

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, 5, 7, 9, 10

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

43rd Session
Budapest, Hungary

13 – 18 May 2024

(Comments of Thailand)

Agenda Item 3.1: Endorsement of methods of analysis and sampling plans for provisions in Codex standards

We wish to express our appreciation for the effort of preparing the document for “Endorsement of Methods of Analysis and Sampling Plans for Provisions in Codex Standards” (CX/MAS 24/43/3 April 2024) for consideration.

Our comments on this matter are as follows:

General comments

1. Implementation of the method performance criteria approach in Codex

We have no objection with the implementation of the method performance criteria approach in Codex. However, we have an observation in case that methods complying with performance criteria are used to resolve the disputes, then it is not in accordance with the definition of Type II method in Codex Procedural Manual which states “It should be recommended for use in cases of dispute”.

2. Endorsement of Methods of Analysis for provisions in Codex Standards

In principle, we have no objection with the proposed methods of analysis for Committee on Spices and Culinary Herbs (CCSCH) and Codex Committee on Fats and Oils (CCFO) in Appendix I, Part B and Appendix II respectively.

Specific comments

We have comments on specific methods of analysis for CCSCH as listed below:

1. Methods of analysis for Spices and Culinary Herbs commodities

In general, the proposed methods in Appendix I, Part B have inconsistency in provisions and principles such as:

provision	- “Acid Insoluble Ash, on dry basis” and “Acid-insoluble on dry basis” - “Mammalian or/and Other excreta” and “Mammalian and other excreta”
principle	“Visual examination followed by gravimetry” and “Visual examination”

2. Methods of analysis for Draft Standard for spices derived from dried or dehydrated fruits and berries – small cardamom

IS 1907 method (Principle: Visual examination followed by gravimetry) should be endorsed as Type I, while its validation data should be submitted for consideration. However, we have an observation that it is a national method, whether it can be adopted as an international recognized method.

Agenda Item 3.11: Endorsement of the sampling plan for methylmercury in fish

Thailand appreciates the efforts for preparing a document for “Endorsement of the sampling plan for methylmercury in fish” for consideration.

We have no objection for a sampling plan for methylmercury in fish as proposed in Appendix I. However, we have an observation that the definition of “decision rule” is defined in the proposed sampling plan, while it is absent in other sampling plans in General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995).

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

We wish to express our appreciation for the effort of preparing the document for “Endorsement of Methods of Analysis and Sampling Plans for Provisions in Codex Standards - Performance Criteria for Selected Processed Fruits and Vegetables” (CX/MAS 24/43/3 Add.2, April 2024) for consideration.

1. We have no objection with the Performance Criteria for Selected Processed Fruits and Vegetables presented in Appendix.
2. We agree to retain endorsing methods with typing for the determination of calcium containing food additives for preserved tomatoes, canned citrus fruits, certain canned vegetables, and citrus marmalade, as the Performance Criteria cannot be set for these additives which have no Maximum Limits.

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

We appreciate the continued effort of Electronic Working Group (led by Canada) for preparing the document for “Review of methods of analysis in CXS 234: Cereal, Pulses and Legumes and derived products Workable Package (CX/MAS 23/43/4, March 2024) for consideration of the meeting. Our comments on this matter are as the followings.

General Comments

We have no objection with the proposed changes for methods of analysis, provisions and principles as shown in Appendix I.

Specific Comments

1. Determination of ash content for Degermed maize (corn) meal and maize (corn) grits, Sorghum flour, Sorghum grains, Wheat flour and Whole maize (corn) meal

The provision “ash” should be retained as it is. It should not be separated into two different provisions depending on the different temperature used in the ash determination, including “ash- 500” or “ash-900”. The temperature used in determining ash should be included in the principle.

2. Determination of Protein for Quinoa

If it is agreed to change the provision from “Protein (N x 6.25 in dry weight basis)” to “Protein”, the texts “N x 6.25 in dry weight basis” should be described in the principle.

3. Determination of Crude Protein for Soy protein products

The principle of the method of analysis should not be changed to “Gravimetry (Combustion)”, since “Combustion” is a preparatory step before using Kjeldahl method for protein determination, not a principle “Gravimetry”.

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

We wish to express our gratitude for the effort of Electronic Working Group (led by Norway) for preparing the document for “Review of methods of analysis in CXS 234: Fish and Fishery Products Workable Package (CX/MAS 24/43/5, February 2024) for consideration of the meeting. Our comments on this matter are as the followings.

General Comments

1. We have no objection with the proposed revisions for methods of analysis, provisions and principles as presented in Appendix I
2. Implementation of the method performance criteria approach in Codex

We have no objection with the implementation of the method performance criteria approach in Codex. However, we have an observation in case that methods complying with performance criteria are used to resolve the disputes, then it is not in accordance with the definition of Type II method in Codex Procedural Manual which states “It should be recommended for use in cases of dispute”.

