

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

CRD03

ORIGINAL LANGUAGE ONLY

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

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REVISION OF THE GENERAL GUIDELINES ON SAMPLING (CXG 50-2004) (REVISED)

(Prepared by Electronic Working Group chaired by New Zealand)

[1] For background information, please see [CL 2023/15/OCS-MAS](#)

[2]

[3] Revised *General Guidelines on Sampling (CXG 50-2004) including Appendix I (Guide to the Selection and Design of Sampling plans) and Appendix II (ISO Inspection Plans)*

[4] (Analysis and replies to the comments submitted to the CL are presented in the Annex at the end of this CRD)

1 [5] Reference Guidelines

1.1 [6] Introduction

[7] The Guidelines are primarily intended for use by Codex commodity committees responsible for developing acceptance sampling plans for provisions in Codex standards, and by governments responsible for import or export inspection of foods to describe the design and evaluation of sampling plans for the international trade of food commodities.

[8] Foods are frequently sampled, throughout the food supply chain from producers to consumers, for the purpose of checking their quality. Clear definition of sampling plans is an integral part of specifications for the sampling and testing of foods. Sampling plans are included in Codex standards and may be used by governments in standards for foods.

[9] Codex sampling plans, in conjunction with methods of analysis, are intended as a means of verifying that foods comply with provisions relating to composition, chemical or microbiological contaminants or pesticide residues contained in Codex standards.

[10] Sampling therefore plays an important role in achieving the Codex objectives of protecting consumers' health and ensuring fair practices in the food trade. Codex sampling plans also have an important role in harmonizing technical approaches to sampling and by results of analysis interpretation in relation to lots or consignments of foods, in the light of the relevant provision(s) of the applicable Codex standard.

[11] It is important that sampling be undertaken in a way that contributes to these objectives.

[12] Specification of these quality objectives, the quality level acceptable to the customer and the rate of acceptance of compliant products, enables the development of sampling plans.

[13] A Codex standard may set out a specific sampling plan for a particular context, or it may specify the outcome to be achieved by a sampling plan.

[14] Although these Guidelines provide a generic approach to the design of sampling plans, Codex sampling plans are intended primarily for inspection of foods upon receipt, for example by importing country regulatory agencies, and might not be suitable for use by producers. However, a clear definition of quality objectives in Codex standards will allow producers to devise appropriate control and inspection procedures to achieve them.

Commented [I1]: Comment (85) by Iraq (31 May 2023 7:58) agree with no comments. regards

Commented [SM2R1]: Noted. Thank you.

Commented [I3]: Comment (4) by Australia (22 May 2023 1:11)

NMI would like to thank New Zealand and Germany for their continued efforts and development of the Revised General Guidelines on Sampling (CXG 50-2004) including Appendix I (Guide to the Selection and Design of Sampling plans) and Appendix II (ISO Inspection Plans) (at Step 6).

Commented [SM4R3]: Noted. Thank you.

Commented [A5]: Comment (5) by Australia (22 May 2023 1:13)

1. Compared to the 'Revised General Guidelines on Sampling (CXG 50-2004); Part II – Reference Document' distributed to the EWG June 2022, the 'Revised General Guidelines on Sampling (CXG 50-2004) including Appendix I (Guide to the Selection and Design of Sampling plans) and Appendix II (ISO Inspection Plans) (at Step 6)' has undergone some substantial and key revisions.

2. We particularly support the inclusion of a discussion on ISO Sampling Plans; the distinction of Acceptance Sampling versus Conformity Assessment; the distinction between analytical measurement uncertainty and the sampling component of (the total) measurement uncertainty; and linkage of the 'Reinspection' with the 'The Guidelines for Settling Disputes on Analytical (Test) Results (CXG 70-2009), plus removal of information on 'retesting'.

3. We thus believe this latest revised CXG 50 could advance to Step 8.

Commented [SM6R5]: Noted. Thank you.

Commented [A7]: Comment (3) by Egypt (18 May 2023 13:08)

Egypt agrees on the proposed draft & recommends the following notes:

- Referring to examples of isolated lots, and a series of continuous lots, as mentioned in the old version of CXG 50 - 2004 , as the aforementioned examples were deleted when reviewing the project, in order to facilitate the implementation .
- Review table numbers mentioned in the project.
- Providing the project with the item on the decision-making tree, as stated in the old version of the specification.

Commented [RK8R7]: The old version of CXG50 was based on the ISO plans that, as explained, are not the most general as they do not allow explicit control of both producer's and consumer's risks.

The distinction between plans for a continuing series of lots and those for isolated lots is an outcome of the way the ISO plans have been designed; this distinction does not apply to the methodology presented in CXG50 where both PR and CR are specified in the design.

Appendix 1 is intended to simplify the decision making 'tool' (tree) in 2.5.1.4 in the old version for the selection of sampling plans

Commented [B9]: Proposed Change (59) by Brazil (24 May 2023 15:01)

We suggest redrafting the fourth paragraph as following:

"Sampling therefore plays an important role in achieving the Codex objectives of protecting consumers' health and ensuring fair practices in the food trade. Codex sampling plans also have an important role in harmonizing technical approaches to sampling and by results of analysis interpretation in relation to lots or

... [1]

Commented [SM10R9]: Agree

1.2 [15]Scope

[16]In these Guidelines, the focus is on acceptance sampling plans for the inspection of isolated homogeneous lots, in which the risks to consumers and producers are controlled. Additionally, there are some guidelines for sampling inhomogeneous lots.

[17]The term 'isolated' means that the inspection of each lot is done in isolation, without considering the outcome of the inspection of adjacent lots or, for example, other lots from the same producer. This does not mean that information from previous inspections cannot be used; in particular, there are cases where the lot standard deviation may be known from the inspection of previous lots.

[18]The following situations are covered:

- [19]acceptance sampling plans for the control of the percentage nonconforming for homogeneous lots by attributes or by variables, for goods in bulk or individual items
- [20]inspection by variables sampling plans for normally distributed characteristics
- [21]adjustment for measurement uncertainty in cases where it is non-negligible as compared to the lot standard deviation with a focus on cases where the measurement uncertainty is normally distributed.
- [22]sampling plans for the control of the average content
- [23]in addition, some information is provided on issues involved with the design of plans for bulk materials.

[24]In section 2, general concepts which are relevant for the sampling of foods are defined, sections 3, 4 and 5 cover acceptance sampling plans for different situations of statistical food control. Section 6 covers other matters such as physical sampling, reinspection, and inhomogeneous lots.

[25]Appendix I contains a step-by-step guide for the selection of sampling plans. Appendix II contains tables of ISO¹ attributes and variables plans indexed by producer's risk.

[27]These Guidelines are not intended to be comprehensive; these Guidelines do not provide information on all types of sampling plan options that may be available. Sampling plans from other sources are still acceptable subject to their endorsement by the Codex Committee of Methods of Analysis and Sampling (CCMAS).

[28]Note: In CXG 50, acceptance sampling plans may be referred to as 'sampling plans' or 'plans', and acceptance sampling inspection may be referred to as 'sampling inspection' or 'inspection'.

1.3 [29]Definitions

[30]For the terms commonly used in these Guidelines the following definitions are provided, in addition to those in the Guidelines on Analytical Terminology (CXG 72-2009).

[31]Note: In some of the definitions, reference is made to the process standard deviation or the process quality level. In CXG 50, the focus lies on lots rather than processes. For this reason, the relevant quantities in CXG 50 are the lot standard deviation and the lot quality level.

[32]Acceptance criterion

[33]Acceptance criterion is used to cover terms such as acceptance and rejection numbers for attributes plans and acceptability constants for variables plans.

[34][SOURCE: ISO 3534:2]

[35]Note: In CXG 50 the term 'acceptance criterion' is used to describe the rule which is applied to the test results obtained during the lot inspection in the decision whether to accept the lot.

[36]Acceptance sampling

[37]Sampling after which decisions are made to accept a lot, or other grouping of products, materials, or services, based on sample results.

[38][SOURCE: ISO 3534:2]

[26]¹ The International Organization for Standardization

Commented [B11]: Proposed Change (60) by Brazil (24 May 2023 15:05)

In the first paragraph of the scope, we suggest including a sentence as read below.

"In these Guidelines, the focus is on acceptance sampling plans for the inspection of isolated homogeneous lots, in which the risks to consumers and producers are controlled. Additionally, there are some guidelines for sampling inhomogeneous lots."

We also suggest moving the last paragraphs of the scope, from "the following situations are covered by these guidelines" to the "note", which list the situations covered by the guidelines, to the introduction section. Another option would be including these situations in a table of contents.

Commented [RK12R11]: NZ considers that the current structure could be retained as the purpose of the scope is to describe what is covered or not covered in the document

Commented [J13]: Proposed Change (14) by Japan (22 May 2023 1:55)

Japan proposes to delete "reinspection". Reinspection is not a part of sampling or statistical consideration, but may be necessary when parties involving import and export enter dispute over the analytical results. Thus, it is important to avoid duplication of work and inconsistency with other Codex texts, especially CXG70.

Commented [RK14R13]: NZ considers that this section could be retained.

CXG70 covers only disputes arising from the disagreement of test results using arbitration by a third laboratory. There are other possible causes of disputes as mentioned in the footnote on p1 of CXG70 for which CXG70 is not appropriate:

It is recognized that disputes may arise from other cause(s), which should also be investigated... Possible reasons for disagreement may include one or several causes such as:

-The existence, appropriateness and statistical validity of the sampling plan used to assess the product; ... [2]

Commented [B15]: Comment (61) by Brazil (24 May 2023 15:07)

We note that the document contains definitions for terms throughout the text and not just in section 1.3. In this regard, we suggest including all definitions in a single section and aligning them with existing definitions in other Codex documents, to avoid inconsistencies and contradictions. Otherwise, it would be necessary to perform an extensive review in the Codex Standards. For ... [4]

Commented [RK16R15]: We didn't want to create confusion by including the specific definitions relating to bulk materials in 1.3.

In Section 4.4.3 we note that the terminology relating to sampling of bulk materials varies widely among authors and subject areas (e.g. minerals versus grains) and gives those definitions as an example. ... [3]

Commented [J17]: Comment (15) by Japan (22 May 2023 1:56)

"Sampling plan", "sampling procedure" and "sampling methods" have already used in other Codex documents and important terms in relation to sampling. For consistency with other Codex texts, it is important to make sure their definitions should be consistent with those in other Codex and/or relevant international technical documents (e.g. ISO) to avoid unnecessary confusion to readers.

Commented [RK18R17]: We didn't want to create confusion by including the specific definitions relating to bulk materials in 1.3.

In Section 4.4.3 we note that the terminology relating to sampling of bulk materials varies widely among authors and subject areas (e.g. minerals versus grains) and gives those definitions as an example. ... [5]

[39]Acceptance sampling plan

[40]Plan which states the sample size(s) to be used and the associated criteria for lot acceptance.

[41][SOURCE: ISO 3534:2]

[42]Acceptance sampling by attributes

[43]Acceptance sampling inspection whereby the presence or absence of one or more specified characteristics of each item in a sample is observed to establish statistically the acceptability of a lot or process.

[44][SOURCE: ISO 3534:2]

[45]Acceptance sampling by variables

[46]Acceptance sampling inspection in which the acceptability of a process is determined statistically from measurements on specified quality characteristics of each item in a sample from a lot.

[47][SOURCE: ISO 3534:2]

Conformity assessment

Activity to determine whether specified requirements relating to a product, process, system or person or body are fulfilled.

[Source ISO 17000:2004 2.1]

Consignment

A quantity of some commodity delivered at one time. It may consist of either a portion of a lot, or a set of several lots.

However in the case of statistical inspection, the consignment shall be considered as a new lot for the interpretation of the results.

- If a consignment is a portion of a lot, the consignment shall be considered as a lot for the inspection.
- If the consignment is a set of several lots, before any inspection care shall be given to the homogeneity of the consignment. If not homogeneous, a stratified sample may be used.

[48]Consumer and producer

[49]The terms 'consumer' and 'producer' are conventional and may apply to a range of different operators in the food supply chain, such as a grower, manufacturer, the manufacturer's own quality control system, supplier, exporting country, processor, on-seller, or importing country. In general, 'producer' refers to a supplier or seller of foodstuffs and 'consumer' to an importing country regulator, a purchaser, or an actual consumer of those foods.

[50]Consumer's risk (CR)

[51]Probability of acceptance when the quality level of the process has a value stated by the acceptance sampling plan as unsatisfactory.

[52][SOURCE: ISO 3534:2]

[53]Consumer's risk quality (CRQ)

[54]Quality level of a lot or process which, in the acceptance sampling plan, corresponds to a specified consumer's risk.

[55][SOURCE: ISO 3534:2]

[56]Note: The CRQ corresponds to the LQL in the ISO 2859 and ISO 3951 standards.

Commented [RK19]: Thailand

Indifference quality level

quality level which, in the acceptance sampling nplan, corresponds to a probability of acceptance of 0.5 when a continuing series of lots is considered.

[Source ISO 3534-2:2006]

[57]Lot

[58]A quantity of product produced under conditions presumed uniform.

[59][SOURCE: ISO 3534:2]

[60]Operating characteristic curve

[61]Curve showing the relationship between probability of acceptance of product and the incoming quality level for given acceptance sampling plan.

[62][SOURCE: ISO 3534:2]

[63]Producer's risk (PR)

[64]Probability of non-acceptance when the quality level of the process has a value stated by the plan as acceptable.

[65][SOURCE: ISO 3534:2]

[66]Producer's risk quality (PRQ)

[67]Quality level of a lot or process which, in the acceptance sampling plan, corresponds to a specified producer's risk.

[68][SOURCE: ISO 3534:2]

[69]Note: The PRQ corresponds to the AQL in the ISO 2859 and ISO 3951 standards.

[70]Quality level

[71]Quality expressed as a rate of nonconforming units or rate of number of nonconformities.

[72][SOURCE: ISO 3534:2]

[73]Note: In CXG 50, the quality level of a given lot is often expressed in terms of the percentage of nonconforming items.

[74]Sample

[75]One or more items taken from a population and intended to provide information on the population and possibly serve as a basis for a decision on the population or on the process which had produced it.

[76][SOURCE: ISO 3534]

507]A **laboratory sample** is a sample as prepared (from the lot) for sending to the laboratory and intended for inspection or testing.

2 [77]Acceptance Sampling – General Principles**2.1 [78]Reasons for Sampling**

[79]While various measures such as Hazard Analysis and Critical Control Point systems (HACCP), Good Manufacturing Practice (GMP), process control and sampling are available to producers to provide assurance about the quality of products they supply, consumers usually rely on acceptance sampling if they wish to verify the quality of incoming products.

[80]Acceptance sampling procedures are used when goods are transferred between two parties. The purpose of these procedures is to provide unambiguous rules for releasing a product after inspection

Commented [J20]: Comment (42) by Japan (22 May 2023 2:19)

This definition should be moved to definition section.

Commented [SM21R20]: Agree.

Noting there are times when a definition should be retained in the text.

of only a limited sample. Both parties should be fully aware of the limitations and risks associated with using such procedures and therefore most acceptance sampling procedures should include provisions for dealing with disputes and non-conforming items found in lots that have been accepted by the sampling plan.

[81] An acceptance sampling plan specifies the number of samples to be taken and how they are to be taken, the procedure used to test or examine those samples, and the acceptance criterion, based on the results from the testing of those samples, used to decide whether a lot should be accepted.

[82] In general acceptance sampling is used to:

- [83] reduce costs
- [84] allow product assessment when tests are destructive
- [85] enable faster decision making.

2.2 [86] Approaches to Acceptance Sampling

[87] There are three possible approaches to acceptance sampling:

- (a) [88] 100 % inspection, involving inspection of the entire (i.e., 100 %) lot
- (b) [89] Sampling based on statistical principles
- (c) [90] *Ad hoc* inspection, i.e., sampling plans without a statistical basis.

[91] The risks and costs associated with each of these three options will be briefly discussed.

[92] Approach (a) is usually not feasible due to the prohibitive cost of testing and in addition, there might not be any product left to sell if the inspection method necessitates destructive testing.

[93] Approach (b) has the disadvantage of higher risks as compared to approach (a), since a part of the lot is not inspected. However, by applying an approach based on statistical principles, the risks can be calculated, and a sampling plan can be chosen that ensures these risks are controlled to desired levels. It also has the advantage of practicability and lower costs.

[94] In lot inspection, there are two types of risks:

- [95] acceptance of a lot of unsatisfactory quality (consumer's risk)
- [96] rejection of a lot of acceptable quality (producer's risk).

[97] Sampling plans should be designed to control these risks to suitable levels, whereby suitable risk levels are determined based on fitness for purpose considerations.

[98] Approach (c) is not recommended. It may be used for practical reasons, such as limited resources, or for simplicity. However, such plans might not provide the expected level of assurance of food quality and may inadvertently impose high costs, for instance through unwarranted acceptance of food that could lead to illness or unjustified rejection that, in turn, could lead to the imposition of fines, penalties or trade sanctions. The risks associated with such plans should be evaluated where possible. Decisions on acceptance or rejection should not be made solely based on these plans except by mutual agreement of the consumer and producer with an understanding of the risks involved.

[99] In summary, approach (b) allows for practicability while ensuring that risks are controlled to levels considered appropriate based on fitness for purpose considerations.

2.2.1 [100] Acceptance sampling versus conformity assessment

[101] Acceptance sampling and conformity assessment do not have the same purpose. Conformity assessment is the use of a single measurement result to decide whether a single item conforms to a limit. Acceptance sampling is the process in which a sample² is taken from a lot and involves the determination of acceptance criteria and sample size to decide whether a lot is accepted or rejected.

[103] The broadest definition of conformity assessment may be considered to include acceptance sampling. However, in a narrower sense, conformity assessment can be understood to refer specifically to the situation where a one single measurement result is used to decide if one single item of interest conforms to a specified requirement. If conformity assessment is understood in this narrower sense,

[102]² Refer to the definition in section 1.3.

Commented [J22]: Proposed Change (47) by Japan (23 May 2023 7:01)

“Sampling” in this text conflicts with “sampling” defined in Section 2. In addition, since Codex has already developed guidelines related to trade dispute caused by analytical results (CXG 70), it is not necessary to refer to “trade dispute” in this guideline, considering trade dispute related to analytical value may be caused not only by sampling procedure but also by other factors. We propose to delete texts after “and therefore most...”.

Commented [RK23R22]: NZ considers that the current text could be retained.

The term “Acceptance sampling”, is already defined in 1.3. This paragraph is a direct quotation from Holst et al – it says that any agreement on sampling plans should also include provisions on the resolution of disputes; this text is not suggesting how disputes relating to analytical differences or other causes should be resolved.

CXG70 covers only disputes arising from the disagreement of test results using arbitration by a third laboratory. There are other possible causes of disputes as mentioned in the footnote on p1 of CXG70 for which CXG70 is not appropriate. Reinspection can be used for these other cases, but could also be used for disputes relating to the disagreement of results.

Not all disputes are due to analytical differences; CXG 50 includes re-inspection as it is appropriate for acceptance sampling where the dispute is not due to analytical differences.

Commented [J24]: Comment (17) by Japan (22 May 2023 1:57)

In this text, methods of analysis should be selected based on sampling plans, which is not the current practice of endorsement in CCMAS. To change the procedure, discussion at the CCMAS plenary is necessary. Japan would like to flag up the point to other delegations.

Commented [RK25R24]:

1. The text says that the complete specification of the acceptance sampling plan should include how the samples are tested.
2. Section 5 talks about how the sampling plan is adjusted to allow for the MU inherent in the test method.

Commented [J26]: Proposed Change (18) by Japan (22 May 2023 1:58)

These guidelines are to be established to help governments and commodity committees elaborating feasible, suitable sampling plan. As it is necessary under a certain situation to accomplish the Codex’s objectives, “not recommend” an option is not suitable. Propose to delete “is not recommended. It”

Commented [RK27R26]: could be retained, it is a direct quote from ISO2859-10 that discusses the advantages and disadvantages of various options for the design of sampling plans.

Commented [J28]: Comment (19) by Japan (22 May 2023 1:58)

Section number (2.2.1) should be included for easier reference

Commented [RK29R28]: 1.

Commented [J30]: Comment (20) by Japan (22 May 2023 1:59)

“Conformity assessment” is not defined in the definition section. For better understanding by readers, the definition should be included in the definition section, so that users can understand the content better.

Commented [SM31R30]: Agree. Definition for Conformity Assessment to be included.

then it is important to distinguish conformity assessment and acceptance sampling. In this section, conformity assessment will be understood in the narrower sense.

[104]Although acceptance sampling and conformity assessment involve similar procedures, and although consumer and producer risks are defined for both, they are performed in different contexts and follow different objectives.

[105]Conformity assessment

[106]In conformity assessment, conformity is assessed via the application of a decision rule which accounts for measurement uncertainty. Depending on the measurand, the measurement uncertainty may or may not include uncertainty from sampling. Depending on the decision rule, there may be cases where the assessment is inconclusive.

[107]Acceptance sampling

[108]In acceptance sampling, at least one measurement result (typically more than one) is used to decide whether to accept or reject a lot under inspection. The acceptance sampling plan consists in both requirements regarding the sampling procedure (e.g. the number of items to be taken from the lot) and an acceptance criterion. The acceptance sampling plan is determined in such a way as to ensure that producer and/or consumer risks are sufficiently low at a given quality level. The variation of the property of interest in the lot is always taken into consideration in acceptance sampling; however, analytical uncertainty is only taken into consideration if non-negligible. The context for lot inspection is typically a commercial agreement between two trading partners. In acceptance sampling, a lot is always either accepted or rejected; there are no cases of inconclusive lot inspections.

