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 Item 7 **MAS/39 CRD/14**

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON METHODS OF ANALYSIS SAMPLING

Thirty-ninth Session
Budapest, Hungary, 7 – 11 May 2018

PROPOSAL TO AMEND THE GENERAL GUIDELINES ON SAMPLING (CXG 50 -2004)

(Comments submitted by United Kingdom)

UNITED KINGDOM

The UK congratulates the New Zealand delegation leading the e-Working Group on Sampling for the work they have done on this complex subject. We welcome the development of the development of a standardised software tool and thank the NZ delegation for demonstrating it.
We provide some comments for the consideration of CCMAS

i) In taking the decision to update GL50 the Codex Secretariat considered the revision should aim at providing a simple and understandable guidance.
We agree that this work is necessary and very important. However, it is not simple to calculate minimum sample size for flexible lot sizes and variable consumer/producer risks, and the inclusion of measurement uncertainty will only lead to a more challenging document. We believe the simplicity and clarity of objectives cannot be met in a documentary standard at the same time as incorporating measurement uncertainty so it is our view that the inclusion of measurement uncertainty should be removed from the scope of this work.

ii) We note that software tools need to be widely accepted, easy to implement for developing economies, and properly documented, validated and maintained, we welcome the use of open source, free-to-use tools such as R. We further recommend that open source practices be employed throughout code development and documentation so that code can be readily inspected and checked by any user or CODEX member. We do, however, note that while tools such as Shiny provide for a viable web-based tool, this in turn requires server-side implementation expertise and we suggest that consideration be given to the continued support of such a tool for reference purposes by Codex.

iii) In addition to the need for open source practices and platforms, we note that concepts such as operating characteristic curves are hard for most producers and enforcement agency members to grasp. We suggest that output needs clear with interpretive warnings -that are not readily interpreted by most potential users.

iv) We welcome the inclusion of sampling schemes that allow for the effect of experience on consumer/producer risk and support its inclusion in the project.

vi) Although we feel that is unrealistic to incorporate measurement uncertainty into the current project on sampling plans, we suggest that CCMAS initiates a discussion on how the effect of measurement uncertainty on risk and sample size may be addressed.