Specific Comments

1. We agree with the Method Performance Criteria for determination of histamine for fish and fishery products and determination of biotoxins in live and raw bivalve molluscs as proposed in Appendix I.
2. Standard for Salted Atlantic Herring and Salted Sprat (CXS 244) and Standard for Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes (CXS 167)
 - 2.1 We support to change the provision “water content” to “water content determined as moisture” for CXS 244 and the provision “Salt Content Water content” to “Moisture content (in the determination of % salt saturation)” for CXS 167
 - 2.2 We prefer to use AOAC 950.46B, option (a), 16-18 h at 100-102°C for both products, as it is appropriate for the products containing high salt level.
3. Standard for quick-frozen raw scallop products–block-frozen products (CXS 315)
AOAC 967.13 should be chosen for determining drained weight, as it is appropriate for the products in this standard.
4. Standard for Quick Frozen Fish Fillets (CXS 190) and Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CXS 166)
For greater clarity, we support to change the provision “gelatinous conditions” to “Gelatinous Condition Determined as Moisture”.

Agenda Item 5: Information Document: the *General Guidelines on Sampling (CXG 50–2004)*

We wish to express our gratitude for the effort of Electronic Working Group (led by New Zealand) for preparing Information Document: The General Guidelines on Sampling (CXG 50–2004) (CX/MAS 24/43/, March 2024) for consideration.

We have no objection with the Proposed draft Information Document for the CXG 50-2004 in Appendix I, while our addition comments are as the followings.

2. Inclusion of matters and Bayesian approaches in the Proposed draft Information Document

We support to include proposed matters in the information document which are relevant new science and real-life practical examples based on commodity standards. Meanwhile, it is too early to include Bayesian approaches in the information document at this stage as the revised CXG 50, focusing on sampling plans which consumer and producer risks are controlled, was recently adopted in 2023, Codex member countries and commodity committees need sufficient time to thoroughly learn the current CXG 50 with information documents reflecting its content and try to implement the existing guidance and applications for designing their sampling plans.

3. We agree with the revision of the sampling plans contained in CXS 234 as further work.

Agenda Item 7: Methods of analysis for precautionary allergen labelling

We wish to express our gratitude for the effort of Electronic Working Group (led by United States of America) for preparing a discussion paper for “Methods of Analysis for Precautionary Allergen Labelling (CX/MAS 24/43/9, April 2024) for consideration.

Our comments on this matter include:

1. In principle, we have no objection with the Discussion Paper on Methods of Analysis for Precautionary Allergen Labeling in Appendix I. And, for greater understanding and clarity, the document should provide more comprehensive information.
2. The definitions used in the document should refer to those determined by recognized international organizations.

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

We wish to express our gratitude for the effort of Chile and Brazil for preparing the document for Approach for the Placement of Nitrogen Conversion Factors (CX/MAS 24/43/11, March 2024) for consideration.

Our comments on this matter are as the followings:

General comments

1. We support to place all conversion factors (Nx) established and agreed by Codex Commodity Committees in an annex to CXS 234 with a table format as presented Appendix I for ease of use.
2. We agree with conversion factors (Nx) for commodities as proposed in Appendix I.

3. Codex Commodity Committees should determine and report to CCMAS their established conversion factor (Nx), together with the criteria set in the proposed Annex to CXS 234 to facilitate the endorsement of analytical methods for protein analysis.

Specific comments

In addition, we agree to elaborate/retain conversion factors (Nx) for specific commodities as follows:

1. to elaborate conversion factors (Nx) for infant formula = 6.25, protein in other milk product = 6.38 and other soy product =5.71
2. to retain conversion factors (Nx) for milk products = 6.38, as there is not a mixture of protein source in the commodities
3. to elaborate conversion factors (Nx) for Cooked cured pork shoulder and Dried meat = 6.25, since the major protein source of these products is meat
4. We agree with the recommendation for commodities and specific committees, including:
 - 4.1 Tehena (CCNE) (Regional Standard for Tehena -CXS 259R-21007) – to use factor of 5.71 as product made from sesame seed and vegetal protein.
 - 4.2 Tempe (CCASIA) (Regional Standard for Tempe -CXS 313R-2013) - to use factor of 5.71.

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

Thailand appreciates the efforts of EWG (chaired by Uruguay and co-chaired by Brazil) for preparing a “Discussion paper on Listing of Type IV methods in CXS 234 when a Type I method is listed for the same commodity and provision (second draft)” for consideration.

Our comments on this matter are as follows:

1. The selection of type IV methods when a Type I method is listed for the same commodity and provision should be considered on a case-by-case basis with a justifiable and motivating reason, until the criteria for the co-existence of Type I and IV methods is established and approved.
2. Metrological Traceability of Measurement Results should be taken into account in the elaboration of criteria for equivalency of Type I and Type IV method.