[109]In the case that the quality level is expressed in terms of the percentage of nonconforming items, the distinction between acceptance sampling and conformity assessment is quite clear; the measurand is defined for the individual items, and thus the question of conformity to a specified requirement can only be framed in relation to the individual items. However, lot acceptance or rejection is not decided on the basis of the compliance or non-compliance of an individual item; instead, the acceptance criterion is expressed in terms of the percentage of nonconforming items, i.e., in terms of the distribution of the property of interest among the items in the lot. The differences between acceptance sampling and conformity assessment are summarized in the following table.

[110] Table 1: Differences between acceptance sampling and conformity assessment

[111] [114]Number of [115]measurement results	[112]Conformity assessment [116]Typically: one	[113]Acceptance sampling [117]Typically: several [118](For instance: if the lot consists of discrete items, several items are taken, and there is one measurement result per item)
[119]Is analytical measurement uncertainty taken into account in the decision rule/acceptance criterion?	[120]Always (if possible)	[121]Only if the analytical measurement uncertainty is non-negligible (compared to the lot standard deviation)
[122] Are any components of sampling uncertainty considered?	[123]Depending on the measurand, it may or may not be necessary to include sampling uncertainty	[124] The variation of the characteristic of interest within the lot is considered via the lot standard deviation [125]
[126]Context/background	[127]In many cases: conformity assessment is carried out against a legal limit	[128]The context is often an agreement between trading partners
[129]Inconclusive assessment	[130]Depending on the decision rule, the assessment may be inconclusive	[131]There are no inconclusive inspections: lots are either accepted or rejected.

[132]Further clarifications regarding the term measurand and the distinction between sampling and analytical uncertainty are provided in section 5.2.1.

Commented [B32]: Comment (77) by Brazil (26 May 2023 20:18)

The document should make it clear when uncertainty should apply and whether it will apply in choosing the plan or affect the decision rule.

We also note that the information document mentions sample preparation, sampling and analytical variance, however, variance is not addressed in the guidelines, i.e., how it will be applied to design a sampling plan.

Commented [RK33R32]: 2.Sections 3.2.7 and 5.2 say that allowance might need to be made when the analytical uncertainty e exceeds 10% of the lot standard deviation.

3.The text relates to the design of plans for bulk materials, specifically in this case to the plans in CX5193. The design of these plans is statistically complex and only an overview is presented in section 4.4.

Commented [J34]: Comment (21) by Japan (22 May 2023 1:59)

Propose to add section number (2.2.2)

Commented [RK35R34]: NZ considers that the current structure could be retained, this paragraph is part of the discussion in 2.2.1.

Commented [J36]: Proposed Change (22) by Japan (22 May 2023 2:01)

This text conflicts with the definition of Measurement Uncertainty in CXG-54, in which measurement uncertainty does not include uncertainty from sampling.

The text should read as follows: Measurement uncertainty do not include uncertainty from sampling; however, total MU, including uncertainty from sampling, would be of important.

Commented [RK37R36]: component of MU. Depending on the measurand, measurement uncertainty may or may not include uncertainty from sampling. CXG50 has been updated.

Commented [RK38R36]: If we are considering conformity of the true value of a sample, MU will not include the sampling component whereas if we are looking at conformity of the mean value of a lot for example, the sampling component would be included.

Commented [J39]: Comment (23) by Japan (22 May 2023 2:01)

Section number 2.2.3 should be included.

Commented [RK40R39]: NZ considers that the current structure could be retained, this paragraph is part of the discussion in 2.2.1.

Commented [A41]: Comment (6) by Australia (22 May 2023 1:15)

4. We suggest the table on page 7 should be labelled as 'Table 1: Differences between acceptance sampling and conformity assessment'.

Commented [SM42R41]: Agree

Commented [SM43]: NZ/Germany

[133]Note 1: Figure 1 in CXG 54 illustrates a procedure which can be applied in conformity assessment (this procedure may yield inconclusive results). This procedure should not be applied in acceptance sampling.

[134]Note 2: If the sample taken in lot inspection consists of one single item, then producer/consumer risks may be poorly controlled. Nonetheless, there are special sampling plans for lot inspection based on a single item. These must not be confused with the procedure for conformity assessment illustrated in Figure 1 of CXG 54.

2.3 [135]Acceptance Sampling Plan Performance

[136]Variation is present everywhere; raw materials vary in their composition, manufacturing processes vary and, consequently, the products manufactured by those processes will also vary. Therefore, when we take several samples from a lot, we do not expect those samples to be of the same composition. Furthermore, the presence of measurement uncertainty means that when those samples are tested, we will not get the same result, even if the same sample is retested. Similarly, we would not expect results from different sets of samples taken from the same lot or those taken from different lots (from the same process) to be the same; there will always be some variation-

[137]Due to this variation, the incorrect acceptance or rejection of lots cannot be avoided. However, using a statistical description of the variation within a lot and of the uncertainty of the measurement process allow us to calculate the probability of correctly or incorrectly accepting a lot at any given quality level and for any given sampling plan.

[138]In acceptance sampling, the probability of acceptance depends on:

- [139]the quality level (percent nonconforming) of the lot under inspection
- [140]the acceptance criterion (i.e. for the particular sampling plan)
- [141]the variation of the characteristic within the lot
- [142]the bias and variation inherent in the measurement process (in the case of non-negligible analytical uncertainty).

[143]In practice, the quality level (percent nonconforming) of a lot is not known beforehand; however, for a particular acceptance sampling plan, it is possible to calculate the probability of acceptance at any quality level. The relationship between the probability of acceptance and the quality level for a particular sampling plan is described by the operating characteristic curve.

2.3.1 [144]Operating characteristic curve

[145]The following diagram is an example of an operating characteristic curve (OC curve) that shows the probability of accepting (or rejecting) a lot in terms of its quality level in the lot (expressed as percent nonconforming). This highlights that specification of the quality levels is fundamental to design of a sampling plan.

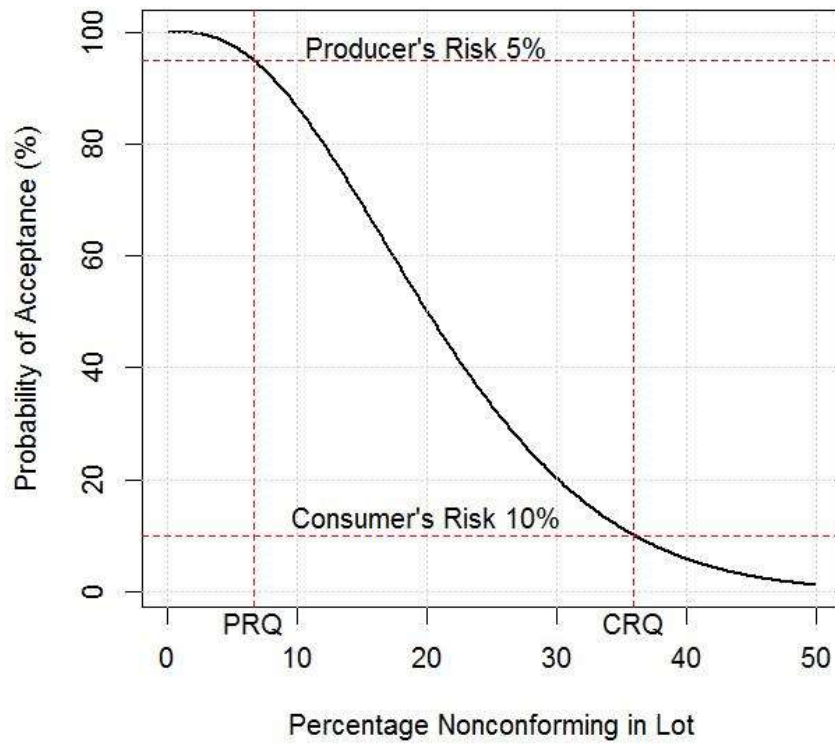
Commented [A44]: Comment (7) by Australia (22 May 2023 1:15)

5. Section 2.3, 'Acceptance Sampling Plan Performance' end of first paragraph – remove strikethrough above the full stop.

Commented [SM45R44]: Agree

[146]

Operating Characteristic Curve



[147]Note: The OC curve does not say anything about the quality of a given lot; it serves only to show the probability of accepting a lot with a particular quality level.

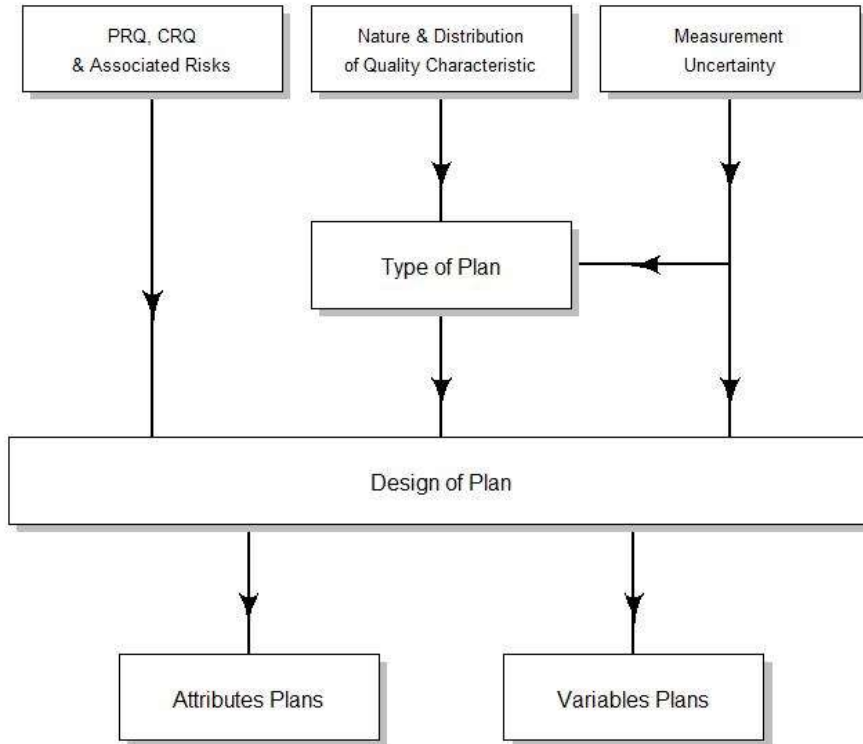
[148]

3 [149]Design of Sampling Plans

3.1 [150]Sampling Plan Design Process

[151]
[152]

Sampling Plan Design Process



3.2 [153]Inputs to Sampling Plans

3.2.1 [154]Stringency

[155]As explained, the application of acceptance sampling plans does not eliminate the risk that a lot of poor quality will be incorrectly accepted nor that a lot of good quality will be incorrectly rejected.

[156]However, designing such plans using statistical principles allows these risks to be controlled. This is achieved by specifying a particular producer's risk quality level, the PRQ, and a particular consumer's risk quality level, the CRQ, along with a corresponding producer's risk (PR) and a consumer's risk (CR) respectively. Once these four parameters, the PRQ, CRQ, PR and CR, are specified the probability of acceptance and therefore the producer's and consumer's risks at any quality level are uniquely determined.

[157]The term stringency is used in these Guidelines to refer to the ability of a sampling plan to control consumer's and producer's risks, of incorrectly accepting or incorrectly rejecting a lot, at any specified quality level.

[158] Often, the producer's risk is specified as 5%, meaning that the probability of rejecting a lot with PRQ is at most 5%. Similarly, the consumer's risk is typically chosen as 10%, meaning that the probability of accepting a lot with CRQ is at most 10%. If any one of the four parameters is altered, the control of the producer's and consumer's risks will change.

[159] In certain situations, such as characteristics relating to food safety where control of the consumer's risk is paramount, it might not be appropriate to take account of the producer's risk in the design of sampling plans. This leads to two different options for the specification of risks.

[160] Option 1: Plans that explicitly control both the consumer's risk and the producer's risk:

- [161] both the PRQ and CRQ, along with the respective allowable probabilities of incorrect rejection (PR) and incorrect acceptance (CR) are specified.

[162] Option 2: Plans that explicitly control only the consumer's risk:

- [163] plans for assessments of lots consisting of discrete items.

3.2.2 [164] Fitness for purpose

[165] Codex methods of sampling should be *'designed to ensure that fair and valid sampling procedures are used when food is being tested for compliance with a particular Codex commodity standard'*³. When commodity committees have included sampling plans in a Codex commodity standard, these should be referred to CCMAS for endorsement along with relevant information relating to the sampling plan.

[167] Sampling plans from other sources are still acceptable subject to their endorsement by CCMAS.

[168] The Principles for the Use of Sampling and Testing in International Food Trade (CXG 83-2013) states:

[169] *'Sampling and testing procedures are fit for purpose in a given product assessment, if, when used in conjunction with appropriate acceptance criteria, they have acceptable probabilities of wrongly accepting or wrongly rejecting a lot or consignment'*.

[170] Fairness

[171] With regard to fairness, consideration of both the consumer's risk and the producer's risk is necessary to avoid situations such as the following:

- [172] sampling plans having inappropriate stringency, e.g. plans for the assessment of composition that are more stringent than for food safety
- [173] high producer or consumer risks that may arise due to the use of sampling plans not based on appropriate specifications of allowable risks
- [174] sampling plans not based on statistically valid principles, e.g. *ad hoc* plans or plans that do not (properly) allow for measurement uncertainty.

[175] In addition, in the interests of fairness, designers of plans should also take account of the measures that the producer may have to take to ensure compliance, given that it is usually not suitable for the producer to use the same sampling plan as that used by the consumer.

[176] In selecting a sampling plan, it should be ensured that producers are not exposed to unreasonable costs in terms of sampling and testing, loss of yields, or excessive rejection of their products to achieve compliance.

[177] Practicality

[178] It is important to ensure that any sampling plan chosen will be practical to apply in terms of cost of sampling and testing and ease of use.

[179] Other strategies could be used to develop sampling plans that are more economical in terms of sampling and testing, such as:

Commented [J46]: Proposed Change (24) by Japan (22 May 2023 2:05)

In Codex guidelines, "must" is not used and should is used instead. Japan proposes to change the beginning of the text as follows: With regard to fairness, consideration of both ...

Commented [SM47R46]: Agree

Commented [J48]: Proposed Change (25) by Japan (22 May 2023 2:06)

If both parties agree to use a sampling plans not based on statistically valid principles (e.g. empirical sampling plan), there are no issues on fairness. Deletion proposed.

Commented [RK49R48]: NZ considers that this text could be retained; it is quite possible that plans agreed in this way might not control the risks as intended and might possibly be unfair – CXG 50 will allow the evaluation of any proposed plans to help avoid these situations.

Refer comment para 98.

[166]³ –Section II: Elaboration of Codex Texts: Principles for the Establishment or Selection of Codex Sampling Procedures: Purpose of Codex Methods of Sampling (Codex Procedural Manual, latest edition)

- [180]managing average non-compliance rates over the medium to long term, rather than possibly paying a high premium in terms of testing costs for high levels of assurance on a lot-by-lot basis
- [181]the use of 'indifference' plans that are designed around the 'Indifference Quality Level' (IQL), the level of defects at which there is 50% acceptance, rather than based on PRQ, CRQ. This leads to plans having more manageable sample sizes
- [182]offsets, sometimes called guard-bands or buffers, between the limits used in the acceptance criteria and the actual specification limits for a provision can be used to reduce consumer's risk and to mitigate possibly unreasonably high sample numbers. However, offsets should be used with caution in the interest of fairness to producers.

3.2.3 [184]Specification limits

[185]For a given characteristic, a specification limit may be expressed as a minimum or a maximum limit (or both) applied either to each individual item in a lot, or to the average level.

[186]Specification limits should apply to the 'true' values of the characteristics rather than to the measurements themselves. It follows that the assessments of lot compliance should also be in terms of the 'true' values of the characteristic within the lot (refer section 5.2.1).

[187]Offsets

[188]It is important to consider whether a given specification limit has an in-built offset (guard-band), and whether the offset reflects the measurement uncertainty associated with a particular sampling plan, that might include both analytical and sampling uncertainties.

[189]Many provisions for chemical and microbiological contaminants have in-built offsets between the specification limits and the levels of contamination at which foods might become unsafe to consume. In such cases one may not need to design plans to provide high levels of protection against exceeding the limits as the consumer's risk is already well controlled by these offsets.

[190]The use of offsets enables a reduction in sample size; for example, while large sample sizes are needed to show that a lot contains no more than say 1% nonconforming product, much smaller sample sizes are required to show that no more than 10% of the product in a lot exceeds a tightened limit.

3.2.4 [191]Lot homogeneity

[192]Acceptance sampling plans are usually based on the assumption that lots are homogeneous; indeed, the international definition of a lot is 'a quantity of product produced under conditions presumed uniform'.

[193] In CXG 50, the term 'homogeneous' does not mean that the characteristic of interest does not vary within the lot. Rather, the term 'homogenous' means that it is possible to characterize the variation of the characteristic of interest within the lot by means of a single standard deviation. Homogeneity applies only to variables plans.

[194]

[195]In considering homogeneity, one needs to draw a distinction between:

- [196]the type (shape) of the distribution, (e.g., normal distribution)
- [197]the spatial distribution of the characteristic within the lot.

[198]If the lot consists of discrete items and if random sampling is used (as recommended for all plans in these Guidelines) then the spatial distribution does not matter and the lot cannot always be considered homogenous.

[200]For this reason, if no prior information regarding the spatial distribution is available, then random sampling should be performed.

[201]On the other hand, if prior knowledge indicates that the spatial distribution of the characteristic within the lot is random, then random sampling is not required. This case corresponds perhaps to the intuitive understanding of what homogeneity means in the context of acceptance sampling.

Commented [J50]: Proposed Change (49) by Japan (24 May 2023 8:26)

It may be applicable to process management or continuous lot, but not applicable to testing of isolated lot at export. Propose to add "if suitable"

Commented [RK51R50]: Agree, the text has been amended.

Adding "if suitable" doesn't seem necessary, this point is included as one of the possible options that might be used to avoid high levels of testing.

Commented [J52]: Comment (29) by Japan (22 May 2023 2:07)

'Indifference' plans and IQL are not defined in this document. For understanding of readers who are not familiar with these terms, they should be clearly defined in definition section.

Commented [SM53R52]: Agree. Definitions to be added

Commented [SM54]: NZ/Germany: delete the last paragraph with the question of "homogeneity across lots". Perhaps this point can be addressed in the information document.

Commented [A55]: Comment (8) by Australia (22 May 2023 1:16)

6. Section 3.2.3 'Specification limits', second paragraph, second sentence. The '(refer section 5.2.1).' may need amendments as this section '5.2.1 Measurement uncertainty' doesn't mention 'true' values.

Commented [RK56R55]: While the true values do not need to be considered when estimating measurement uncertainty, this section refers to the true values as they relate to the specification limits.

Commented [J57]: Comment (31) by Japan (22 May 2023 2:08)

The definition of "lot" in this text is not in line with that in section 1.3. Consistency needed.

Commented [RK58R57]: The definition of lot has been updated.

Commented [SM59]: NZ/Germany

Commented [SM60]: NZ/Germany

Commented [SM61]: NZ/Germany

[202]If random sampling cannot be performed, then the lot can only be considered homogenous to the extent that the spatial distribution is random. In this sense, if random sampling cannot be performed, the homogeneity of the lot depends on the spatial distribution.

For some lots consisting of bulk material, inhomogeneity means that several segments must be sampled from.

[203]Sections 4.4 and 6.3 provide further guidance regarding the inspection of inhomogeneous lots consisting of bulk materials or discrete items, respectively.

3.2.5 [204]Distribution of the characteristic

[205]The options for sampling plans depend on whether the test results are measurements (variables data) or have nominal outcomes (attributes data). In some cases, variables data can be classified as binary outcomes, but this should only be done after careful consideration of the sampling options available as the sample size for attributes inspection can be much larger than for variables data.

[206]In the case of variables data, the assumed statistical distribution of the measurements in the lot should also be specified, i.e. whether the characteristic is normally distributed, a compositional proportion, or follows some other distribution. If it is not possible to make an assumption regarding the distribution of the data, results can be classified as attributes (as long as measurement uncertainty is negligible (refer section 3.2.8), or plans based on the Fractional Nonconformance (FNC) method can be used (as long as measurement uncertainty is non-negligible (refer section 5.2.6)).

[207]However, the characteristic does not have to follow the assumed distribution exactly (and, in any case, it is difficult to verify conformance to a distribution based on a small sample size). In practice, it is sufficient that the assumed distribution provides a satisfactory model for the behaviour of the characteristic in the lot. However, if the actual distribution in the lot differs markedly from the assumed distribution, then the producer's and consumer's risks may exceed the allowed levels specified in the design of the plan.

[208]A typical ('default') assumption in variables plans is that the characteristic follows a normal assumption.

[209]It is important to note that in the case of attributes plans, the binomial distribution is always available as 'default' assumption, and that departures from this assumption regarding the type (shape) of the distribution will have very little impact on the producer's and consumer's risks.

[210]Sections 4.4 and 6.3 provide further guidance regarding the inspection of inhomogeneous lots consisting of bulk materials or discrete items, respectively.

[211]Prior knowledge of the distribution of a characteristic

[212]In acceptance sampling, acceptance/rejection of a lot is decided on the basis of a sample (the set of individual items or increments taken from the lot). The relationship between the probability of acceptance (upon application of a given sampling plan) and the quality level of the lot is determined on the basis of prior knowledge regarding the distribution of the characteristic within the lot.

[213]This means that prior knowledge is required *even in connection with the inspection of isolated lots*. In other words, the inspection of isolated lots does not mean that no prior information is available. On the contrary, prior information is always required. Sometimes the prior information takes the form of (tacit) assumptions based on experience and expert judgment. For example, a typical ('default') assumption in variables plans is that a characteristic follows a normal assumption.

[214]If the actual distribution in the lot differs markedly from the assumed distribution, then the producer's and consumer's risks may exceed the allowed levels specified in the design of the plan. There are two ways in which the actual distribution can differ from the distribution which was assumed on the basis of prior knowledge:

- [215]the type (shape) of the distribution. For example, the assumption is that the distribution is normal whereas, in fact, the distribution is lognormal
- [216]the parameters of the distribution. For example, it is assumed that the lot standard deviation is the same as the (underlying) process standard deviation, whereas in fact it is twice as large.

