 – 18 May 2024

(Comments of Kenya)

Agenda Item 3.1: Endorsement of methods of analysis: CCSCH and CCFO

Position: Kenya supports the recommendations to endorse the listed methods in Appendix I part B and Appendix II.

Justification: The methods are validated and meet the performance criteria as recommended by CCSCH and CCFO respectively.

Agenda Item 3.11: Endorsement of sampling plan: CCCF

Position: Kenya supports the endorsement of the sampling plan as proposed by the codex committee on Contaminants (CCCF17)(REO24/CF) for adoption at step 5/8 by CAC47.

Agenda Item 3.2: Performance criteria for selected processed fruits and vegetables

Position: Kenya appreciates the work done by the United States of America for the development of these performance criteria for the selected processed fruits and vegetables and subsequently;

1. Supports the recommendation to retain the method typing for calcium in the highlighted commodities as it is achievable.
2. Endorses the performance criteria in Appendix I for the selected processed fruits and vegetables since it matches with the National methods used in Kenyan Laboratories.

Agenda Item 4.1: Review of Methods of Analysis in CXS 234: Cereals, Pulses and Legumes Workable Package

Position: Kenya appreciates the work undertaken by the EWG Chair, Canada and supports the endorsement of the proposed changes to CXS 234 as presented in Appendix I of CX/MAS 24/43/4.

Agenda Item 4.2: Review of Methods of Analysis in CXS 234: Fish and Fishery Products Workable Package

Position: Kenya takes note of the proposed recommendations for deletion and replacement of various methods for the fish and fish products as presented in the EWG report on the revision of methods of analysis in the CXS 234(FFP) workable package. However, Kenya at the moment does not offer any suggestions on relevant methods where replacement has been recommended. Most of these methods are being reviewed and feedback will be provided once this review is completed.

Agenda Item 4.3: Review of Methods of Analysis in CXS 234: Fruit Juices Workable Package

Position: Kenya is a major player in fruit juice trade and would like to support re-establishment of the EWG on the workable package fruit juices to revise relevant methods in CXS 234. With advance in technology and trade needs the review is necessary.

Kenya also proposes that a method performance criteria approach should be favored.

Justification: This will give the re-established EWG the autonomy in the selection of important methods that can be given preference in their development.

Agenda Item 5: Information document: *General Guidelines on Sampling (CXG 50-2004)* – e-book with sampling plans applications

Position: Kenya supports the recommendation to re-establish EWG to further develop the information document taking into consideration the draft information document and the questions raised. Further, Kenya supports CCMAS's recommendation for a review of the sampling plans contained in CXS234 as part of further work for the EWG.

Agenda Item 7: Methods of analysis for precautionary allergen labelling

Position: Kenya supports the proposed terminology and definitions in the discussion paper and finds that the discussion paper answers the request from CCFL satisfactorily.

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

Position: Harmonization of names and format for principles identified in CXS 234 (CX/MAS 24/43/10) Paragraph 5-9: Kenya supports the criteria described in this document to name the principles; the proposed version of the harmonized principles presented in Appendix I. This is for the sake of consistency and common understanding.

Further, Kenya supports the establishment of a specific EWG which will provide quick feedback where committee members are unable to travel to continue this work to identify for each provision in CXS 234 the related principle and if there is the principle to be included in the list; and the abbreviation agreed for each principle identified, when necessary for space reasons.

Agenda Item 9: Approach for the placement of nitrogen conversion factors

Kenya appreciates Chile and Brazil for the work done in preparing a discussion paper to explore the best approach for the positioning of nitrogen conversion factors.

General Recommendations

Kenya supports the proposed approach for

- a) placing all conversion factors (Nx) established and agreed by Codex Commodity committees in an annex to CXS 234 for ease of use.
- b) Review the proposed presentations for the conversion factors (Nx) for the Annex specified above, and both retained as tables (Appendix I) and in a list (Appendix II) to facilitate the use of the information.
- c) Recommending that Codex Commodity Committees determine and report to CCMAS the conversion factor (Nx) they have agreed or established, together with all the criteria set in the proposed Annex to CXS 234, to facilitate the endorsement of analytical methods for protein analysis.

Specific Recommendations:

Para 7: Kenya recommends harmonization of the protein name as " CRUDE PROTEIN". This is because it represents the total nitrogen, whether protein or non-protein that is determined in the product tested.

Para 8, 9 10, and 11: Kenya agrees with the proposals for setting specific factors mentioned in the sections for commodities that do not have specified factors for protein calculation. This will facilitate the endorsement of analytical methods for protein analysis.

Para 12: Kenya agrees with the use of two decimal places for nitrogen factor throughout the standard. This is to bring about consistency in the reporting of nitrogen conversion factors.

Para 13: Kenya agrees with the proposal of in the case where the only factor comes from CXS 234-1999, the relevant Commodity Committees should be consulted.

Agenda Item 10: Listing of Type IV methods in CXS 234 when a Type I method is listed for the same commodity and provision

Position: Kenya supports the CCMAS recommendation to re-establish the EWG to develop co-existence or equivalence criteria for Type I and Type IV methods. There are no clear criteria as to when and how the Type I and Type IV methods can co-exist. In practice, however, such methods co-exist in the international field.

Kenya supports the recommendation to continue with the selection of Type IV methods on a case-by-case basis when a 'justifiable and motivating reason' is provided until appropriate selection criteria are developed.