

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3.1, 3.2, 4.1, 4.2, 5, 8, 9, 10

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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 Ghana)

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

POSITION: Ghana supports the recommendation to endorse the methods listed in Appendix I Part B

RATIONALE: The method is validated and meets performance criteria.

SECTION: Appendix II

POSITION: Ghana supports the recommendation to endorse the listed methods in Appendix II

RATIONALE: The method is validated and meets performance criteria.

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

POSITION: Ghana supports the recommendation to retain the method typing for calcium.

RATIONALE: There was a recommendation to either retain the method typing (Type IV) for calcium determination in these commodities or allow the establishment of numeric performance criteria for the calcium methods (Type III) for these commodities as indicated in Appendix I.

However, per the document, CX/MAS 24/43/3, calcium-containing additives are generally permitted for use at GMP levels. And that, because GMP use level is not a set concentration, numeric performance criteria cannot be set for these provisions which include calcium.

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

SECTION: Appendix I (Ash content for degermed maize)

POSITION: Ghana endorses the recommendation to allow for the two temperatures for ash determination globally.

RATIONALE: The determination of ash content at 900°C requires the use of expensive platinum dishes which are not readily available. However, methods of analysis with temperature of 550°C has been found to be fit for purpose. The two temperatures can be considered as long as from the validation studies the performance data are not significantly different from each other.

Ghana uses method of analysis which requires a temperature of 550°C which has been found to be fit for purpose.

SECTION: Appendix I (Ash determination for sorghum flour and whole maize(corn))

POSITION: Ghana recommends that the test methods ISO 712 and ICC 110/1 should be deleted.

RATIONALE: The test methods are for moisture determination and the scopes do not include ash determination.

SECTION: Appendix I (Ash content in sorghum grains)

POSITION: Ghana recommends that the method ISO 6540 be deleted.

RATIONALE: The method is for moisture content in maize and does not apply to ash.

SECTION: Appendix I (Fat content in soy protein products)

POSITION: Ghana recommends that the method (ISO 11085) proposed by an EWG member be deleted.

RATIONALE: The method does not apply to oilseeds

Agenda Item 4.2: Review of Methods of Analysis in CXS 234: Fish and Fishery Products Workable Package**SECTION: Appendix I (Histamine in fish and fishery products)**

POSITION: Ghana supports the recommendation to delete AOAC 977.13 and proposes a replacement method for histamine analysis such as the use of HPLC. High Performance Liquid Chromatography & Diode Array Detector (DAD) can be used for histamine analysis in fish and fishery products.

RATIONALE: A common method for histamine analysis in fish and fishery products would produce comparable and consistent results which will help facilitate trade.

SECTION: Appendix I (Mercury in fish and fishery products)

POSITION: Ghana supports the recommendation to delete AOAC 977.15 and also proposes that an alternative method for mercury in fish and fishery products be identified

such as BS EN 13806:2002 which uses mercury hydride generator, Atomic Absorption Spectrometer.

RATIONALE: Ghana uses BS EN 13806:2002 and the method meets the performance criteria.

SECTION: Performance Criteria for methods of analysis of methylmercury table

POSITION: Ghana recommends that the method, AOAC 988.11 for methylmercury analysis in fishery and fishery products be deleted

RATIONALE: It involves the use of a harmful chemical, toluene.

SECTION: Appendix 1 – No. 12 (NaCl in fish sauce)

POSITION: AOAC 937.13 should be replaced with AOAC 937.09

RATIONALE: AOAC 937.13 is for mold in butter.

Agenda Item 5: Information document: *General Guidelines on Sampling (CXG 50-2004)***SECTION: Paragraph 9 - recommendations**

POSITION: Ghana supports the recommendation to re-establish EWG to further develop the information document taking into consideration the draft information document and the questions raised.

Ghana also supports CCMAS's recommendation for a review of the sampling plans contained in CXS 234 as part of the further work of the EWG.

Agenda Item 8: Harmonization of names and format for principles identified in CXS 234**SECTION: Paragraph 5-9**

POSITION: Ghana approves the criteria described in this document to name the principles; the proposed version of the harmonized principles presented in Appendix I

RATIONALE: For the sake of consistency

Agenda Item 9: Approach for the placement of nitrogen conversion factors**SECTION: Paragraph 7**

POSITION: Ghana recommends for the harmonisation of protein name as "PROTEIN CONTENT".

RATIONALE: In the current version of CXS 234-1999, the provision is mentioned as Protein, Protein Crude, Protein content and Milk protein.

There should be consistency in the provision name.

SECTION: Appendix 1

POSITION: Ghana agrees with the proposed factors as indicated in Appendix 1 and these factors should be in two (2) decimal places for clarity and uniformity and supports the recommendation to centralize all the information in an Annex to CXS 234 for ease of use.

In addition, Ghana endorses 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.

SECTION: 8, 9, 10 and 11

POSITION: Ghana agrees with the proposals for setting specific factors mentioned in the sections for commodities that do not have specified factor for protein calculation.

RATIONALE: This will facilitate the endorsement of analytical methods for protein analysis.

SECTION: 12

POSITION: Ghana agrees with the use of two decimal places for nitrogen factor throughout the standard.

RATIONALE: In the document there is no consistency in the reporting of nitrogen conversion factors. A mixture of different decimal places for values (1 or 2 decimal places) are being used, a consistent scientific way of reporting has to be adopted.

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: Ghana supports CCMAS recommendation to re-establish the EWG to develop co-existence or equivalence criteria for Type I and Type IV methods.

Ghana also 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.

RATIONALE: 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.