Commented [J62]: Proposed Change (32) by Japan (22 May 2023 2:10)

Use should instead must for guidelines.

Commented [SM63R62]: Agree

[217] It is important to note that in the case of attributes plans, the binomial distribution is always available as 'default' assumption, and that departures from this assumption regarding the type (shape) of the distribution will have very little impact on the producer's and consumer's risks.

3.2.6 [218] Lot standard deviation

[219] In the context of these Guidelines, the population under consideration is the lot itself rather than the underlying process. For this reason, the role which the *process* standard deviation σ plays in the ISO 3951 standards is now played by the lot standard deviation. The lot standard deviation can be represented by either its true value σ (sigma) or by an estimate (often denoted s) of σ .

[220] The lot standard deviation is relevant only for variables plans, particularly for characteristics that are normally distributed or follow distributions, such as the lognormal distribution⁴, that are related to the normal distribution.

[222] For a given characteristic, the lot standard deviation is a measure of the random variation of the characteristic within the lot under inspection. *Its estimate, however, may be affected by components of analytical or sampling uncertainty.*

[223] It is expected that for isolated lots the lot standard deviation will usually be calculated from the test results obtained during the inspection. Notwithstanding, there are cases where the lot standard deviation may be known, especially when the lot has been produced by a process with a known process standard deviation. This can be adopted as lot standard deviation. In such cases, the sample size of the sampling plan can be considerably reduced.

[224] If the process standard deviation is known, it is important to consider whether it was obtained on the basis of a sufficiently large number of data to ensure it provides a reliable characterization of the variation within the process.

[225] *Note: In acceptance sampling, the lot standard deviation is always based on a simple random sample. However, in principle, other sampling procedures may be applicable, such as those described in Annex C.2 of EURACHEM⁵ / CITAC guide Measurement uncertainty arising from sampling. This guide describes several procedures for the calculation of sampling uncertainty. It does not describe procedures for acceptance sampling.*

3.2.7 [227] Measurement uncertainty

[228] In connection with lot inspection, it is important to determine whether the analytical components of measurement uncertainty – including the uncertainty which arises from subsampling from the laboratory sample (refer section 5.2.6) – can be considered negligible. This is typically done by considering the ratio of the analytical uncertainty and the lot standard deviation. If the analytical component of measurement uncertainty cannot be considered negligible, it should be taken into consideration in the acceptance criterion.

[229] Adjustment for the analytical component of measurement uncertainty in acceptance sampling is discussed in more detail in section 5.

[230] The lot standard deviation already represents the variation of the characteristic of interest within the lot and any further uncertainty arising from the sampling procedure. For this reason, in determining whether an adjustment is necessary, only the analytical component of measurement uncertainty needs to be considered.

[231] The term *measurement error* should not be used, as the term has been superseded by the focus on uncertainty across JCGM⁶, ISO and EURACHEM standards and guides, as reflected in the Guidelines on Measurement Uncertainty (CXG 54-2004) and as adopted in the present guideline.

3.2.8 [233] Lot size

[234] Lot size is not normally an input required for the design of sampling plans intended to control both the consumer's and producer's risks in acceptance sampling. However, specification of the lot size is required for attributes plans applied to small lots and it is an input in the sampling plans described in the ISO 2859 and ISO 3951 standards (refer sections 4.2.3, 4.3.4 and Appendix II).

[221]⁴ For lognormally distributed characteristics, the logarithms of the 'measurements' are normally distributed

[226]⁵ A network of organisations in Europe having the objective of establishing a system for the international traceability of chemical measurements and the promotion of good quality practices

[232]⁶ The Joint Committee for Guides in Metrology (JCGM)

4 [235]Sampling Plans

4.1 [236]Selection of Sampling Plans

[237]The following table provides direction to the relevant sections within these Guidelines:

[238]Table 2: Direction to the relevant part for the selection of sampling plans

[239]Homogeneous lots				
[240]Data Type	[241]Nature of Provision	[242]Distribution	[243]Negligible measurement uncertainty	[244]Non-negligible [245]measurement uncertainty
[246]Attributes	[247]Minimum or maximum	[248]Not applicable	[249]Inspection by Attributes Plans [250](section 4.2) [251]Appendix II [252]Table 8.4.1	[253]Known inspection errors [254](section 5.1.1)
[255]Variables	[256]Minimum or maximum	[257]Normal	[258]Inspection by Variables Plans [259](section 4.3) [260]Appendix II [261]Table 8.4.2	[262]Repeatability error (no laboratory bias) [263](section 5.2.6)
[264]	[265]	[266]	[267]	[268]General measurement uncertainty (sections 5.2.5, 5.2.7, 5.2.8)
[269]	[270]	[271]	[272]	[273]Fractional nonconformance Plans [274](section 5.2.8)
[275]	[276]Minimum or maximum	[277]Non-normal	[278]Classification to attributes [279](Section 4.3.3)	[280]Fractional nonconformance Plans [281](section 5.2.8)
[282]Variables	[283]Minimum or maximum	[284]Compositional Proportions	[285]Plans for compositional proportions [286](section 4.4.10)	[287]Not included
[288]	[289]Average level	[290]Not applicable	[291]Plans for average level [292](section 4.3.5)	[293]Not included
[294]Inhomogeneous Lots (Bulk Materials)				
[295]Attributes	[296]Minimum or maximum	[297](blank)	[298]Attributes plans [299](section 4.4.6) [300]	
[301]Variables	[302]Minimum or maximum	[303](blank)	[304]Variables plans [305](section 4.4.9) [306]	
[307] [311]	[308]Average level [312]	[309]Not applicable [313]	[310]Plans for average level [314](section 4.4.8)	

4.2 [315]Inspection by Attributes Plans

4.2.1 [316]Introduction

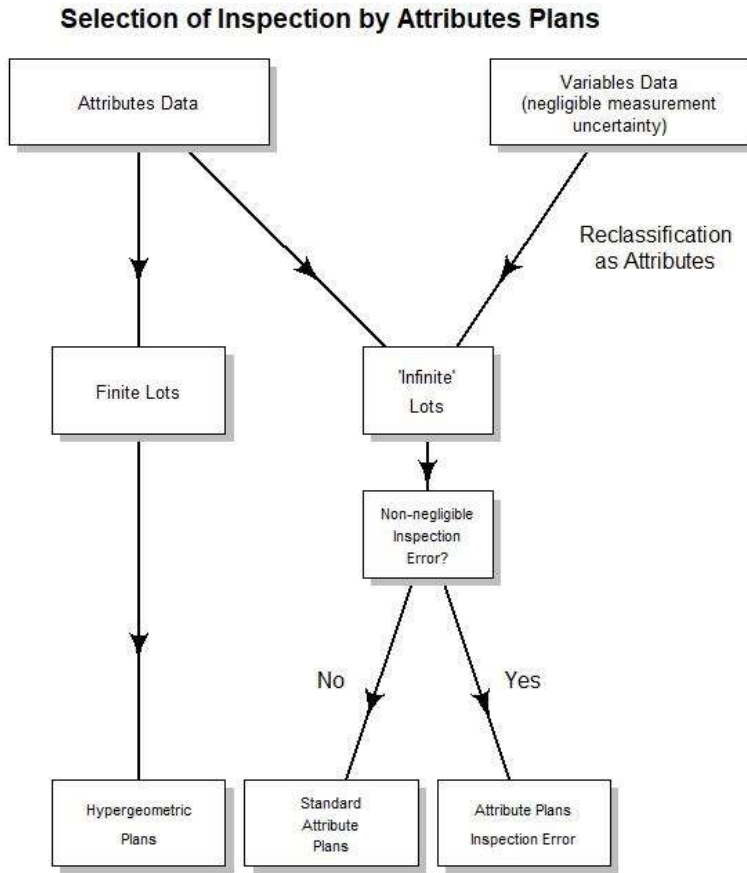
[317]These plans are usually referred to as attributes sampling plans. They are the simplest type of single sampling plan because the inspection results are classified into two possible outcomes - conforming or nonconforming. Because they are applicable to all sampling situations, they have become the benchmark that all other sampling plans can be compared against.

[318]The following diagram shows the process for the selection of attributes sampling plans as it depends on the type of data and nature of the lot.

Commented [P64]: Comment (80) by Philippines (30 May 2023 3:44)
 The diagram under the introduction is suggested to be transferred to Appendix I
 Rationale:
 Appendix I demonstrate on how to select a sampling plan which can be better demonstrated through a diagram

Commented [RK65R64]: For consideration at the in-session WG.

[320]



4.2.2 [321]Two-class attributes plans

[322]Two-class attributes plans are defined by two numbers: the sample size n , the number of items to be taken from the lot under inspection and the acceptance number c , the maximum number of nonconforming items allowed in the sample for acceptance of the lot. If the number of nonconforming items in the sample is less than or equal to c then the lot can be accepted. If the number of nonconforming items found is greater than c then the lot is rejected. In their most general form, the number of samples n and the acceptance number c for these plans are determined from specifications of the allowable consumer's and producer's risks. It should be noted that c need not be zero (refer section 4.2.5).

[323]These plans can be used for either isolated lots or a continuing series of lots that consist of either discrete items or are bulk materials.

4.2.3 [324]ISO Standards - attributes plans

[325]The ISO 2859 series of standards provides sampling plans that are indexed by either CRQ or PRQ. The lot size is an input to the sampling plans in these standards as the sample size depends on the lot size.

Commented [B66]: Comment (76) by Brazil (26 May 2023 20:01)
Brazil suggests checking if the information given in the last sentence of this paragraph is consistent: "It should be noted that c need not be zero (refer section 4.2.5)".

Commented [RK67R66]: This is correct – the acceptance number does not need to be zero - compliance of results does not mean compliance of the product (and vice versa), this is mentioned again in 4.2.5

[326]The ISO 2859-2 plans are indexed by CRQ and are intended for the inspection of isolated lots consisting of discrete items. These plans are suitable for application in the field of food safety when it is not appropriate to explicitly control producer risks in the design of the plans.

[327]Appendix II contains tables for Inspection by Attributes Plans from ISO 2859-1.

[328]These plans are indexed by the PRQ.

4.2.4 [329]Plans for small lots (based on the hypergeometric distribution)

[330]If the sample size is large in relation to the lot size, some economy in the number of samples may be possible. As a rule, such economies are possible if the number of items, calculated assuming an infinite lot size, exceeds 10% of the lot size. For conceptually infinite lots, sampling plans based on the hypergeometric distribution are the same as the general two-class plans based on the binomial distribution.

4.2.5 [331]Zero-acceptance number plans

[332]Zero-acceptance number (ZAN) plans are a special case of two-class plans in which the acceptance numbers are set to $c = 0$. They are used in more critical situations such as for pathogens or foreign matter where only consumer's risk is considered directly and acceptance of lots demands that nonconforming items are not found in the inspection.

[333]However, just because nonconforming items have not been found does not mean that they are not present in lots that have passed inspection. One disadvantage of ZAN plans is that they have poor discrimination between lots of good and poor quality, so they may not be generally applicable. The low sample numbers generally employed for microbiological applications enable high levels of consumer protection to be provided because of the offsets between the limits used in those plans and levels of contamination at which food might become unsafe (refer section 3.2.4).

[334]ZAN plans for finite lots can also be designed based on the hypergeometric distribution.

4.2.6 [335]Three-class attribute plans

[336]In these plans inspection results are classified into three classes, usually referred to as 'good', 'marginal' and 'poor' or 'unacceptable'. This type of plan is frequently used in microbiological assessments. They have an advantage, relative to two-class plans, of providing better discrimination between good and poor quality i.e., they have 'steeper' OC curves than two-class plans for the same number of samples.

[337]Three-class plans are defined by four numbers (n, c, m, M) where:

- [338] n is the number of samples to be taken
- [339] c is the maximum number of 'marginal' samples allowed for acceptance of the lot
- [340] m is the limit separating good quality from marginal quality samples
- [341] M is the limit above which samples are classified as 'poor'
- [342]Samples with results lying between the numbers m and M are classified as marginal.

[343]Lots are accepted provided:

- [344]None of the n samples is poor, having levels exceeding M
- [345]At most c of the samples are marginal, with levels between m and M .

[346]If $m = M$ a three-class plan becomes a two-class plan.

[347]Evaluation of these plans generally requires an assumption about the underlying distribution of the identified characteristic, such as the lognormal distribution for microbiological parameters. This might also apply to two-class plans, especially for microbiological plans.

[348]Three class plans for finite lots can be designed based on the hypergeometric distribution.

4.2.7 [349]Plans for variables data where an appropriate distribution is unknown

[350]If the underlying distribution of a measured characteristic within a lot is not known and we are not prepared to assume that the characteristic can be adequately described by the normal or some other distribution, then the only recourse available is to classify the results as conforming or nonconforming

with respect to the specification limit and to use attributes plans. Note that this approach should be used only when measurement uncertainty is negligible.

4.2.8 [351]Attribute plans for multiple characteristics

[352]Attributes plans can be easily applied to multiple characteristics by classifying inspected items as nonconforming if any of the individual characteristics are nonconforming.

[353]Obviously, it makes sense to apply a plan to multiple characteristics only if the individual characteristics are of similar 'stringency', i.e., if the same or similar plans would be used if the characteristics were inspected individually. These plans have the advantage, compared to the use of individual plans, of allowing better control of producer's risk, of incorrectly rejecting lots of good quality.

4.3 [354]Inspection by Variables Plans

4.3.1 [355]Introduction

[356]If the underlying distribution of a measured characteristic is known, acceptance sampling can be performed directly on the measurements themselves. This often allows a considerable reduction in sample size.

[357]For variables plans it is necessary to make an assumption regarding the distribution of the characteristic within the lot. While the normal (Gaussian) distribution is commonly adopted, for compositional proportions in bulk materials the beta distribution is more appropriate (though the normal distribution can serve as an approximation).

[358]The following diagram shows the process for the selection of variables sampling plans:

Commented [P68]: Comment (81) by Philippines (30 May 2023 3:44)

The diagram under the introduction is suggested to be transferred to Appendix I.

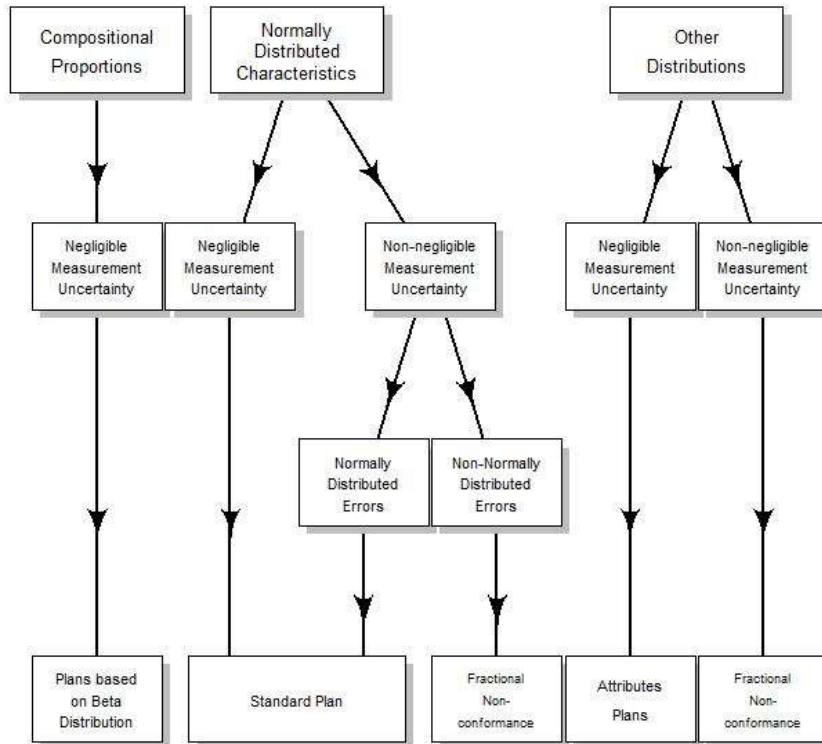
Rationale:

Appendix I demonstrate on how to select a sampling plan which can be better demonstrated through a diagram

Commented [RK69R68]: For consideration at the in-session WG

[360]

Selection of Inspection by Variables Plans - Homogeneous Characteristics



4.3.2 [361] Advantages and disadvantages of variables plans

[362] The advantages of variables sampling plans are:

- [363] they offer the same protection with a smaller sample size than that required for attributes plans
- [364] there is feedback of data on the process which produced the units
- [365] there is more information available in waiver situations
- [366] the extent of conformity of each unit is taken into account in the application of the plan.

[367] The disadvantages are:

- [368] the outcome is dependent on the appropriateness of the underlying distribution, that the assumed statistical distribution provides a satisfactory description for the behaviour of the characteristic within the lot
- [369] they are only applicable to one characteristic at a time
- [370] there may be a higher inspection cost per unit

- [371] a lot with no nonconforming units may be rejected by a variables plan, that occur when the average level lies too close to the specification limit, as measured in terms of the variation in the lot (lot standard deviation)
- [372] there is a possibility that no nonconforming units are found to show to the producer after rejection.

4.3.3 [373] Variables plans

[374] Variables sampling plans are defined by two numbers: the sample size n , i.e., the number of items to be taken from the lot under inspection, and the acceptability constant k , i.e., the multiplier of the lot standard deviation S in the acceptance criterion.

[375] A lot is accepted if $\bar{X} + kS \leq U$ for an upper specification limit U or if $\bar{X} - kS \geq L$ for a lower limit L .

4.3.4 [376] ISO Standards - variables plans

[377] The ISO 3951 standards provide sampling plans that are indexed by either CRQ or PRQ. The lot size is an input to the sampling plans in these standards as the sample size depends on the lot size.

[378] The ISO plans indexed by CRQ are intended for the inspection of homogeneous isolated lots consisting of discrete items. These plans are more suited for provisions relating to food safety when it is not appropriate to explicitly control producer risks in the design of the plans.

[379] Appendix II contains tables for Inspection by Variables Plans from ISO 3951-1. These plans are indexed by the PRQ.

[380] The ISO 3951-6 standard also contains procedures that deal with non-negligible measurement uncertainty. This is discussed in more detail in section 5.

4.3.5 [381] Plans for the average level in the lot

[382] In some cases, such as the net weight of packages, a limit applies to the average level, with the intention that the average level in the lot should not be less than the limit. In Codex, although an example of sampling plans for bulk materials, the plans for aflatoxins are also based on compliance of the average level. This is an example of the use of offsets (refer section 3.2.3).

[383] It is usually assumed that the quality characteristic is normally distributed; the appropriateness of the distribution is less critical when compliance of the average level is being assessed. It is also usually assumed that there is a single specification limit, either a lower specification limit, L or an upper specification limit, U .

[384] When the lot standard deviation σ is known based on historical process data, the inspection plan for compliance of the average level to a minimum limit L is operated as follows:

1. [385] Take a random sample of size n and obtain the sample mean
2. [386] Calculate $A = L + k \times \sigma$
3. [387] If the sample mean $\bar{x} > A$ accept the lot; otherwise reject the lot.

[388] The parameters of the plan are n and k . Note that k does not denote the same quantity as in the usual variables plans. When the lot standard deviation σ is unknown, it is replaced with the sample standard deviation s . The OC curve for this plan is less discriminatory than the plan when the standard deviation σ is known, and a greater sample size will be required to provide equivalent discrimination to that provided when the standard deviation is known.

4.4 [389] Sampling of Bulk Materials

4.4.1 [390] Introduction

[391] Bulk materials are continuous, consisting for example of particles of different densities and sizes. It is impossible to consider a lot of a bulk material as a set of discrete items because there is no way of selecting the items in a way that is not biased when using simple random sampling.

[392] Some general objectives of bulk sampling are:

- [393] acceptance on a lot-to-lot basis

Commented [A70]: Comment (9) by Australia (22 May 2023 1:16)

7. Section 4.4.1 'Introduction', second dot point. We suggest the footer reference '12', should have the strikethrough removed

Commented [SM71R70]: Agree. Please note the footer number has changed.

- [394]characterizing the material as to grade⁷, any need for further processing, and its destination
- [397]determination of weight or content for purposes of payment
- [398]determination of properties that must be known so that the end use will be appropriate
- [399]experimentation and analysis to determine further sampling procedures and uses of the material.

[400]Sampling units are created at the time of sampling by means of some kind of sampling device. The sampling units change depending on different factors such as how the device is employed, and the conditions that the device is used under.

[401]In bulk sampling, a lot is seen as being composed of mutually exclusive segments.

[402]Sometimes the segments are obvious, such as when the material comes in boxes or bags.

[403]Other times the segments are not obvious, and so they have to be artificially created. One way of doing this is by superimposing imaginary grids over the material.

4.4.2 [404]Theory of sampling

[405]The theory of sampling provides a comprehensive approach to the design of representative sampling, the aim of which is to obtain a sample for laboratory analysis whose composition is an unbiased estimate of the average level of a lot. However, this sample would not, by itself, be useful for assessing conformance of a lot to minimum or maximum specification limits as an additional allowance is required to compensate for variation in the lot to enable such assessments to be made.

4.4.3 [406]Terminology

[407]The special nature of sampling for bulk materials has led to the use of specific terminology, although this terminology varies between different fields, and between authors. Some of the commonly used terms are set out in the following table:

[408]Table 3: Bulk material terminology for sampling plans

[409]Term	[410]Meaning
[411]Lot	[412]An identifiable quantity of a food commodity delivered at one time and determined to have common characteristics, such as origin, variety, type of packing, packer, consignor, or markings.
[413]Segment	[414]A portion of the lot to which inference will be made.
[415]Increments	[416]Randomly selected samples that represent the segment and may be used to form a composite sample.
[417]Blending	[418]The mixing or agglomerating of increments to form the composite sample.
[419]Composite sample	[420]A sample formed by blending a certain number of increments from specified segments of the lot.
[421]Sub-sample	[422]A portion of the composite sample that is sent to the laboratory. [423]Note: In CXG 54 and in the diagram that follows, this is called 'laboratory sample'.
[424]Laboratory sample	[425]A portion of the sub-sample that is measured. [426]Note: In CXG 54 and in the diagram that follows, this is called 'test portion'.

[395]⁷ Foods and other materials are often ranked according to their quality, with the different quality levels are sometimes known as grades.

Commented [J72]: Comment (50) by Japan (24 May 2023 8:35)

It is not clear what kind of situation is expected. We propose to delete this part unless further explanation is available.

Commented [RK73R72]: NZ considers that this section could be retained.

It gives some high-level insight into the issues involved with the design of sampling plans for bulk materials, that is far from straight-forward (which is why no detail is presented). Part of the design procedure involves experimentation, possibly by computer, to assess the robustness of any proposed plan.

Commented [J74]: Comment (35) by Japan (22 May 2023 2:14)

"Sampling device" is an important part when considering sampling. If the guideline refers to sampling device, further explanation is needed. Otherwise, deletion of reference to sampling device is acceptable.

Commented [RK75R74]: NZ considers that this text could be retained.

Section 6.1 (Physical sampling) mentions sampling devices by referring to ISO and other standards; there are too many different situations to be able to provide details in CXG 50. Search for 'sampling' and other key words under Standards in: <https://www.iso.org/obp/ui#search>

Commented [A76]: Comment (10) by Australia (22 May 2023 1:17)

8. Section 4.4.2 'Theory of Sampling', first paragraph, first sentence. Has 'The Theory of Sampling provides...', we suggest this was capitalised for a citation footnote, "Esbensen, Kim & Wagner, Cooper. (2015). Theory of sampling (TOS) - Fundamental definitions and concepts. 27. 22-25". Suggest either removal of capitalisation, or re-insert citation footnote.

Commented [SM77R76]: Agree

We cannot include references in CXG 50. We have removed capitalisation

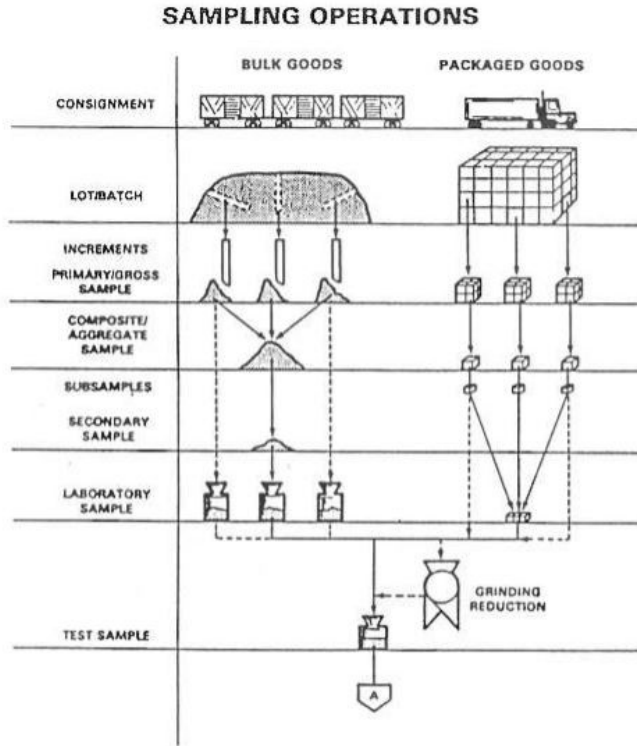
Commented [J78]: Comment (36) by Japan (22 May 2023 2:15)

This text has Section 1.3 definitions. The definitions in this section should be included in Section 1.3 so that users can easily find definitions of terms.

Commented [RK79R78]: The definitions for bulk sampling are not "mainstream" and do not have relevance to the remainder of the document. We suggest that they remain in this section.

4.4.4 [427] Illustration of terms

[428]The following diagram shows how these definitions relate to the different aspects of the overall sampling process, from the sampling of the bulk material to obtaining laboratory samples for testing:
[429]



Commented [J80]: Comment (38) by Japan (22 May 2023 2:17)

Terms in the picture, such as primary sample, composite sample, laboratory sample and test sample, should be defined in definition section.

In addition, this figure seems to be copied from somewhere. Japan is wondering if the rights of its intellectual properties are solved.

Commented [RK81R80]: NZ considers the diagram is helpful to understand why sampling for bulk materials is different.

The in-session WG will consider whether the diagram is retained and if so, whether any commentary is needed.

Please see our comment for [406]

NZ will discuss copyright issues with NMKL.

4.4.5 [430] Design of general sampling plans for bulk materials

[431]In the simplest case, such as the inspection of bulk materials of manufactured products, lots can often be considered homogeneous, allowing the standard attributes or variables plans to be used, with adjustment for analytical measurement uncertainty where appropriate.

[432]On the other hand, some bulk materials, such as shipments of grains or other raw materials, cannot be considered homogeneous (refer section 3.2.7). Special techniques are required for this situation, but the statistical methods are complex and only an overview is provided in these Guidelines.

[433]Lot homogeneity is difficult to verify for bulk materials and generally requires large numbers of samples. Moreover, it is often difficult to perform random sampling from an entire lot of a bulk material. As a precaution, in cases where lot homogeneity can be neither assumed nor verified, lots should be treated as inhomogeneous.

[434]The general approach to sampling inhomogeneous lots of bulk materials is that a lot is considered as a set of smaller segments (strata) each of which is more homogeneous than the entire lot. This allows the usual sampling procedures based on random sampling to be applied within each segment as inhomogeneity within each segment will have less effect.

[435]The basic sampling and inspection procedure can be described as follows:

- [436]segments, from which increments are to be taken are chosen at random
- [437]several increments are chosen at random from each of the chosen segments

Commented [A82]: Comment (11) by Australia (22 May 2023 1:17)

9. Section 4.4.5 'Design of general sampling plans for bulk materials', second paragraph. Suggest amendment '.....homogeneous (refer section 3.2.74). Special techniques are required...'

Commented [SM83R82]: Agree. Amended

- [438]the increments from each segment can sometime be combined to form a composite sample, which is thoroughly mixed
- [439]one or more sub-samples are taken from each composite sample
- [440]these sub-samples are tested
- [441]acceptability of the lot is decided based on an acceptance criterion.

4.4.6 [442]Attributes plans for bulk materials

[443]The following points need to be considered in the design of attributes plans for bulk materials:

- [444]inhomogeneity will be present and hence the standard attribute sampling plans for homogeneous lots will not be suitable as they do not provide adequate protection for consumers
- [445]inhomogeneity can be overcome either by allowing for the correlation within the batch in the design of the sampling plan or, alternatively, by splitting the lot into more homogeneous segments, and using stratified sampling techniques. Either way, a preliminary study is needed to estimate the correlation and the variation between segments
- [446]the proposed plans should be validated using different statistical models for the behaviour of the level nonconforming within the lot, to ensure robustness against different levels of correlation.

4.4.7 [447]Variables plans for bulk materials

[448]Typically, the total observed variation within a lot of bulk materials consists of several components due, for example, to variation between and within segments, due to sample preparation (e.g., including sub-sampling), testing and other causes.

[449]Sampling plans for bulk materials, especially cost-optimal sampling plans, can be designed most effectively with prior knowledge of the different components of variation that exist within lots; it is desirable that a preliminary investigation of the variation is carried out prior to the development of any plans.

[450]A minimum of 10 samples per segment is recommended to estimate the within lot variability, if the acceptance criterion involves averaging of multiple test results, laboratory samples should be tested at least in duplicate to allow estimation of the repeatability component of measurement uncertainty, unless an estimate is available from other sources such as a method validation study.

Commented [A84]: Comment (12) by Australia (22 May 2023 1:17)
10. Section 4.4.7 'Variables plans for bulk materials', second last paragraph, first sentence. Suggested amendment 'Since bulk materials are continuous, parts of each sample can be mixed to form a composite sample.'

Commented [SM85R84]: Agree. Amended

[452]Example

[453]The CXS 193-1995 shows the breakdown of the total variation for aflatoxins in tree-nuts, with a focus on sampling, sample preparation and testing; the variation due to sampling includes both between and within segment variation. It should be noted that provisions for aflatoxins are expressed in terms of the average levels in a lot.

[454]

[455]

Table 1. Variances^a associated with the aflatoxin test procedure for each treenut

Test procedure	Almonds	Hazelnuts	Pistachios	Shelled Brazil nuts
Sampling ^{b,c}	$S_s^2 = (7\ 730/ns) 5.759C^{1.561}$	$S_s^2 = (10\ 000/ns) 4.291C^{1.008}$	$S_s^2 = 8\ 000/ns) 7.913C^{1.475}$	$S_s^2 = (1\ 850/ns) 4.8616C^{1.898}$
Sample Prep ^d	$S_{sp}^2 = (100/nss) 0.170C^{1.648}$	$S_{sp}^2 = (50/nss) 0.021C^{1.548}$	$S_{sp}^2 = (25/nss) 2.334C^{1.522}$	$S_{sp}^2 = (50/nss) 0.0306C^{0.832}$
Analytical ^e	$S_a^2 = (1/na) 0.0484C^{2.0}$	$S_a^2 = (1/na) 0.0484C^{2.0}$	$S_a^2 = (1/na) 0.0484C^{2.0}$	experimental $S_a^2 = (1/n) 0.0164C^{1.117}$ or FAPAS $S_a^2 = (1/n) 0.0484C^{2.0}$
Total variance	$S_s^2 + S_{sp}^2 + S_a^2$	$S_s^2 + S_{sp}^2 + S_a^2$	$S_s^2 + S_{sp}^2 + S_a^2$	$S_s^2 + S_{sp}^2 + S_a^2$

[456]

[457] S_s^2 , S_{sp}^2 and S_a^2 , denote the variance associated with the sampling, sample preparation and analytical steps, respectively.

[458]

[459]A sampling plan is defined in terms of laboratory sample size ns , test portion size nss and the number of aliquots na (i.e. the number of analytical samples taken from each subsample). The information in this table can be used to design an optimal sampling plan in terms of total cost for a specified consumer's risk at a given concentration C . Obviously, the costs associated with each step need to be known to derive a cost-optimal plan.

[451]

[460]Since bulk materials are continuous, parts of each sample can be mixed to form a composite sample. This composite is then tested only once, rather than having to perform many tests on the individual samples. This is a physical way of creating a sample representing the average content per lot or segment. This averaging causes a reduction in the apparent variation meaning that adjustment of the acceptance criterion may be required for assessments against minimum or maximum limits.

[461]Note however, that the use of composite sampling adds complexity to the design of a general sampling strategy due to the statistical complexity of modelling the mixing process; assuming that composites made up from many individual portions can be thoroughly mixed is possibly unrealistic.

4.4.8 [462]Variables plans for the average level

[463]Sampling plans for bulk materials are often used to assess compliance of the average level of a characteristic. In some cases, such as in the sampling plans for aflatoxins in CXS 193-1995⁸, these plans are used in conjunction with offsets (refer section 3.2.3) to provide consumer protection.

[465]Other procedures for the inspection of the average level of a lot such as those in ISO 10725 are available that consider costs to derive plans that are economical to apply, although these plans might not be suitable in cases where a more precise determination of the average level is required.

[466]Plans for the average level might also be applicable where the product is homogenized through blending or further processing.

4.4.9 [467]Variables plans for percentage nonconforming (minimum or maximum limits)

[468]The strategy is similar to the design of variables plans for the average level except that an additional allowance should be made for variation within the lot, obtainable from the statistical analysis described in section 4.4.5. A simpler approach is to estimate within lot variation as the variation among the segments by taking one sample from each segment and testing those samples in duplicate to allow

Commented [J86]: Proposed Change (39) by Japan (22 May 2023 2:18)
Should instead of must should be used.

Commented [SM87R86]: Agree. Amended

[464]⁸ General standard for Contaminants and Toxins in food and feed (CXS 193-1995)

adjustment for measurement uncertainty, although this will not provide any information on other components of variation:

- [469]the acceptance criterion has the same form as a conventional variables plan applied to homogeneous lots
- [470]the number of samples n and the acceptability constant k can be found by trial and error, assessing the probabilities of acceptance against various alternative models for the behaviour of the characteristic in the lot. This should recognise that the formation of the segments might not reflect the disposition of nonconforming product within the lot.

4.4.10[471] Variables plans for compositional proportions (measurement uncertainty negligible)

[472]Compositional characteristics are often quality measures for bulk materials. For example, the milkfat percentage with a minimum limit of 26 % is a primary quality measure for whole milk powders⁹.

[474]Compositional proportions, also referred to as mass fractions, are characterized by units of measure such as percent (of mass), mg/kg, µg/100g and the like, which are, strictly speaking, 'dimensionless' numbers lying between 0 and 1.

[475]Compositional proportions can be modelled using the beta distribution. Variables sampling plans based on the normal distribution can only be approximate for compositional proportions and can lead to a higher consumer's risk than desired.

[476]Sampling plans for compositional proportions are defined by two parameters, m , the number of samples to be taken from the lot and k , the acceptability constant defined in the same way as for the usual variables sampling plans. In order to design such plans, in addition to PRQ, CRQ etc., an estimate of the 'precision parameter' for the beta distribution, denoted by θ , is required. This estimate can be obtained from the analysis of historical data.

[477]When using these plans, the m samples are taken from the lot and can be tested individually or combined (blended, well mixed etc.) to form a composite sample that needs to be tested only once.

[478]The average level P is taken as either the average of the m results from the testing of the individual samples or the single result from the testing of the composite sample.

[479]A feature of the beta distribution is that its standard deviation depends on the average level, enabling an assessment to be conducted using a single test of a composite sample taken from the lot. The standard deviation is calculated using the formula:

$$[480]s = \sqrt{P(1-P)/\theta}$$

[481]where θ is the precision parameter for the beta distribution, estimated from historical data (see above).

[482]The lot is accepted against an upper limit U provided $P + k \times s \leq U$ and similarly for a lower limit.

5 [483] Inspection error and measurement uncertainty

[Inspection] error relates to inspection by attributes, and measurement uncertainty relates to inspection by variables.

[484]Non-negligible analytical measurement uncertainty and inspection error have the potential to affect the probabilities of acceptance of a sampling plan. Accordingly, non-negligible analytical measurement uncertainty or inspection error should be taken into account in sampling inspection.

[485]It has been shown theoretically that analytical measurement uncertainty and inspection errors affect the producer's risk more than they affect the consumer's risk, i.e. the increase in producer's risk (rejecting a lot of acceptable quality) exceeds the increase in consumer's risk (accepting a lot of unacceptable quality). Accordingly, in the interests of fairness, it is important that appropriate allowances are made for non-negligible measurement and inspection errors.

[486]Acceptance sampling plans can be designed to allow for non-negligible analytical measurement uncertainty and inspection error.

[473]⁹ Standard for Milk Powders and Cream Powders (CXS 207-1999)

Commented [EU88]: Comment (74) by European Union (26 May 2023 12:13)

Chapter 5 is - perhaps by the nature of the subject - quite complex. As it deals primarily with the application of acceptance sampling in certain exceptional situations, it could be moved to the e-book, where more explanations could be given and illustrated through suitable examples.

Commented [SM89R88]: NZ/Germany have reviewed and amended this section. As well as reducing the size and removing detail that will be included in the Information Document, there have been updates in response to Eurachem comments.

Commented [SM90]: NZ/Germany

Commented [J91]: Proposed Change (40) by Japan (22 May 2023 2:18)
Should should be used instead of must

Commented [SM92R91]: Agree. Amended

5.1 [487]Attributes Plans

[488]In the context of attributes plans, 'inspection error' refers to random errors of misclassifying conforming items as nonconforming and vice versa.

[489]Inspection errors occur when testing an item for conformance and can be caused by human error, instrument error, or any other measurement related errors.

[490]There are two types of inspection errors:

- [491]Type I errors (e_1) occur when conforming items are classified as nonconforming
- [492]Type II errors (e_2) are when nonconforming items are classified as conforming.

[493]When inspection errors are present, they generally cause a greater increase in producer's risk than consumer's risk. For a single sampling plan, Type I errors (e_1) have a greater effect on the OC curve than Type II errors (e_2).

[494]The true fraction nonconforming p and the observed fraction nonconforming p_e are related through the following equation:

$$[495]p_e = e_1(1 - p) + (1 - e_2)p$$

[496]The impact of inspection errors is particularly marked for zero acceptance number plans.

5.1.1 [497]Known inspection errors

[498]If the misclassification errors are known, i.e., if precise estimates of the misclassification errors are available, for example from a method validation study, the estimates of the Type I and Type II errors can be used to design a sampling plan to control producer's and consumer's risks to specified levels. This will inevitably lead to increased sample sizes.

5.2 [499]Variables Plans

[500]Measurement uncertainty provides information regarding the range of values that could reasonably be attributed to the measurand. As such, it constitutes an important measure of the quality or reliability of a test result.

[501]For a more comprehensive discussion of measurement uncertainty, refer to the Guidelines on Measurement Uncertainty (CXG 54-2004).

[502]It should be noted that the concept of measurement uncertainty as usually understood (and as discussed in the Guidelines on Measurement Uncertainty (CXG 54-2004)) relates to a single determination performed on a single sample. This is appropriate for conformity assessment, but not for acceptance sampling (refer section 2.2). The same holds for the procedure illustrated in Figure 1 in the Guidelines on Measurement Uncertainty (CXG 54-2004). In connection with acceptance sampling, it is important to take into account how the different measurement uncertainty components manifest themselves in the sampling and calculation procedures applied. This is discussed in section 5.2.4, below.

[503]The terms 'negligible' and 'non-negligible'¹⁰ are used to indicate whether or not allowances should be made for measurement uncertainty in acceptance sampling plans. In the ISO 3951 series, measurement uncertainty is considered non-negligible if it is greater than 10% of the *process* standard deviation (SD). In connection with the inspection of isolated lots, the same criterion can be applied, but replacing the *process* SD with the *lot* SD (refer section 3.2.6). However, the only definitive way to assess whether an adjustment for measurement uncertainty is required is to examine the OC curve for the proposed sampling plan in the presence of measurement uncertainty (refer section 2.3.1).

5.2.1 [505]Measurement uncertainty

[506]In order to clarify the role of measurement uncertainty in acceptance sampling, it is necessary to draw a distinction between *analytical* measurement uncertainty and the *sampling component* of (the total) measurement uncertainty. We start by reproducing the following definition from section 8 in CXG 54:

[507]A **laboratory sample** is a sample as prepared (from the lot) for sending to the laboratory and intended for inspection or testing

[504]¹⁰ The term 'significant' is also used

Commented [J93]: Comment (41) by Japan (22 May 2023 2:19)

Measurement Uncertainty has already been explained in CXG54, which has been just revised. Japan proposes to delete duplicated texts already included in CXG54, in order to make this guideline more focused text. We believe shorter guideline without duplication will be more helpful to users.

Commented [SM94R93]: Thank you for your comment. CXG54 explains measurement uncertainty as it is normally applied in conformity assessment, where the [total] MU is used to assess whether a measurand complies with a requirement; CXG 50 discusses the use of MU in sampling inspection where the components of MU are used. (A lot cannot be a measurand).

Commented [J95]: Comment (42) by Japan (22 May 2023 2:19)

This definition should be moved to definition section.

Commented [SM96R95]: Agree. Amended
Noting there are times when a definition should be retained in the text.

[508]Any sources which contribute to measurement uncertainty prior to the arrival of the laboratory sample in the laboratory can be considered components of sampling uncertainty:

- [509]the sampling procedure [and its implementation](#)
- [510]the variation of the characteristic of interest within the lot
- [511]the person(s) performing the sampling
- [512]subsampling steps (leading to the laboratory sample)
- [513]contributions due to storage and transportation conditions (prior to the arrival of the laboratory sample in the laboratory).

[514]Any sources which contribute to uncertainty within the laboratory can be considered components of analytical measurement uncertainty, for example:

- [515]subsampling steps performed on the basis of the laboratory sample, such as taking a test sample, test portion, etc.
- [516]sample preparation
- [517]contributions due to storage conditions (in the laboratory)
- [518]analytical steps
- [519]laboratory technician.

[520]In determining measurement uncertainty, it is important to take account of all relevant contributions, including all sampling and analytical sources.

[521]Role of measurement uncertainty in acceptance sampling

[In acceptance sampling, the aim is to decide whether to accept or reject the lot under inspection via the application of an acceptance criterion. The application of the acceptance criterion often includes an estimate of the lot standard deviation, which is a measure of the random variation of the characteristic within the lot under inspection. It is important to ensure the estimate of the lot standard deviation is not affected by uncertainty sources. Accordingly, the role of measurement uncertainty in acceptance sampling can be described as follows:](#)

Measurement uncertainty may affect the estimate of the lot standard deviation. If this effect is non-negligible and thus impacts the consumer and producer risks, then the estimate of the lot standard deviation must be corrected for the non-negligible measurement uncertainty.

[In theory, the estimate of the lot standard deviation can be affected by both sampling and analytical components of measurement uncertainty. It should be noted, however, that while analytical uncertainty will always inflate the lot standard deviation estimate, the effect of sampling components can be either to increase or decrease its value. For this reason, correcting the estimate of the lot standard deviation for analytical uncertainty will always consist in 'subtracting' the uncertainty contribution and can thus be considered more readily achievable than a correction for sampling uncertainty components. The focus in this guidance document thus lies on correcting for non-negligible *analytical* uncertainty. Notwithstanding, it should be ensured sampling procedures are adequate. The use of statistically-based random sampling or validated sampling procedures is desirable. It should also be noted that any impact of analytical or sampling uncertainty on the lot standard deviation estimate can be disregarded as long as the corresponding standard deviation is less than 10 % of the lot standard deviation.](#)

Procedures for correcting the lot standard deviation for non-negligible analytical measurement uncertainty and sampling uncertainty are discussed in the following sections (refer section 5.2.6).

5.2.2 [538]General discussion of bias

[539]Measurement uncertainty consists, on the one hand, of components that reflect random effects (varying randomly with each test result) and, on the other hand, of components that reflect systematic effects (remaining constant across test results).

[540]A systematic effect is commonly referred to as a bias.

Commented [SM97]: NZ/Germany

Commented [J98]: Proposed Change (51) on footnote by Japan (24 May 2023 8:36)
This text conflicts with the definition of Measurement Uncertainty in CXG-54, in which measurement uncertainty does not include uncertainty from sampling.

Commented [SM99R98]: This [522] comment has been deleted.
We also note that the text relating to the lot standard deviation has been reviewed and shortened

Commented [J100]: Comment (72) on footnote by Japan (26 May 2023 4:55)
We propose to include more explanation to help users, who are not familiar with sampling, to understand.

Commented [SM101R100]: This [523] comment has been deleted.
In general MU could include components due to sampling and analytical uncertainty; CXG 54 considers only the analytical components.

Commented [RK102]: Eurachem

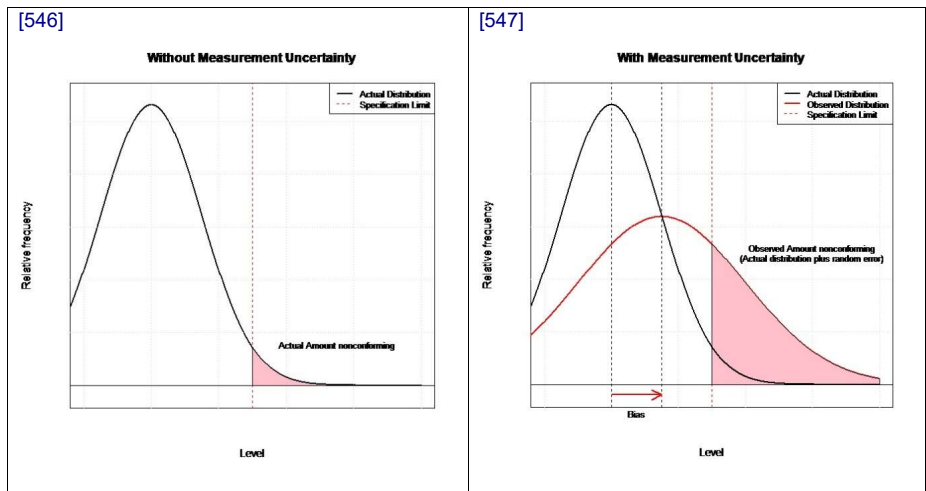
[541]In principle, if a bias is observed, it is corrected for; and it is the *uncertainty of the bias correction* which is taken into account in the measurement uncertainty.

[542]In practice, a bias may affect test results even after a *bias correction* is performed. This is the case, for example, if the bias correction is adequate for a given matrix, but not for another.

[543]There may be various sources of bias. The analytical method itself may have a bias. In addition, the method bias may vary from one matrix to the next. In this sense, matrix effects (or a 'matrix bias') may be observed. The method bias may vary from one laboratory to the next. In this sense, laboratory effects (or a 'laboratory bias') may be observed. Finally, there may also be a sampling bias, e.g. a given sampling procedure may consistently underestimate the lot mean or the lot standard deviation.

[544]It is often possible to obtain an estimate of the magnitude of a bias even in the absence of information regarding the 'true value'. For instance, the 'between-laboratory' component of reproducibility precision, calculated on the basis of data from a collaborative study, and typically expressed as a standard deviation, characterizes the magnitude of the laboratory bias. Similarly, there are procedures for estimating laboratory bias on the basis of Quality Control data or Proficiency Test results which can be used to characterize the magnitude of the laboratory bias.

[545]The following diagram shows the distribution and the percent nonconforming in a lot in the case that there are neither random effects nor bias (referred to as an 'error free' plan), and the effect which random effects and bias can have on the observed distribution and the apparent percentage nonconforming in a lot. This diagram thus shows the effect that random effects and bias can have on the probability of acceptance of a lot, unless such effects are adequately accounted for.



[548]

5.2.3 [549]Top-down approach for determining measurement uncertainty: the ISO 5725-2 model

[550]In many cases, an estimate of analytical measurement uncertainty is supported by precision data from an inter-laboratory method validation study (collaborative study) calculated on the basis of the simple design from the ISO 5725-1 and ISO 5725-2 standards. This design allows two precision components to be calculated:

- [551]one component reflecting *random effects* under near identical conditions within a given laboratory, referred to as the repeatability component
- [552]one component reflecting *laboratory bias*, referred to as the between-laboratory component.

Commented [J103]: Comment (69) on footnote by Japan (26 May 2023 4:40)
 The term "approaches", instead of "model", is used in paras 12-13 of CXG54. For consistency with CXG54, we suggest to revise the sentence as follows: "For common top-down approaches, see the General guidelines on Measurement Uncertainty (CXG 54-2004)".

[553] The underlying statistical model is not the most general model¹¹, but many collaborative studies are conducted in accordance with ISO 5725-2. For this reason, the following sections will return to the two components of the ISO 5725-2 design.

Commented [SM104R103]: Agree. The [554] footnote has been amended.

[555] *Note:* The 'between-laboratory' component in ISO 5725-2 characterizes the range of laboratory bias under repeatability conditions. ISO 5725-3 includes other designs, which allow a separate estimation of repeatability precision, intermediate precision (factorial effects) and residual laboratory bias.

5.2.4 [559] The acceptance criterion

[560] The acceptance criterion in a variables plan often takes the form:

$$[561] \bar{x} + k \cdot s \leq USL,$$

[562] where \bar{x} is the average value of the test results obtained from the inspection, s is their standard deviation and USL denotes the upper specification limit.

[563] Ideally, the standard deviation s is a reliable measure of the variation of the characteristic of interest within the lot. However, in practice, s may include other components, such as, analytical measurement uncertainty.

- [567] The mean value \bar{x} is calculated from several test results. When taking measurement uncertainty into account in the acceptance criterion, it is thus necessary to consider how averaging affects the different components of analytical measurement uncertainty.

[571] As far as the two components from the ISO 5725-2 model discussed above:

- [572] averaging across n test results will reduce the repeatability component by a factor of \sqrt{n}
- [573] however, averaging across n test results will not reduce the between-laboratory component.

[576] In the absence of fundamental variability, the lot standard deviation from a *single* test result obtained from a *well-mixed* composite sample obtained from n increments is reduced by \sqrt{n} .

5.2.5 [577] Laboratory bias in acceptance sampling

[578] In connection with acceptance sampling, the following should be noted:

- [579] if information regarding laboratory bias is available in the form of a between-laboratory standard deviation from an interlaboratory study conducted according to ISO 5725-2, then measurements during lot inspection should be performed under repeatability conditions, with the bias, represented by the between-laboratory standard deviation, taken into account in the sampling plan.
- [580] matrix effects (variation of bias across matrices within the scope of the method) can affect the test results differently in different laboratories (see the Guidelines on Measurement Uncertainty (CXG 54-2004), sections 10, 12 and 15. This means that an estimate of the between-laboratory variation may be valid for a given matrix, but not for another. An estimate of the bias across different matrices can be obtained by means of an in-house experiment. If such an estimate is available, it should be taken into account in the sampling plan

[581] if an estimate of the between-laboratory standard deviation is available, it is important to consider whether it constitutes a reliable characterization of the variation of laboratory bias, in the sense that the estimate was obtained on the basis of data from a sufficiently large number of laboratories (see the Guidelines on Measurement Uncertainty (CXG 54-2004), sections 16, 17 and 18).

5.2.6 Within-item variation

For the case of lots consisting of discrete items, one uncertainty source deserves special attention: **within-item variation**. Typically, one measurement value is obtained per item, and the lot standard deviation is calculated on the basis of these item-specific values. Each measurement value is intended to represent the mean concentration of the given item. However, the lot standard deviation calculated in this manner may be inflated by within-item variation. There are two cases to consider.

[554]¹¹ For common top-down approaches, see the Guidelines on Measurement Uncertainty (CXG 54-20004)

Case 1 – subsampling prior to the arrival of the sample in the laboratory

In this scenario, there is a sub-sampling step between item selection and the arrival of the laboratory sample in the laboratory, and this sub-sampling step causes non-negligible deviations between laboratory samples from one and the same item (if several laboratory samples were taken from the same item). Note that in this case, the lot standard deviation will be inflated by a sampling (rather than an analytical) component of measurement uncertainty. Correcting for this type of overestimation of the lot standard deviation presents practicability issues and is not typically contemplated. This case is mentioned here merely for the sake of completeness.

Case 2 – subsampling within the laboratory

In this scenario, sub-sampling inside the laboratory causes non-negligible deviations between test portions taken from the same laboratory sample (item). Conceptually, this component belongs to analytical rather than sampling measurement uncertainty. An estimate thereof can be obtained via a 'duplicate' experimental design, where two test portions per laboratory sample (item) are analyzed. If a validation study is conducted on the basis of certified reference material, it may not be possible to obtain an estimate of this component. Moreover, depending on the context, this component may or may not be considered to belong to a given method's precision. Accordingly, in some cases, an estimate for this component may not be available at all, or may only be available via studies conducted to determine sampling uncertainty rather than analytical uncertainty.

5.2.7 [582] Absence of laboratory bias

In order to ensure unbiased estimates, the estimate of the lot standard deviation must be corrected for any unwanted measurement uncertainty and subsampling components (as described under Case 2 in the previous section). In the absence of laboratory bias, it is possible to achieve this via a relatively simple procedure.

[583] If it can be assumed that:

- [584] there is negligible bias
- [585] the characteristic follows a normal distribution in the lot under inspection
- [586] repeatability effects follow a normal distribution

[587] then the following approach can be applied.

[588] The standard deviation s is adjusted by 'subtracting' the standard deviation representing the repeatability component of measurement uncertainty u :

[589] $s_{adj}^2 = s^2 - u^2$. The adjusted standard deviation is then used in the acceptance criterion:

[590] $\bar{x} + ks_{adj} \leq USL$. If the measurement uncertainty is greater than s , the adjusted standard deviation is set equal to zero.

If there is no subsampling variation, then the procedure described above is adequate.

Commented [RK105]: Eurachem

If the lot standard deviation is inflated by a subsampling component and u reflects this component, then the procedure described above is adequate.

If the lot standard deviation is inflated by a subsampling component (as described under Case 2 in the previous section) and if u does not reflect this component, then another approach can be used to adjust the lot standard deviation for both repeatability and the between-subsample variation. In particular, if every item is tested in duplicate, an adjustment for measurement uncertainty can be made for both subsampling variation and repeatability. In this case the observed standard deviation s calculated from all the data is adjusted by subtracting the quantity $\frac{1}{2}u^2$ where u is the standard deviation of the differences between the results for each pair of duplicate samples:

$$[595] s_{adj}^2 = s^2 - \frac{1}{2}u^2.$$

5.2.8 [596] Presence of laboratory bias

[597] We consider the case that an estimate of between-laboratory variation is available, e.g. from a validation study previously conducted in accordance with ISO 5725.

[598] This estimate is considered a measure of laboratory bias and is taken into account in the sampling plan.

[599] If the laboratory bias is relatively small allowance can be made using the techniques described in Annex B of ISO 3951-6. It is assumed that repeatability and laboratory-bias effects, as well as the characteristic, are normally distributed. While the acceptance criterion is of the same form as in the 'error-free' variables plans, in some circumstances it might not be possible to find a sampling plan (the number of samples n and the acceptability constant k) that controls producer's and consumer's risks in the manner intended.

[600] If the laboratory bias (i.e., the estimate of between-laboratory variation) is too large to apply the procedure from ISO 3951-6, then an adjusted specification limit USL_{adj} should be calculated as $USL_{adj} = USL - q \cdot s_L$,

where s_L denotes the estimate of between-laboratory variation (expressed as a standard deviation) and q denotes the appropriate quantile. If an estimate of the variation of bias across matrices s_{matrix} is available, then the adjusted specification limit should be calculated as

[601]

$$USL_{adj} = USL - q \cdot \sqrt{s_L^2 + s_{matrix}^2}.$$

5.2.9 [602] Fractional nonconformance

[603] If the characteristic does not follow a normal distribution (refer section 3.2.5), plans based on Fractional Nonconformance (FNC) can be used to allow for analytical measurement uncertainty.

[604] The FNC for a sample can be thought of as the probability that the true value of the sample exceeds the specification limit, allowing for any measurement uncertainty present.

[605] A sampling plan based on the FNC adjustment principle is defined by two numbers, n , the number of samples to be taken and Ac , the maximum acceptance limit for acceptance of the lot. These two numbers are determined in the same manner as for other types of plans, namely, by considering the allowable risks at PRQ and CRQ. Additional information on the ratio between measurement uncertainty and lot SD is also required for the design of these plans.

[606] A lot is accepted provided the sum of the individual sample FNC values does not exceed the maximum acceptance limit.

$$[607] \sum_{i=1}^n FNC_i \leq Ac$$

[608] where FNC_i is the FNC value for the i^{th} sample ($i = 1 \dots n$).

[609] The use of FNC adjustment is preferred over approaches in which samples are classified as conforming or non-conforming against a specification limit or on a 'beyond reasonable doubt' basis taking measurement uncertainty in account. Such approaches are less economical in terms of sample numbers and might not be optimal in terms of controlling producer's and consumer's risks and need to be evaluated.

6 [610] Other Matters Relating to Sampling

6.1 [611] Physical Sampling

[612] The Theory of Sampling (refer section 4.4.2) relies on procedures that represent best practice for unbiased physical sampling from a lot. These sampling procedures should be observed with respect to each individual sample taken from a lot, and for any subsequent mixing and sub-sampling etc., noting that usually more than a single sample is required in acceptance sampling plans. Reference should be made to material-specific ISO or other standards for details of sampling procedures for different commodities. Adherence to specified sampling procedures might be a legislative or regulatory requirement for some commodities in some jurisdictions.

6.1.1 [613] Random sampling

[614] For lots consisting of discrete items, random sampling means that each item has an equal chance of being selected in the sample. The assumption of random sampling allows the Operating Characteristic to be calculated; deviating from random sampling might mean that the plan does not control the producer's or consumer's risks as might have been intended. In many cases systematic sampling, taking samples at regularly spaced intervals throughout a lot, will suffice as a substitute for true random sampling.

[615] It is common for lots to be 'layered', individual items might (say) be packed in cartons, there might be several (but the same number) of these smaller cartons packed into a larger carton, and several (but the same number) of the larger cartons packed on a pallet. Selecting a random sample of size *n* items would proceed as follows:

- [616] select *n* pallets from the number of pallets in the lot (the same pallet can be selected more than once)
- [617] select a random larger carton from the cartons on each side of the selected pallets
- [618] select a smaller carton from each of the larger cartons that have been selected
- [619] finally, select an individual item from each of these smaller cartons – these constitute the sample which will be tested or examined.

[620] For bulk materials taking a random sample is more difficult. Many lots of bulk materials can be considered as a collection of segments; stratified random sampling is used in which, in the simplest case, segments are selected at random from the total number of segments, then within each segment that has been chosen a random sample of increments is taken.

[621] This is discussed in more detail in section 4.4.

[622] In principle there is no need for random sampling for well-mixed fluids or bulk products; however random sampling might still be used as a precaution against inhomogeneity or for procedural reasons.

6.1.2 [623] Convenience sampling

[624] Convenience sampling is often referred to as pragmatic sampling. It involves taking samples, and sometimes only a single sample, from a part of a population that is convenient to sample and is often used due to low cost. It is a form of *ad hoc* sampling that is sometimes used in pilot testing.

[625] There are usually more disadvantages than advantages with convenience sampling. There is a possibility of sampling error and lack of adequate representation of the population, and furthermore, use of convenience sampling might lead to disputes as it is neither a fair nor a valid procedure.

6.2 [626] Reinspection

[627] When the results of the original inspection of a given lot are considered suspect due to sampling, lot reinspection can be carried out, [subject to agreement between the parties](#). Reinspection is therefore a possible option that could be used for the resolution of disputes. It is important, if possible, to rule out other causes before concluding that faulty sampling is the cause.

[628] The Guidelines for Settling Disputes on Analytical (Test) Results (CXG 70-2009) provide the following advice:

[629] *Possible reasons for disagreement may include one or several causes such as: the existence, appropriateness and statistical validity of the sampling plan used to assess the product; the allowances made for normal measurement error and within-lot product variation; differences in physical sampling procedures; differences in composition of the samples tested due to product inhomogeneity or changes occurring during storage and/or transport of the product.*

[630] Reinspection involves the lot being resubmitted for inspection, with the decision regarding acceptance or rejection based on a new sample. This process can be repeated; the design of the sampling plan used for each new reinspection depends on the number of reinspections allowed.

[631] There may be perfectly legitimate reasons to raise doubts concerning the results of the original inspection results:

- [632] acceptance sampling plans assume lot homogeneity, which, in turn, often requires random sampling (refer section 3.2.7). Since random sampling of pre-packaged commodities from large containers is difficult, it is natural for the producers or consumers to occasionally distrust or dispute the sampling procedure
- [633] the use of sampling plans based on relatively small sample sizes can result in high risks of incorrect acceptance or rejection.

[634] Accordingly, there are situations in which reinspection should be performed in the interest of fairness. However, if an appropriate sampling procedure has been properly applied then evidence should be brought forth to justify the need for reinspection.

Commented [J106]: Proposed Change (56) by Japan (24 May 2023 9:34)

We propose to delete the sentence. If both parties agree with using a convenience sampling, we do not expect any disputes about it, which is the utmost advantage in the trade.

Commented [RK107R106]: NZ considers that this text could be retained.

Just because two parties might agree on a procedure does not mean there will not be disputes. Use of the guidelines and apps will reduce the chance that an usable plan might be agreed between the parties.

Commented [J108]: Comment (44) by Japan (22 May 2023 2:22)

Inclusion of reinspection in the guidelines on sampling is not appropriate because reinspection is related not only to sampling but to whole testing process. In addition, Codex has already developed a guideline on settling dispute over analytical values (CXG70), so that duplication is not appropriate.

We propose to delete this section. Otherwise, in line with CXG70, we propose to include at the beginning of the paragraph as follows: Reinspection in this text can be applicable if both parties agree on using this guideline.

Commented [RK109R108]: Agree, additional text has been added into this section.

There is no duplication as explained above, CXG70 provides a procedure for resolving disputes due to analytical differences but there are other possible causes of disputes (e.g. as listed in the footnote on p1 of CXG70) for which reinspection might be appropriate.

Commented [A110]: Comment (13) by Australia (22 May 2023 1:18)

11. Section 6.2 'Reinspection', second last dot point. Suggested amendment '• the lot may have been rejected due to an inappropriate sampling procedure or poor sampling practice, or'.

Commented [SM111R110]: Agree. Amended.

[635] Reinspection schemes are particularly useful for zero acceptance number sampling plans or for variables plans with small sample sizes and large k values such as $k=2$. It is well known that such plans generally involve higher risks to producers. Hence, the use of reinspection allows producers to opt for reinspection of a lot when:

- [636] the lot may have been rejected due to an inappropriate sampling procedure or poor sampling practice, or
- [637] there is good process history to believe that the quality of the lot is indeed good.

6.3 [638] Inhomogeneous lots

[639] While section 3.2.4 discusses the *conditions under which* a lot can be considered homogeneous, this section addresses the question *how to handle* cases of inhomogeneous lots consisting of discrete items. For more information on sampling of inhomogeneous lots consisting of bulk materials, refer to section 4.4.

[640] Most sampling plans are based on the assumption that the lots are homogeneous. Use of these plans with inhomogeneous lots will usually increase producer's risks and consumer's risks, so that consumer protection may be compromised.

[641] Lots may be inhomogeneous because inspection lots differ from manufacturing lots. Accordingly, one approach may be to split a given inhomogeneous inspection lot into sublots in line with production lots or other standardized manufacturing processes. Each of the sublots might then be sufficiently homogeneous to be inspected using standard attributes or variables sampling plans, inspecting each subplot with the same plan that would have been used for the entire lot, had it been homogeneous. However, lots should not be split into sublots based on results obtained from earlier testing.

[646]APPENDIX I

[647]GUIDE TO THE SELECTION AND DESIGN OF SAMPLING PLANS

1 [648]Introduction

[649]This Appendix provides a high level summary of the principles relating to the design of sampling plans and to the various types of sampling plans discussed in the main document.

[650]It has been structured in a way that allows users to follow the process for the design of a sampling plan from first principles to quickly identify options for sampling plans that are relevant to a particular situation in which sampling is to be undertaken.

[651]Links are provided that allow users to quickly access further information about particular sampling options in the main document.

1.1 [652]Selection of Options for Sampling Plans

[653]

[654]A. Determine Sampling Plan Options

[655]

[656]Step 1. Type of data

[657]Are the test results expressed as pass/fail outcomes (or equivalent) or are they measurements?

[658]

[659]Pass/Fail (or equivalent) outcomes (Attributes)

[660]Go to step 2

[661]Measurements (Variables)

[662]Go to Step 3

[663]

[664]Help on attributes data

[665]Help on variables data

[666]Step 2. Attributes data

[667]Is the inspection error negligible or non-negligible?

[668]

[669]Negligible

[670][CXG50 4.2](#)

[671]PR & CR

[672]

[673]

[674][CXG50 4.2.3](#)

[675]CR only

[676]SO2

[678][CXG50](#)

[680]SO2

[677]

[Appendix II](#)

[679]PR only

859-1

[681]Non-negligible

[682]

[683]

[684]

[685]

[686][CXG50 5.1.1](#)

[687]Known Inspection errors

[688]

[689]

[690][Help on Design of Attributes Plans](#)

[691]

[692]

[693]Step 3. Variables data

[694]Does the provision relate to compliance of the distribution or to the average level of the characteristic?

[695]

[696]Step 3.a. Plans to assess compliance of the distribution

[697]Is the characteristic normally distributed, a compositional characteristic or does it follow some other distribution?

Commented [EU112]: Comment (75) by European Union (26 May 2023 12:14)
Appendix I guides users through the work flow for the selection of sampling plans appropriate for the most common use cases of Codex Commodity Committees. The provided examples highlight the high number of samples that need to be tested if PRQ and CRQ are maintained at low levels of nonconforming items. Even if user will have the opportunity to ‘experiment’ with the ShinyApps in the e-book to find solutions requiring a lower number of samples, certain ‘prefabricated’ plans from the ISO standards should be offered for the orientation of less experienced users (e.g., by referring to the ISO plans in Annex II).

Commented [RK113R112]: The examples document contains examples of sampling plans based on the ISO plans; it does not contain plans that control both producer’s and consumer’s risks in their design and it is assumed that the analytical measurement uncertainty is negligible [non-negligible analytical uncertainty is not addressed in the current GL 50 standard].

All the plans in the examples document could be evaluated using the apps, App1 since the analytical MU is considered negligible.

Commented [P114]: Comment (83) by Philippines (30 May 2023 3:53)
1.1 Selection of Options for Sampling Plans will be easier understood if presented as decision tree
Rationale:
Pls. refer to the next page Figure 1. Decision Tree (word file submitted)

Commented [RK115R114]: For consideration by the in-session WG.

Commented [P116]: Comment (82) by Philippines (30 May 2023 3:46)
a. “1.Type of data” should be “Nature of the Provision” Does the provision apply to the overall distribution (most of the lot must comply) or to the average level?

b. “2. Type of data” and so on..
This is demonstrated in the given examples 1 and 2 on page 38 and 40

Rationale:
1.1 Selection of Options for sampling Plan Options

A. Determine Sampling Plan Options
1. Nature of the Provision

Does the provision apply to the overall distribution (most of the lot must comply) or the average level?

Overall Distribution Go to step 2
Average Level Go to Step 9

then adjust the succeeding numbers

Commented [RK117R116]: Type of data relates to whether the data is attributes or variables whereas the nature of the provision relates whether the limit applies to the overall distributions or the average level.

[698]
 [699]Normally distributed [700]Go to step 4
 [701]Compositional Proportion [702]Go to step 6
 [703]Some other distribution [704]Go to step 7
 [705]
[\[706\]Help on Design of Variables Plans](#)
 [707]
[708]Step 3.b. Plans for the average level
 [709]
 [710]Plans for the Average level [711]Go to step 8 [712] [713]
 [714]
[\[715\]Help on provision](#)
[\[716\]Help on average level](#) [718] [719] [720]
 [717] 8

[721]Step 4. Variables plans, normally distributed characteristics

[722]Is measurement uncertainty negligible or non-negligible?

[723]
 [724]Negligible [725][CXG50 4.3.3](#) [726]PR & CR [727] [731]ISO3
 [728] [729][CXG50 4.3.4](#) [730]CR only 951-6
 [732] [Appendix 2](#) [733][CXG50](#) [734]PR only [735]ISO3
 [736]Non-negligible [737]Go to step 5 951-1
 [738]
[739]Step 5. Variables plans, normally distributed characteristics, non-negligible measurement uncertainty

[740]Is the measurement uncertainty normally distributed or does it follow some other distribution?

[741]
 [742]Normally distributed [743][CXG50 5.2.7](#) [744]PR & CR [745] [749]ISO3
 [746] [747][CXG50 5.2.5](#) [748]CR only 951-6
 [750]Some other distribution [751][CXG50 5.2.8](#) [752]PR & CR [753]
 [754]
[755]Step 6. Compositional Proportions

[756]Is measurement uncertainty negligible or non-negligible?

[757]
 [758]Negligible [759][CXG50 4.4.10](#) [760]PR & CR [761]
 [762]Non-negligible [763]Go to step 5 [764] [765]
 [766]
[767]Step 7. Characteristic is neither normally distributed nor a compositional proportion

[768]Is the measurement uncertainty negligible or non-negligible?

[769]

[770]Negligible [771][CXG50 4.2.7](#) [772]PR & CR [773]
 [774]Non-negligible [775][CXG50 5.2.8](#) [776]PR & CR [777]
 [778]
 [779]Step 8. Provision is expressed in terms of the average level in a lot

[780]Is the measurement uncertainty negligible or non-negligible?

[781]
 [782]Negligible [783][CXG50 4.4.8](#) [784]PR & CR [785]
 [786]Non-negligible
 [787][no information provided] [788] [789] [790]
 [791]

[792]B. Specify Stringency for the Sampling Plan
 (plans to assess compliance to minimum or maximum levels)

[793]
 [794]Consumer's Risk Quality level (CRQ) [795] [796]

[797]What percentage nonconforming (quality level?) would you allow in lots that you would want to **reject** most of the time? [798]6.5%

[799]
 [800]Consumer's Risk (CR) [801] [802]

[803]What consumer's risk are you prepared to allow, i.e., how often would you want to accept lots containing 6.5% nonconforming? [804]10%

[805]
 [806]If the characteristic is a 'serious' food safety (or other) concern [807]
 [808]• It might not be appropriate to control producer's risks explicitly [809]
 [810]• Use ISO plans (or alternatives) that control only the consumer's risk [811]
 [812]If the characteristic is not a 'serious' food safety or other concern, it is appropriate to also control the producer's risk [813]
 [814] [815]

[816]
 [817]Producer's Risk Quality level (PRQ) [818] [819]

[820]What percentage nonconforming (quality level?) would need to be present in lots that you would want to **accept** most of the time? [821]5.0%

[822]
 [823]Producer's Risk (PR) [824] [825]

[826]What producer's risk are you prepared to allow, i.e., how often would you want to reject lots containing 5.0% nonconforming? [827]5%

[828]
 [829]C. Evaluate Plan to Determine Plan Parameters and Calculate Operating Characteristic

[830]

[831]Determine the number of samples and the acceptance number (attributes plans) or the acceptability constant (variables plans)

[832]

1.1.1 [833]Attributes sampling plan example

[834]Using Codex Standard CXS 207-1999 for Milk and Cream Powders as an example.

[835]These examples are hypothetical, some of the scenarios are artificial and may not reflect reality.

[836]

[837]Example 1: Scorched particles in wholemilk powder

[838]

[839]The characteristic scorched particles is included in CXS 207-1999 as an additional quality factor. The standard says that a sample is considered to conform if it is assessed as being 'Disc B' at a maximum.

[840]

[841]1. Nature of the Provision

[842]Does the provision apply to the overall distribution (most of the lot must comply) or to the average level?

[843]

[844]Overall Distribution

[845]Go to step 2

[846]Average Level

[847]Go to Step 9

[848]

[849]This parameter applies to the overall distribution of the product.

[850]

[851]2. Type of data

[852]Are the test results expressed as pass/fail outcomes (or equivalent) or are they measurements?

[853]

[854]Pass/Fail outcomes (Attributes)

[855]Go to step 3

[856]Measurements (Variables)

[857]Go to Step 4

[858]

[859]Scorched particle 'scores' are attributes data, being either 'Less than or equal to Disc B' or exceeding 'Disc B'.

[860]

[861]3. Attributes data

[862]Is the inspection error negligible or significant?

[863]

[864]Negligible

[865]CXG50 [866]

4.2

[867]Significant

[868]CXG50 [869]

5.1.1

[870]

[871]It is assumed that measurement error is negligible for this example.

[872]

[873]Specify Stringency for the Sampling Plan

[874](plans to assess compliance to minimum or maximum levels)

[875]

[876]The last step is to decide on the required stringency for the sampling plan, how we want the sampling plan to control the producer's and consumer's risks.

[877]This can be done by answering the following questions. In most cases the default values of 10% for the probabilities of wrongly accepting product at the consumer's quality level and 5% for the probability of wrongly rejecting product at the producer's risk quality can be used so it is necessary to specify only the consumer's and producer's risk levels.

[878]Note the questions are expressed the other way round.

[879]

[880]Noting that scorched particles is an additional quality factor (characteristic), for the purposes of this example it is assumed that it is of lesser importance than the compositional characteristics so that the consumer's risk quality level could be set at 15%, and the producer's risk quality level at 5%.

[881]Consumer's Risk Quality level (CRQ)

[882]

[883]What percentage nonconforming would you allow in lots that you would want to reject most of the time?

[884]15%

[885]

[886]

[887]How often would you want to accept such lots?

[888]10%

[889]

[890]

[891]Producer's Risk Quality level (PRQ)

[892]What percentage nonconforming would need to be present in lots that you would want to accept most of the time?

[893] 4%

[894]

[895]

[896]How often would you want to reject such lots?

[897]5%

[898]

[899]

[900]The following image is an output from a sampling design app. In this example the only inputs required are selection of:

[901]- the 'attributes' option for the type of plan

[902]- the producer's risk quality level of 4%

[903]- the consumer's risk quality of 15%

[904]- (the default producer's and consumer's risks are 5% and 10% respectively).

[905]The required sampling plan to control the risks to these levels can be read from the table below the plot as (n = 60, c = 5), i.e., 60 samples need to be taken from the lot and tested, with the lot accepted provided no more than five of those 60 samples were found to be nonconforming, rated at more than 'Disc B'.

[906]However, this plan might be excessive from a practical point of view, considering that testing for scorched particles is manually intensive. Several options are available:

[907]- Re-design the plan using different settings for the producer's risks and consumer's risks

[908]- Use an 'off the shelf' plan, such as a plan from an ISO Standard

[909]- Decide not to carry out assessments of scorched particles

[910]The image below shows the Operating Characteristic for the plan (n=13, c=2) taken from the ISO Standard.

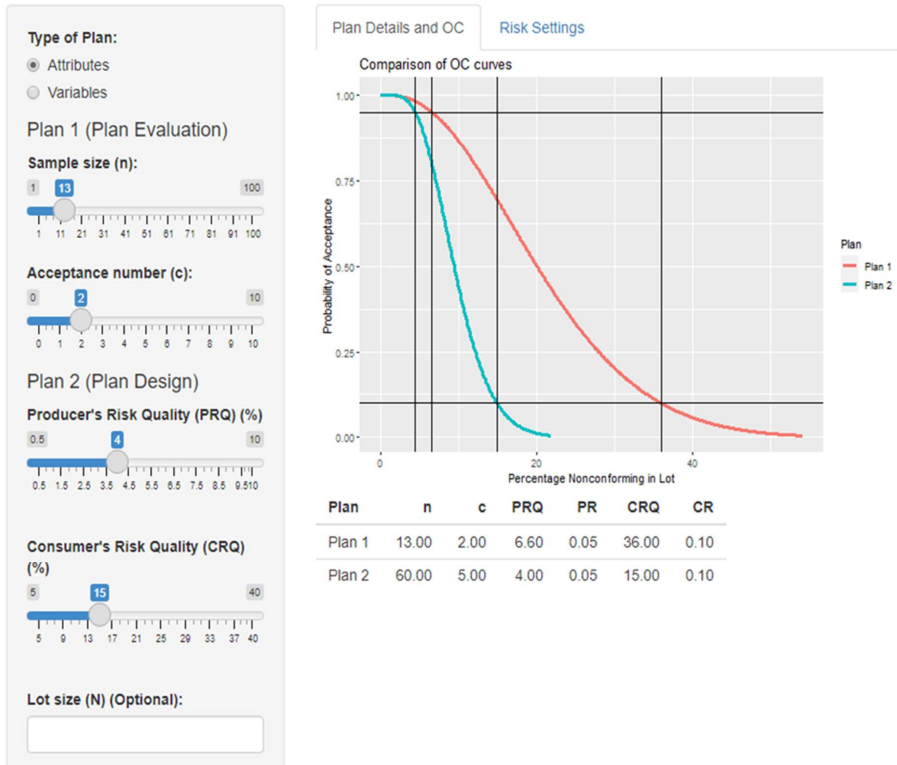
The table below the plot shows the producer's risk quality (PRQ) level of 6.6% and a consumer's risk quality (CRQ) of 36% so that there would be a 10% chance of accepting lots in which 36% of the product is nonconforming.

[911] A decision needs to be made whether this plan is suitable.

[912] This shows that it is important that 'off the shelf' sampling plans are evaluated prior to use to ensure that they will control the producer's and particularly the consumer's risk to satisfactory levels.

[913]

Design and Evaluation of Sampling Inspection Plans



[914]

[915] Variables sampling plan example

[916] Using Codex Standard CXS 207-1999 for Milk and Cream Powders as an example.

These examples are hypothetical, some of the scenarios are artificial and may not reflect reality.

[917]

[918] **Example 2: Moisture in wholemilk powder**

[919] The provision states that moisture should not exceed a maximum of 5%.

[920] In this example it is assumed that measurement uncertainty is negligible compared to the lot standard deviation, more details are given below.

[921]

[922]1. Nature of the Provision

[923] Does the provision apply to the overall distribution (most of the lot must comply) or to the average level?

[924]

[925] Overall Distribution

[926] Go to step 2

[927] Average Level

[928] Go to Step 9

[929]

[930] The provision is a maximum limit, so applies to the overall distribution of moisture within a lot.

[931]2. Type of data

[932] Are the test results expressed as pass/fail outcomes (or equivalent) or are they measurements?

[933]

[934] Pass/Fail outcomes (Attributes)

[935] Go to step 3

[936] Measurements (Variables)

[937] Go to Step 4

[938]

[939] Moisture is a measured parameter, so variables plans are the natural choice. Attributes plans could also be used since measurement uncertainty is negligible, although those plans would be less economical in terms of the number of samples required to be tested.

[940]3. Attributes data

[941] Is the inspection error negligible or significant?

[942]

[943] Negligible

[944] CXG5 [94
0 4.2 5]

[946] Significant

[947] CXG5 [94
0 5.2.1 8]

[949]

[950] CXG5 [95
0 5.2.2 1]

[952]

[953] As above measurement uncertainty is assumed to be negligible.

[954]4. Variables data

[955] Is the characteristic normally distributed, a compositional characteristic or does it follow some other distribution?

[956]

[957] Normally distributed

[958] Go to step 5

[959] Compositional Proportion

[960] Go to step 7

[961] Some other distribution

[962] Go to step 8

[963]

[964] For the purposes of this example and generally, it is assumed that moisture within a lot is normally distributed

[965]

[966]

[967] **5. Variables plans, normally distributed characteristics**

[968] Is measurement uncertainty negligible or significant?

[969]

[970] Negligible

[971] CXG5 [970] 4.2 2]

[973] Significant

[974] Go to step 6

[975]

[976] Measurement uncertainty is assumed to be negligible.

[977] **Specify Stringency for the Sampling Plan**

[978] (plans to assess compliance to minimum or maximum levels)

[979]

[980] The last step is to decide on the required stringency for the sampling plan, how we want the sampling plan to control the producer's and consumer's risks.
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[981]

[982] This can be done by answering the following questions. In most cases the default values of 10% for the probabilities of wrongly accepting product at the consumer's quality level and 5% for the probability of wrongly rejecting product at the producer's risk quality can be used so it is necessary to specify only the consumer's and producer's risk levels.

[983] Note the questions are expressed the other way round, e.g., the CRQ question relates to rejection, rather than to acceptance.

[984] In this example it is assumed that the consumer's risk quality level is 10%, possibly reflecting the milkpowders are a commodity product and the producer's risk quality level is 2½%.

[985]

[986] **Consumer's Risk Quality level (CRQ)**

[987] What percentage nonconforming would you allow in lots that you would want to <u>reject</u> most of the time?	[988] 10%	[989]
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[990]

[991]

[993] How often would you want to <u>accept</u> such lots?	[994] 10%	[995]
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[996]

[997] **Producer's Risk Quality level (PRQ)**

[998]

[999] What percentage nonconforming would need to be present in lots that you would want to <u>accept</u> most of the time?	[1000] 2.5%	[1001]
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[1002]

[1003]

[1004] How often would you want to <u>reject</u> such lots?	[1005] 5%	[1006]
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[1007]

[1008] **Plan Design**

[1009] As measurement uncertainty is negligible, the sampling plans can be designed using an app.

[1010] 1. Attributes Plans

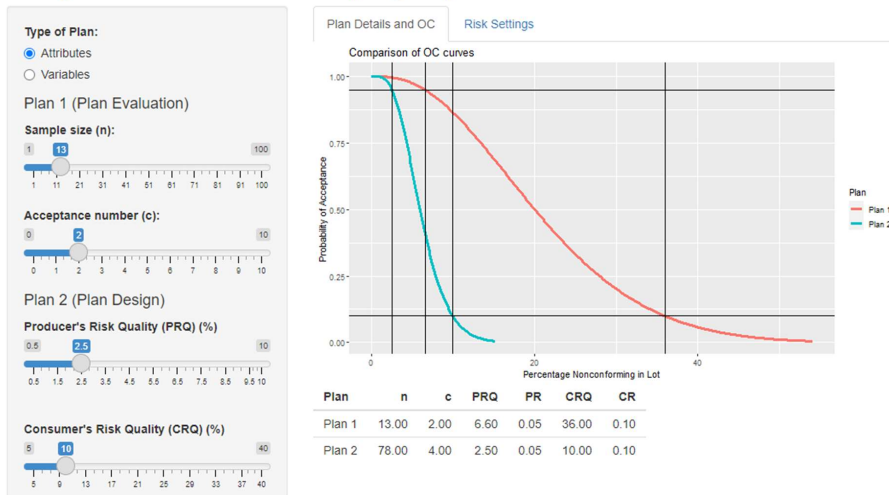
[1011] The following shows an image of the output from the app. In this example the only inputs required are selection of:

- [1012]- the 'attributes' option for the type of plan
- [1013]- the producer's risk quality level of 2.5%
- [1014]- the consumer's risk quality of 10%
- [1015]- the default producer's risks and consumer's risks are 5% and 10% respectively.

[1016]The required sampling plan to control the risks to these levels can be read from the table below the plot as (n = 78, c =4), i.e., 78 samples need to be taken from the lot and tested, with the lot accepted provided no more than four of those 78 samples was found to be nonconforming, having results greater than 5%.

[1017]

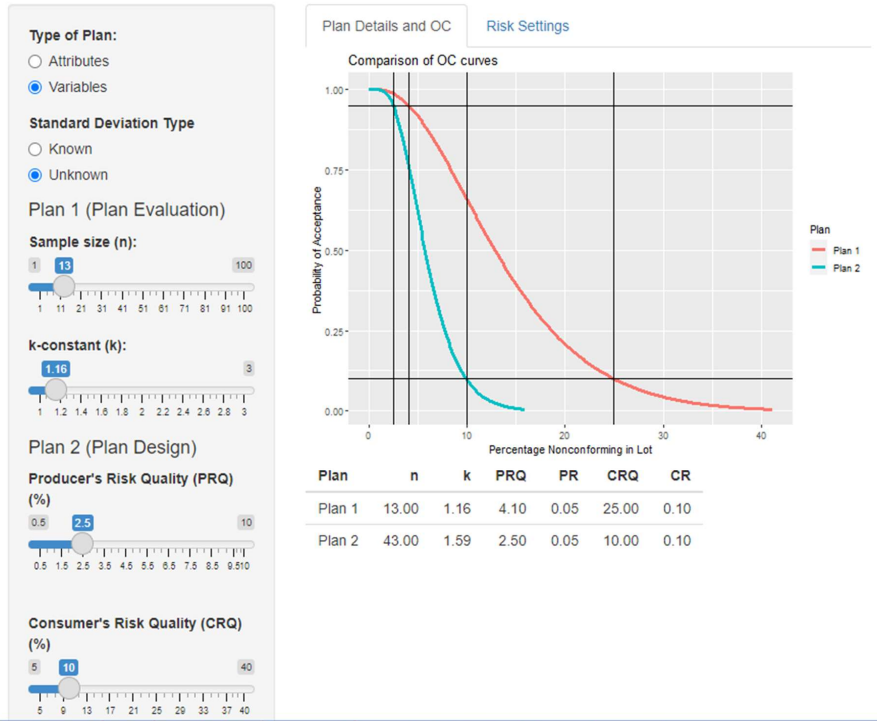
Design and Evaluation of Sampling Inspection Plans



- [1018]
- [1019]2. Variables Plans
- [1020]The following shows an image of the output from the app. In this example the only inputs required are selection of:
- [1021]- the 'Variables' option for the type of plan
- [1022]- the producer's risk quality level of 2.5%
- [1023]- the consumer's risk quality of 10%
- [1024]- the default producer's risks and consumer's risks are 5% and 10% respectively.
- [1025]We need to also specify whether the true standard deviation (sd) for the process that produced the batch is known or whether it is unknown and is estimated from the data obtained from sampling the lot, but it would be more usual for standard deviations to be unknown in inspections carried out by 'consumers'.

[1026]

Design and Evaluation of Sampling Inspection Plans



[1027]

[1028] The required sampling plan to control the risks to these levels can be read from the table below the plot as (n = 43, c = 1.59), i.e., 43 samples need to be taken from the lot and tested, with the lot accepted provided the average and the standard deviation of the results meets the acceptance criterion:

$$[1029] \bar{x} + 1.59s \leq 5$$

[1030] Where \bar{x} is the average of the 43 individual results and 's' is their standard deviation. It is assumed that the measurements are expressed as a percentage e.g., moisture of 5% on a weight/weight basis, rather than as a decimal (0.05).

1.1.2 [1031] Supporting material

[1032]Context	[1033]Term	[1034]Explanation
[1035]Nature of the provision	[1036]Provision n	[1037]A provision is a requirement for a commodity that must be met in order that the commodity conforms to the standard.
[1038]Nature of the provision	[1039]Overall distribution	[1040]Specification limits may be expressed as a minimum or a maximum limit (or both) applied to either the overall distribution of the characteristic in the lot, e.g., the percentage nonconforming quality level, or to the average level

[1041]Nature of the provision	[1042]Average level	[1043]In some cases, such as the net weight of packages, a limit is set on the average level, with the intention that the average level in the batch should not be less than the limit. In Codex, although an example of sampling plans for bulk materials, the plans for aflatoxins are also based on compliance of the average level, to ensure that there is a small chance that the average level in a lot exceeds the maximum limit. It is usually assumed that the quality characteristic is normally distributed; the appropriateness of the distribution is less critical when compliance of the average level is being assessed. It is also usually assumed that there is a single specification limit, either a lower specification limit, L or an upper specification limit, U.
[1044]Types of data	[1045]Attributes	[1046]Data for which the test results have nominal outcomes or are measured on a scale, particularly binary outcomes such as pass or fail, and measurements classified as binary outcomes.
[1047]Types of data	[1048]Variables	[1049]Inspection by Variables means that the outcomes of the measurements on each sample is a number, usually a decimal number. This is in contrast to attributes data where pass/fail outcomes are obtained or on a scale (sometimes described numerically, e.g. 1-5).
[1050]Type of sampling plan	[1051]Attributes Plan	[1052]Inspection by Attributes consists of examining an item, or characteristics of an item, and classifying the item as 'conforming' or 'nonconforming'. The action to be taken is decided by counting the number of nonconforming items or the number of nonconformities found in a random sample. An inspection by attributes sampling plan specifies the number of samples (n) and the maximum number of nonconforming items, referred to as the acceptance constant (c), for the lot to be accepted. The values of n and c are worked out from the specified levels of allowable risk.
[1053]Type of sampling plan	[1054]Variables Plan	[1055]Inspection by Variables plans use means and standard deviations calculated from the measurements (variables data) to make a decision about the acceptance of a lot. These plans are specified by the number of samples required to be taken (n) and an acceptability constant (k).
[1056]Measurement uncertainty	[1057]	[1058]Parameter, associated with the result of a measurement, that characterizes the dispersion of the values that could reasonably be attributed to the measurand (i.e. the quantity intended to be measured). Measurement can consist of random and systematic components.
[1059]Lot standard deviation	[1060]	[1061]A parameter, usually expressed as a standard deviation, describing the variation of a characteristic within a lot.
[1062]Negligible measurement uncertainty	[1063]	[1064]The situation where the measurement uncertainty is small in relation to the lot standard deviation and does not need to be taken into account in the design of a sampling plan. Typically, MU is considered negligible if the standard deviation representing the MU is less than 10% of the lot standard deviation.
[1065]Non-negligible	[1066]	[1067]Refers to cases where the measurement uncertainty is NOT negligible.

measurement uncertainty		
[1068]Standard deviation	[1069]	[1070]Standard deviation is a measure of the amount of variation or dispersion in a set of values
[1071]Known (true) standard deviation	[1072]	[1073]Conceptually, the standard deviation that would be found, for example, if every item in a lot was measured. In practice, standard deviations can be considered known if calculated using a reasonably large number of test results, typically 100-200. For a standard deviation representing the longer-term variation of a process to be considered known, the process must be stable (consistent) over time.
[1074]Estimated (sample) standard deviation	[1075]	[1076]A standard deviation calculated from a smaller amount of data than required for the standard deviation to be considered known.
[1077]Normal distribution	[1078]	[1079]A statistical distribution commonly used in many branches of statistics to describe the variation of a measurement method under certain conditions or of a characteristic within a lot. A normal distribution is described by its mean (i.e. average level) and standard deviation and follows a characteristic 'bell-shaped' curve.
[1080]Compositional proportion	[1081]	[1082]A characteristic whose concentration within a lot can be expressed as a 'mass fraction', a number taking values between zero and one. Strictly speaking compositional proportions are dimensionless, and do not have proper units of measure, although it is common to express them using units such as percentages, parts-per-million (ppm) etc.
[1083]Producer's risk	[1084]PR	[1085]In general terms, producer's risk is the risk that a lot of good quality will be rejected. More specifically, in the design of acceptance sampling plans, producer's risk is the probability of rejecting a lot that has a quality level equal to the producer's risk quality (PRQ) level.
[1086]Producer's risk quality level	[1087]PRQ	[1088]The quality level (percentage nonconforming in the lot) at which the probability of rejecting the lot is equal to the specified producer's risk (PR)
[1089]Consumer's risk	[1090]CR	[1091]Consumer's risk is the risk that a lot of poor quality will be accepted. More specifically, in the design of acceptance sampling plans, consumer's risk is the probability of accepting a lot that has a quality level equal to the consumer's risk quality (CRQ) level.
[1092]Consumer's risk quality level	[1093]CRQ	[1094]The quality level (percentage nonconforming in the lot) at which the probability of accepting the lot is equal to the specified consumer's risk (CR)

[1095]

[1096]

[1097]APPENDIX II**[1098]ISO INSPECTION PLANS INDEXED BY PRODUCER'S RISK****1 [1099]ISO Inspection plans indexed by producer's risk – Introduction/Background**

[1100]As noted in sections 4.2.3 and 4.3.4, the sampling plans included in the ISO 2859 and ISO 3951 standards differ from plans discussed elsewhere in these guidelines in that they have been designed to explicitly control either the producer's or the consumer's risk, but not both, and use a lot size relationship to determine the required sample size.

1.1 [1101]Lot Size vs Sample Size

[1102]Statistically, the lot size does not have an important role in determining protection to consumers and producers whereas changes in the sample size does affect the protection afforded by any plan.

[1103]However, despite this, a lot size versus sample size relationship has been built into the design of the sampling plans appearing in the ISO standards. This relationship is arbitrary, although it has the general effect of reducing the risks of making incorrect decisions for larger lots, where the costs incurred from incorrect decisions will be greater. This relationship means that the ISO standards are applicable only to lots that consist of discrete items.

[1104]As a consequence of employing the sample size versus lot size relationship, ISO has designated that sampling plans indexed by PRQ, explicitly controlling the producer's risk, are intended for the inspection of a continuing series of lots and plans indexed by CRQ, explicitly controlling consumer's risk, as being suitable for the inspection of isolated lots. However, this distinction is no longer relevant if both types of risk are considered in the design of plans.

1.2 [1105]Sampling Schemes

[1106]The ISO standards indexed by PRQ employ sampling schemes, sets of sampling plans with different levels of inspection to ensure quality is effectively controlled. Sampling schemes employ switching rules for changing between inspection levels based on recent quality history. Typically, and in ISO standards, switching occurs between normal, tightened, and reduced inspection plans within each sampling scheme:

- [1107]normal inspection is used when the process is considered to be operating at, or slightly better than, the PRQ
- [1108]tightened inspection uses stricter decision rules than those used in normal inspection. The main objective of using tightened inspection is to exert pressure on the producer when the quality is poorer than the PRQ by introducing a higher rate of rejection
- [1109]reduced inspection permits smaller sample sizes than those used in normal inspection. When the level of the submitted quality is sufficiently good, reduced inspection offers sampling economy.

[1110]Sampling schemes provide more comprehensive assurance than the use of individual sampling plans. However, switching rules are considered too complex to apply in international trade, and from a consumer's point of view in general, although it is possible to design a sampling plan that controls the producer's and consumer's risks to the same levels as an overall sampling scheme.

1.3 [1111]Table: Inspection by Attributes Plans from ISO 2859-1

[1112]Lot size (Number of items)	[1113]AQL	[1114]Reduce d [1115](n, c)	[1116]Normal [1117](n, c)	[1118]Tightened [1119](reduced inspection) [1120](n, c)
[1121]2-8	[1122]0.65 %	[1123](2 ,0)	[1124](2 ,0)	[1125](3 ,0)
[1126]	[1127]2.50 %	[1128](2 ,0)	[1129](2 ,0)	[1130](3 ,0)
[1131]	[1132]6.50 %	[1133](2 ,0)	[1134](2 ,0)	[1135](3 ,0)
[1136]	[1137]	[1138]	[1139]	[1140]
[1141]9-15	[1142]0.65 %	[1143](2 ,0)	[1144](3 ,0)	[1145](5 ,0)
[1146]	[1147]2.50 %	[1148](2 ,0)	[1149](3 ,0)	[1150](5 ,0)
[1151]	[1152]6.50 %	[1153](2 ,0)	[1154](3 ,0)	[1155](5 ,1)

[1112]Lot size (Number of items)	[1113]AQL	[1114]Reduce d [1115](n, c)	[1116]Normal [1117](n, c)	[1118]Tightened [1119](reduced inspection) [1120](n, c)
[1156]	[1157]	[1158]	[1159]	[1160]
[1161]16-25	[1162]0.65 %	[1163](2 ,0)	[1164](5 ,0)	[1165](8 ,0)
[1166]	[1167]2.50 %	[1168](2 ,0)	[1169](5 ,0)	[1170](8 ,0)
[1171]	[1172]6.50 %	[1173](2 ,0)	[1174](5 ,1)	[1175](8 ,1)
[1176]	[1177]	[1178]	[1179]	[1180]
[1181]26-50	[1182]0.65 %	[1183](2 ,0)	[1184](8 ,0)	[1185](13 ,0)
[1186]	[1187]2.50 %	[1188](2 ,0)	[1189](8 ,0)	[1190](13 ,1)
[1191]	[1192]6.50 %	[1193](2 ,0)	[1194](8 ,1)	[1195](13 ,1)
[1196]	[1197]	[1198]	[1199]	[1200]
[1201]51 - 90	[1202]0.65 %	[1203](2 ,0)	[1204](13 ,0)	[1205](20 ,0)
[1206]	[1207]2.50 %	[1208](2 ,0)	[1209](13 ,1)	[1210](20 ,1)
[1211]	[1212]6.50 %	[1213](2 ,0)	[1214](13 ,2)	[1215](20 ,2)
[1216]	[1217]	[1218]	[1219]	[1220]
[1221]91 - 150	[1222]0.65 %	[1223](3 ,0)	[1224](20 ,0)	[1225](32 ,0)
[1226]	[1227]2.50 %	[1228](3 ,0)	[1229](20 ,1)	[1230](32 ,1)
[1231]	[1232]6.50 %	[1233](3 ,0)	[1234](20 ,3)	[1235](32 ,3)
[1236]	[1237]	[1238]	[1239]	[1240]
[1241]151 - 280	[1242]0.65 %	[1243](5 ,0)	[1244](32 ,0)	[1245](50 ,1)
[1246]	[1247]2.50 %	[1248](5 ,0)	[1249](32 ,2)	[1250](50 ,2)
[1251]	[1252]6.50 %	[1253](5 ,1)	[1254](32 ,5)	[1255](50 ,5)
[1256]	[1257]	[1258]	[1259]	[1260]
[1261]281 - 500	[1262]0.65 %	[1263](8 ,0)	[1264](50 ,1)	[1265](80 ,1)
[1266]	[1267]2.50 %	[1268](8 ,0)	[1269](50 ,3)	[1270](80 ,3)
[1271]	[1272]6.50 %	[1273](8 ,1)	[1274](50 ,7)	[1275](80 ,8)
[1276]	[1277]	[1278]	[1279]	[1280]
[1281]501 - 1 200	[1282]0.65 %	[1283](13 ,0)	[1284](80 ,1)	[1285](125 ,1)
[1286]	[1287]2.50 %	[1288](13 ,1)	[1289](80 ,5)	[1290](125 ,5)
[1291]	[1292]6.50 %	[1293](13 ,2)	[1294](80 ,10)	[1295](125 ,12)
[1296]	[1297]	[1298]	[1299]	[1300]
[1301]1 201 – 1 320	[1302]0.65 %	[1303](20 ,1)	[1304](125 ,2)	[1305](200 ,2)
[1306]	[1307]2.50 %	[1308](20 ,1)	[1309](125 ,7)	[1310](200 ,8)

[1112]Lot size (Number of items)	[1113]AQL	[1114]Reduce d [1115](n, c)	[1116]Normal [1117](n, c)	[1118]Tightened [1119](reduced inspection) [1120](n, c)
[1311]	[1312]6.50 %	[1313](20 ,3)	[1314](125 ,14)	[1315](200 ,18)
[1316]1 321 – 10 000	[1317]0.65 %	[1318](32 ,0)	[1319](200 ,3)	[1320](315 ,3)
[1321]	[1322]2.50 %	[1323](32 ,2)	[1324](200 ,10)	[1325](315 ,12)
[1326]	[1327]6.50 %	[1328](32 ,5)	[1329](200 ,21)	[1330](315 ,18)
[1331]	[1332]	[1333]	[1334]	[1335]
[1336]10 001 – 35 000	[1337]0.65 %	[1338](50 ,1)	[1339](315 ,5)	[1340](500 ,5)
[1341]	[1342]2.50 %	[1343](50 ,3)	[1344](315 ,14)	[1345](500 ,18)
[1346]	[1347]6.50 %	[1348](50 ,7)	[1349](315 ,21)	[1350](500 ,18)
[1351]	[1352]	[1353]	[1354]	[1355]
[1356]35 001 - 150 000	[1357]0.65 %	[1358](80 ,1)	[1359](500 ,7)	[1360](800 ,8)
[1361]	[1362]2.50 %	[1363](80 ,5)	[1364](500 ,21)	[1365](800 ,18)
[1366]	[1367]6.50 %	[1368](80 ,10)	[1369](500 ,21)	[1370](800 ,18)
[1371]	[1372]	[1373]	[1374]	[1375]
[1376]150 001 -	[1377]0.65 %	[1378](125 ,2)	[1379](800 ,10)	[1380](1 250 ,12)
[1381]500 000	[1382]2.50 %	[1383](125 ,7)	[1384](800 ,21)	[1385](1 250 ,18)
[1386]	[1387]6.50 %	[1388](125 ,12)	[1389](800 ,21)	[1390](1 250 ,18)
[1391]	[1392]	[1393]	[1394]	[1395]
[1396]500 001 and over	[1397]0.65 %	[1398](200 ,3)	[1399](1 250 ,14)	[1400](2 000 ,18)
[1401]	[1402]2.50 %	[1403](200 ,10)	[1404](1 250 ,21)	[1405](2 000 ,18)
[1406]	[1407]6.50 %	[1408](200 ,12)	[1409](1 250 ,21)	[1410](2 000 ,18)

[1411]

1.4 [1412]Table: Inspection by Variables Plans from ISO 3951-1 (lot standard deviation unknown)

[1413]Lot size (Number of items)	[1414]AQL	[1415]Reduced (n, k)	[1416]Normal (n, k)	[1417]Tightened inspection (n, k)
[1418]2 - 8	[1419]0.65%	[1420](3, 1.45)	[1421](3, 1.45)	[1422](4, 1.45)
[1423]	[1424]2.50%	[1425](3, 0.958)	[1426](3, 0.958)	[1427](4, 0.958)
[1428]	[1429]6.50%	[1430](3, 0.566)	[1431](3, 0.566)	[1432](4, 0.566)
[1433]	[1434]	[1435]	[1436]	[1437]
[1438]9 - 15	[1439]0.65%	[1440](3, 1.45)	[1441](3, 1.45)	[1442](5, 1.45)
[1443]	[1444]2.50%	[1445](3, 0.958)	[1446](3, 0.958)	[1447](5, 0.958)
[1448]	[1449]6.50%	[1450](3, 0.566)	[1451](3, 0.566)	[1452](5, 0.566)
[1453]	[1454]	[1455]	[1456]	[1457]
[1458]16 - 25	[1459]0.65%	[1460](3, 1.45)	[1461](4, 1.45)	[1462](7, 1.45)
[1463]	[1464]2.50%	[1465](3, 0.958)	[1466](4, 0.958)	[1467](7, 0.958)
[1468]	[1469]6.50%	[1470](3, 0.566)	[1471](4, 0.566)	[1472](7, 0.566)
[1473]	[1474]	[1475]	[1476]	[1477]
[1478]26 - 50	[1479]0.65%	[1480](3, 1.45)	[1481](5, 1.45)	[1482](10, 1.45)
[1483]	[1484]2.50%	[1485](3, 0.958)	[1486](5, 0.958)	[1487](10, 0.958)
[1488]	[1489]6.50%	[1490](3, 0.566)	[1491](5, 0.566)	[1492](10, 0.566)
[1493]	[1494]	[1495]	[1496]	[1497]
[1498]51 - 90	[1499]0.65%	[1500](3, 1.45)	[1501](7, 1.45)	[1502](15, 1.45)
[1503]	[1504]2.50%	[1505](3, 0.958)	[1506](7, 0.958)	[1507](15, 0.958)
[1508]	[1509]6.50%	[1510](3, 0.566)	[1511](7, 0.566)	[1512](15, 0.566)
[1513]	[1514]	[1515]	[1516]	[1517]
[1518]91 - 150	[1519]0.65%	[1520](3, 1.45)	[1521](10, 1.45)	[1522](20, 1.45)
[1523]	[1524]2.50%	[1525](3, 0.958)	[1526](10, 0.958)	[1527](20, 0.958)
[1528]	[1529]6.50%	[1530](3, 0.566)	[1531](10, 0.566)	[1532](20, 0.566)
[1533]	[1534]	[1535]	[1536]	[1537]
[1538]151 - 280	[1539]0.65%	[1540](4, 1.45)	[1541](15, 1.45)	[1542](25, 1.45)
[1543]	[1544]2.50%	[1545](4, 1.01)	[1546](15, 1.01)	[1547](25, 1.01)
[1548]	[1549]6.50%	[1550](4, 0.617)	[1551](15, 0.617)	[1552](25, 0.617)
[1553]	[1554]	[1555]	[1556]	[1557]
[1558]281 - 500	[1559]0.65%	[1560](5, 1.53)	[1561](20, 1.53)	[1562](35, 1.53)
[1563]	[1564]2.50%	[1565](5, 1.07)	[1566](20, 1.07)	[1567](35, 1.07)
[1568]	[1569]6.50%	[1570](5, 0.675)	[1571](20, 0.675)	[1572](35, 0.675)
[1573]	[1574]	[1575]	[1576]	[1577]
[1578]501 - 1 200	[1579]0.65%	[1580](7, 1.62)	[1581](35, 1.62)	[1582](50, 1.62)
[1583]	[1584]2.50%	[1585](7, 1.15)	[1586](35, 1.15)	[1587](50, 1.15)
[1588]	[1589]6.50%	[1590](7, 0.755)	[1591](35, 0.755)	[1592](50, 0.755)
[1593]	[1594]	[1595]	[1596]	[1597]
[1598]1 201 - 1 320	[1599]0.65%	[1600](10, 1.72)	[1601](50, 1.72)	[1602](75, 1.72)
[1603]	[1604]2.50%	[1605](10, 1.23)	[1606](50, 1.23)	[1607](75, 1.23)
[1608]	[1609]6.50%	[1610](10, 0.828)	[1611](50, 0.828)	[1612](75, 0.828)
[1613]	[1614]	[1615]	[1616]	[1617]
[1618]1 321 - 10 000	[1619]0.65%	[1620](15, 1.79)	[1621](75, 1.79)	[1622](100, 1.79)
[1623]	[1624]2.50%	[1625](15, 1.30)	[1626](75, 1.30)	[1627](100, 1.30)
[1628]	[1629]6.50%	[1630](15, 0.886)	[1631](75, 0.886)	[1632](100, 0.886)

[1413]Lot size (Number of items)	[1414]AQL	[1415]Reduced (n, k)	[1416]Normal (n, k)	[1417]Tightened inspection (n, k)
[1633]	[1634]	[1635]	[1636]	[1637]
[1638]10 001 - 35 000	[1639]0.65%	[1640](20, 1.82)	[1641](100, 1.82)	[1642](150, 1.82)
[1643]	[1644]2.50%	[1645](20, 1.33)	[1646](100, 1.33)	[1647](150, 1.33)
[1648]	[1649]6.50%	[1650](20, 0.917)	[1651](100, 0.917)	[1652](150, 0.917)
[1653]	[1654]	[1655]	[1656]	[1657]
[1658]35 001 - 150 000	[1659]0.65%	[1660](25, 185)	[1661](150, 185)	[1662](200, 185)
[1663]	[1664]2.50%	[1665](25, 135)	[1666](150, 135)	[1667](200, 135)
[1668]	[1669]6.50%	[1670](25, 936)	[1671](150, 936)	[1672](200, 936)
[1673]	[1674]	[1675]	[1676]	[1677]
[1678]150 001 - [1679]500 000	[1680]0.65%	[1681](35, 189)	[1682](200, 189)	[1683](200, 189)
[1684]	[1685]2.50%	[1686](35, 139)	[1687](200, 139)	[1688](200, 139)
[1689]	[1690]6.50%	[1691](35, 969)	[1692](200, 969)	[1693](200, 969)
[1694]	[1695]	[1696]	[1697]	[1698]
[1699]500 001 -	[1700]0.65%	[1701](50, 193)	[1702](200, 193)	[1703](200, 193)
[1704]	[1705]2.50%	[1706](50, 142)	[1707](200, 142)	[1708](200, 142)
[1709]	[1710]6.50%	[1711](50, 100)	[1712](200, 100)	[1713](200, 100)

GENERAL COMMENTS

Para	COMMENT	MEMBER / OBSERVER	NZ comment
G	<p>The Philippines agrees on the proposed draft information document prepared by Germany on the GUIDELINES ON MEASUREMENT UNCERTAINTY (CXG 54-2004) and agrees to publish on the Codex website.</p> <p>Rationale: The Information document was updated to take into account the comments received during CCMAS41. This document provides the information on how different approaches for the evaluation of measurement uncertainty relate to one another and have information regarding the best procedure to adopt in any given case. Furthermore, this new document provides information and clarifies basic understandings which are important for the correct evaluation and interpretation of measurement uncertainty. We also agree on the new note added at the end of Section 3 regarding the case that precision depends on concentration.</p>	Philippines	Refers CXG 54 Not applicable to CXG50. Sent to Germany
G	<p>Ecuador agradece al grupo de trabajo la revisión del documento CX 50 (apéndice I). Ecuador está de acuerdo con los cambios realizados al documento, el cual se encuentra mejor estructurado, y apoya que se continúe con el grupo de trabajo para el desarrollo del documento de información.</p> <p>Ecuador thanks the working group for the review of document CX 50 (Appendix I). Ecuador agrees with the changes made to the document, which is better structured, and supports continuing with the working group for the development of the information document.</p>	Ecuador	Noted. Thank you.
G	<p>Brazil appreciates the excellent work made by New Zealand and Germany to provide a comprehensive and complex document on sampling and thanks for the opportunity to present the following comments.</p> <p>Regarding the structure of the document, we suggest organizing it into chapters according to the nature and rationale behind each of the sampling plan and in line with the examples described in the information document, to facilitate the reading and understanding of the content. The scope of each sampling plan should be clear as to the applicable situations.</p> <p>Furthermore, we have noticed that questions raised by the EWG in 2019 are not completely</p>	Brazil	We consider that the Guidelines already follow the suggested structure; Section 4.2 deals with Attribute Plans with several subsections devoted to different types of those plans, Section 4.3 deals with variables plans (where the MU is negligible) and Section 5.2 with variables plans, with subsections sections dealing with the cases where the laboratory bias is negligible or non-negligible

	<p>answered in an objective and practical way in the revised guidelines. These questions are described in the presentation to CCMAS40 (https://www.fao.org/fao-who-codexalimentarius/sh-proxy/pt/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-715-40%252FSIDE%20EVENT%252FCCMAS40_GL50.pdf) and copied below: “The EWG comments over both documents did raise some important questions and these were covered in the CL2019/17-MAS - In what context is it that Codex sampling plans are intended to be used? - What do Codex sampling plans hope to achieve? - How Codex sampling plans can be used by exporting and importing countries in real situations? - Are Codex sampling plans intended for use in international trade disputes? - What situations where Codex sampling plans are used, are covered or not covered?”</p> <p>Considering these points raised and the specific comments provided, Brazil is of the opinion that the document is not ready for adoption in step 8.</p>		<p>The introduction explains the context of sampling plans in Codex, while we have harmonised limits and harmonised reference methods, very few standards specify sampling plans for assessing compliance to those limits. Some of the sampling plans that do exist may not be satisfactory in controlling risks. Harmonisation of sampling plans is highly desirable to ensure plans for provisions in Codex standards are fit for purpose. These plans are intended for routine use but may also be used for disputes.</p> <p>These guidelines are not comprehensive, plans for other sources can be used subject to their endorsement by Codex. In addition, the methodology in CXG50 may not be necessarily applicable for areas such as food safety where, e.g. CCFH, has developed their own plans.</p>
G	<p>The European Union and its Member States (EUMS) congratulate the EWG under the lead of New Zealand and co-chaired by Germany for the further development of the revision of CXG50-2004. Sampling is an essential element for the verification of provisions in Codex standards and the revision of CXG50 with the overall aim to simplify its structure and language to provide effective guidance to all CAC subsidiary bodies and interested parties for designing/selecting sampling plans, is highly welcome. The EUMS are of the opinion that the presented draft addresses in a comprehensive manner the written comments to CL 2021/10/OCS-MAS and those made during the discussion of CCMAS41, in particular the terminology related to measurement error/measurement uncertainty, which has been aligned with JCGM, ISO and EURACHEM texts. The issues around the difference between acceptance sampling and conformity assessment were also addressed and clarified.</p> <p>Chapters 1-4 of the ‘Reference Guidelines’ provide an easy-to-read background to acceptance sampling, which will certainly be helpful for Commodity Committees to select and design relevant sampling plans for CXSs within their scope. Chapter 5 is - perhaps by the nature of the subject - quite complex. As it deals primarily with the application of acceptance sampling in certain exceptional situations, it could be moved to the e-book, where more explanations could be given and illustrated through suitable examples.</p>	<p>European Union</p>	<p>We agree Section 5 is long, but we must retain some of the information in the reference document itself. NZ/Germany have reviewed and updated this section.</p> <p>We propose to expand Appendix II by including tables of the ISO CR plans. Noting that the ISO plans address either the PR or the CR but not both (raising possible issues of fairness considering the scope of application of CXG 50) and the plans in the tables do not cater for non-negligible MU.</p> <p>it is not feasible to publish tables of sampling plans when the analytical measurement uncertainty is non-negligible as the tables would be voluminous to allow for every combination of the measurement and sampling uncertainties.</p> <p>However, considering CXG50 is a reference document and the scope</p>

<p>Appendix I guides users through the work flow for the selection of sampling plans appropriate for the most common use cases of Codex Commodity Committees. The provided examples highlight the high number of samples that need to be tested if PRQ and CRQ are maintained at low levels of nonconforming items. Even if user will have the opportunity to ‘experiment’ with the ShinyApps in the e-book to find solutions requiring a lower number of samples, certain ‘prefabricated’ plans from the ISO standards should be offered for the orientation of less experienced users (e.g., by referring to the ISO plans in Annex II).</p> <p>The EUMS are aware that the proposed CGX50 text follows a different approach and style compared to the current version, which was the intent of the re-draft. Information provided as tables and figures in the current CGX50 will be moved to an e-book and will be provided in form of software apps, which is an appropriate and smart way of helping users to understand the impact of certain plans. Notwithstanding the idea of going digital, the EUMS welcome Annex II, which contains ISO plans in tabular form, but question why only plans indexed by PRQ (AQL) are included, since sampling inspection of isolated lots represent the majority of applications in the Codex context, particularly, as sampling plans indexed by CRQ (LQ) are relevant for food safety related characteristics.</p> <p>The EUMS again stresses the need for validating, debugging and beta-testing of the (Shiny)apps to ensure proper functioning of the system. Moreover, access and maintenance of the software have to be addressed as well.</p> <p>The EUMS invites the Committee to explain the relationship of the re-drafted CXG 50 and the existing Information Document ‘Practical Examples of Sampling Plans’ as well as sampling plans of existing Standards, e.g. those of CXS 193.</p>	<p>primarily focuses on composition and commodity defects, we plan to also include plans that allow control of both the PR and CR in the information document.</p> <p>The information document will be published as an e-book that includes the apps. It will be finalised in the coming year, following final agreement on the content of the CXG 50 guidelines.</p> <ul style="list-style-type: none"> • NZ will discuss the issue of checking the apps with the co-chair Germany • Some cross-checking of the simpler apps has been done to ensure that the outputs are the same as that produced by other packages such as Minitab and also in Excel, where such comparisons can be made. • All the statistical techniques mentioned in CXG 50 have been taken from papers published in peer reviewed statistical journals, ISO or other Standards, or in some cases from statistics textbooks. The list of references in the e-book will be updated. • There is no new, previously unpublished material in CXG 50 • In the development of CXG 50, NZ has been guided by a statistical expert in sampling and we have also received considerable support from the German statisticians. • The ‘Practical Examples’ information document was based on the ISO plans where MU was negligible. Plans in CX193 are examples of plans for bulk materials; only limited information on these plans is provided in CXG50 due to their complexity.
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1	Agree with no comments.	Iraq	Noted. Thank you.
1	NMI would like to thank New Zealand and Germany for their continued efforts and development of the Revised General Guidelines on Sampling (CXG 50-2004) including Appendix I (Guide to the Selection and Design of Sampling plans) and Appendix II (ISO Inspection Plans) (at Step 6).	Australia	Noted. Thank you.

SPECIFIC COMMENTS

Revised General Guidelines on Sampling (CXG 50-2004) including Appendix I (Guide to the Selection and Design of Sampling plans) and Appendix II (ISO Inspection Plans)			
3	<p>1. Compared to the 'Revised General Guidelines on Sampling (CXG 50-2004): Part II – Reference Document' distributed to the EWG June 2022, the 'Revised General Guidelines on Sampling (CXG 50-2004) including Appendix I (Guide to the Selection and Design of Sampling plans) and Appendix II (ISO Inspection Plans) (at Step 6)' has undergone some substantial and key revisions.</p> <p>2. We particularly support the inclusion of a discussion on ISO Sampling Plans; the distinction of Acceptance Sampling versus Conformity Assessment; the distinction between analytical measurement uncertainty and the sampling component of (the total) measurement uncertainty; and linkage of the 'Reinspection' with the 'The Guidelines for Settling Disputes on Analytical (Test) Results (CXG 70-2009)', plus removal of information on 'retesting'.</p> <p>3. We thus believe this latest revised CXG 50 could advance to Step 8.</p>	Australia	Noted. Thank you.
3	<p>Egypt agrees on the proposed draft & recommends the following notes:</p> <ul style="list-style-type: none"> Referring to examples of isolated lots, and a series of continues lots, as mentioned in the old version of CXG 50 - 2004 , as the aforementioned examples were deleted when reviewing the project, in order to facilitate the implementation . Review table numbers mentioned in the project. Providing the project with the item on the decision-making tree, as stated in the old version of the specification. 	Egypt	<p>The old version of CXG50 was based on the ISO plans that, as explained, are not the most general as they do not allow explicit control of both producer's and consumer's risks.</p> <p>The distinction between plans for a continuing series of lots and those for isolated lots is an outcome of the way the ISO plans have been designed; this distinction does nto apply to the methodology proesented in CXG50 where both PR and CR are specified int eh design.</p> <p>Appendix 1 is intended to simplify the decision making 'tool' (tree) in 2.5.1.4 in the old version for the selection of sampling plans</p>

4	Uganda supports the reestablishment of the EWG to complete the development of the information document (e-book and with sampling plans applications).	Uganda	Noted. Thank you.
10	<p>Sampling therefore plays an important role in achieving the Codex objectives of protecting consumers' health and ensuring fair practices in the food trade. Codex sampling plans also have an important role in avoiding or removing difficulties which may be created by diverging legal, administrative, and harmonizing technical approaches to sampling and by diverging interpretation of results of analysis interpretation in relation to lots or consignments of foods, in the light of the relevant provision(s) of the applicable Codex standard.</p> <p>We suggest redrafting the fourth paragraph as following:</p> <p>"Sampling therefore plays an important role in achieving the Codex objectives of protecting consumers' health and ensuring fair practices in the food trade. Codex sampling plans also have an important role in harmonizing technical approaches to sampling and by results of analysis interpretation in relation to lots or consignments of foods, in the light of the relevant provision(s) of the applicable Codex standard."</p>	Brazil	Agreed.
11	It is important that sampling is-be undertaken in a way that contributes to these objectives.	Mauritius	Agree.
12	Specification of these quality objectives, the quality level acceptable to the customer and the rate of acceptance of compliant products, enable-enables the development of sampling plans.	Mauritius	Agree.
16	<p>In these Guidelines, the focus is on acceptance sampling plans for the inspection of isolated homogeneous lots, in which the risks to consumers and producers are controlled. Additionally, there are some guidelines for sampling inhomogeneous lots.</p> <p>In the first paragraph of the scope, we suggest including a sentence as read below.</p> <p>"In these Guidelines, the focus is on acceptance sampling plans for the inspection of isolated homogeneous lots, in which the risks to consumers and producers are controlled. Additionally, there are some guidelines for sampling inhomogeneous lots."</p> <p>We also suggest moving the last paragraphs of the scope, from "the following situations are covered by these guidelines" to the "note", which list the situations covered by the guidelines, to the introduction section. Another option would be including these situations in a table of contents.</p>	Brazil	NZ considers that the current structure could be retained as the purpose of the scope is to describe what is covered or not covered in the document

24	<p>In section 2, general concepts which are relevant for the sampling of foods are defined, sections 3, 4 and 5 cover acceptance sampling plans for different situations of statistical food control. Section 6 covers other matters such as physical sampling, reinspection, and inhomogeneous lots.</p> <p>Japan proposes to delete “reinspection”. Reinspection is not a part of sampling or statistical consideration, but may be necessary when parties involving import and export enter dispute over the analytical results. Thus, it is important to avoid duplication of work and inconsistency with other Codex texts, especially CXG70.</p>	Japan	<p>NZ considers that this section could be retained. CXG70 covers only disputes arising from the disagreement of test results using arbitration by a third laboratory. There are other possible causes of disputes as mentioned in the footnote on p1 of CXG70 for which CXG70 is not appropriate: It is recognized that disputes may arise from other cause(s), which should also be investigated... Possible reasons for disagreement may include one or several causes such as:</p> <ul style="list-style-type: none"> - The existence, appropriateness and statistical validity of the sampling plan used to assess the product; - the allowances made for normal measurement error and within-lot product variation; - differences in physical sampling procedures; - differences in composition of the samples tested due to product inhomogeneity - changes occurring during storage and/or transport of the product. <p>Reinspection can be used for these other cases, but could also be used for disputes relating to the disagreement of results.</p> <p>Reference to comments re para 24.</p>
29	<p>Definitions</p> <p>We note that the document contains definitions for terms throughout the text and not just in section 1.3. In this regard, we suggest including all definitions in a single section and aligning them with existing definitions in other Codex documents, to avoid inconsistencies and contradictions. Otherwise, it would be necessary to perform an extensive review in the Codex Standards. For example, in Annex 1 of CXS 193-1995 - General Standard for Contaminants and Toxins in Food and Feed, there is a table with definitions for laboratory sample and test portion which differs from the definitions included in table 3 (Bulk material terminology for sampling plans) of the revised General Guidelines on Sampling.</p>	Brazil	<p>We didn't want to create confusion by including the specific definitions relating to bulk materials in 1.3.</p> <p>In Section 4.4.3 we note that the terminology relating to sampling of bulk materials varies widely among authors and subject areas (e.g. minerals versus grains) and gives those definitions as an example.</p>

	<p>The FAO Mycotoxin Sampling Tool User Guide also mention buyer's and the seller's risks with the same meaning of exporter's risk and importer's risk mentioned in CXS 193-1995. We suggest using the terms that better reflect the intention and avoid defining consumer and producer.</p> <p>There are many terms used that were not defined and should be align throughout text, such as acceptance criterion, decision criteria and decision rule.</p> <p>Brazil prefers keeping, as extend as possible, the definitions already used and understood in the Codex world or mention them in the definition section all the correspondences.</p>		<p>There is no single standard defining terms used in sampling in Codex. CXG 50 definitions will be the definitive guide for sampling under this standard.</p> <p>Where possible, we have used definitions from ISO standards, noting that in many cases the terminology used in Codex and ISO may vary for the same term. However, there can be different definitions for the same term. The definitions in CXG 50 are the ones most relevant for CXG 50</p> <p>The terms producer and consumer are conventional in sampling inspection and we are reluctant to move away from them. However the terms buyer's and seller's risks might be useful to enhance understanding - we will review. Acceptance criterion is defined in section 1.3 – it was agreed that this term should be used instead of decision rule.</p>
29	<p>Definitions</p> <p>“Sampling plan”, “sampling procedure” and “sampling methods” have already used in other Codex documents and important terms in relation to sampling. For consistency with other Codex texts, it is important to make sure their definitions should be consistent with those in other Codex and/or relevant international technical documents (e.g. ISO) to avoid unnecessary confusion to readers</p>	Japan .	<p>The definitions used in CXG 50 are taken from ISO, particularly ISO 3534 Statistics, Vocabulary & Symbols.</p> <p>There is no single standard defining terms used in sampling in Codex. CXG 50 definitions will be the definitive guide for sampling under this standard.</p>
2 Acceptance Sampling – General Principles			
80	<p>Acceptance sampling procedures are used when goods are transferred between two parties. The purpose of these procedures is to provide unambiguous rules for releasing a product after inspection of only a limited sample. Both parties should be fully aware of the limitations and risks associated with</p>	Japan	<p>NZ considers that the current text could be retained.</p>

	<p>using such procedures and therefore most acceptance sampling procedures should include provisions for dealing with disputes and non-conforming items found in lots that have been accepted by the sampling plan.</p> <p>“Sampling” in this text conflicts with “sampling” defined in Section 2. In addition, since Codex has already developed guidelines related to trade dispute caused by analytical results (CXG 70), it is not necessary to refer to “trade dispute” in this guideline, considering trade dispute related to analytical value may be caused not only by sampling procedure but also by other factors. We propose to delete texts after “and therefore most...”.</p>		<p>The term “Acceptance sampling”, is already defined in 1.3. This paragraph is a direct quotation from Holst et al – it says that any agreement on sampling plans should also include provisions on the resolution of disputes; this text is not suggesting how disputes relating to analytical differences or other causes should be resolved.</p> <p>CXG70 covers only disputes arising from the disagreement of test results using arbitration by a third laboratory. There are other possible causes of disputes as mentioned in the footnote on p1 of CXG70 for which CXG70 is not appropriate. Reinspection can be used for these other cases, but could also be used for disputes relating to the disagreement of results.</p> <p>Not all disputes are due to analytical differences; CXG 50 includes re-inspection as it is appropriate for acceptance sampling where the dispute is not due to analytical differences.</p>
81	<p>An acceptance sampling plan specifies the number of samples to be taken and how they are to be taken, the procedure used to test or examine those samples, and the acceptance criterion, based on the results from the testing of those samples, used to decide whether a lot should be accepted.</p> <p>In this text, methods of analysis should be selected based on sampling plans, which is not the current practice of endorsement in CCMAS. To change the procedure, discussion at the CCMAS plenary is necessary. Japan would like to flag up the point to other delegations.</p>	Japan	<ol style="list-style-type: none"> 1. The text says that the complete specification of the acceptance sampling plan should include how the samples are tested. 2. Section 5 talks about how the sampling plan is adjusted to allow for the MU inherent in the test method.
98	<p>Approach (c) is not recommended. It may be used for practical reasons, such as limited resources, or for simplicity. However, such plans might not provide the expected level of assurance of food quality and may inadvertently impose high costs, for instance through unwarranted acceptance of food that could lead to illness or unjustified rejection that, in turn, could lead to the imposition of fines, penalties or trade sanctions. The risks associated with such plans should be evaluated where possible. Decisions</p>	Japan	<p>NZ considers that the current text could be retained, it is a direct quote from ISO2859-10 that discusses the advantages and disadvantages of various options for the design of sampling plans.</p>

	<p>on acceptance or rejection should not be made solely based on these plans except by mutual agreement of the consumer and producer with an understanding of the risks involved.</p> <p>These guidelines are to be established to help governments and commodity committees elaborating feasible, suitable sampling plan. As it is necessary under a certain situation to accomplish the Codex's objectives, "not recommend" an option is not suitable. Propose to delete "is not recommended. It"</p>		
100	<p>Acceptance sampling versus conformity assessment Section number (2.2.1) should be included for easier reference</p>	Japan	Agree. Amended Apologies, section 2.2.1 was a late addition to the guidelines and we should have included a definition.
101	<p>Acceptance sampling and conformity assessment do not have the same purpose. Conformity assessment is the use of a single measurement result to decide whether a single item conforms to a limit. Acceptance sampling is the process in which a sample² is taken from a lot and involves the determination of acceptance criteria and sample size to decide whether a lot is accepted or rejected.</p> <p>"Conformity assessment" is not defined in the definition section. For better understanding by readers, the definition should be included in the definition section, so that users can understand the content better.</p>	Japan	Agree. Definition for Conformity Assessment to be included.
105	<p>Conformity assessment</p> <p>The document should make it clear when uncertainty should apply and whether it will apply in choosing the plan or affect the decision rule. We also note that the information document mentions sample preparation, sampling and analytical variance, however, variance is not addressed in the guidelines, i.e., how it will be applied to design a sampling plan.</p>	Brazil	<p>Sections 3.2.7 and 5.2 say that allowance might need to be made when the analytical uncertainty exceeds 10% of the lot standard deviation.</p> <p>The text relates to the design of plans for bulk materials, specifically in this case to the plans in CXS193. The design of these plans is statistically complex and only an overview is presented in section 4.4.</p>
105	<p>Conformity assessment Propose to add section number (2.2.2)</p>	Japan	NZ considers that the current structure could be retained, this paragraph is part of the discussion in 2.2.1.
106	<p>In conformity assessment, conformity is assessed via the application of a decision rule which accounts for measurement uncertainty. <u>Depending on the measurand, the measurement Measurement uncertainty may or may not include uncertainty from sampling; however, total MU, including uncertainty from sampling, would be of important.</u> Depending on the decision rule, there may be cases where the assessment is inconclusive.</p>	Japan	<p>CXG54 considers only the analytical component of MU. Depending on the measurand, measurement uncertainty may or may not include uncertainty from sampling.</p>

	<p>This text conflicts with the definition of Measurement Uncertainty in CXG-54, in which measurement uncertainty does not include uncertainty from sampling.</p> <p>The text should read as follows: Measurement uncertainty do not include uncertainty from sampling; however, total MU, including uncertainty from sampling, would be of important.</p>		<p>For example, if we are considering conformity of the true value of a sample, MU will not include the sampling component whereas if we are looking at conformity of the mean value of a lot for example, the sampling component would be included.</p>
107	<p>Acceptance sampling</p> <p>Section number 2.2.3 should be included.</p>	Japan	<p>NZ considers that the current structure could be retained, this paragraph is part of the discussion in 2.2.1.</p>
109	<p>In the case that the quality level is expressed in terms of the percentage of nonconforming items, the distinction between acceptance sampling and conformity assessment is quite clear; the measurand is defined for the individual items, and thus the question of conformity to a specified requirement can only be framed in relation to the individual items. However, lot acceptance or rejection is not decided on the basis of the compliance or non-compliance of an individual item; instead, the acceptance criterion is expressed in terms of the percentage of nonconforming items, i.e., in terms of the distribution of the property of interest among the items in the lot. The differences between acceptance sampling and conformity assessment are summarized in the following table.</p> <p>4. We suggest the table on page 7 should be labelled as 'Table 1: Differences between acceptance sampling and conformity assessment'.</p>	Australia	<p>Agree. Amended</p>
135	<p>Acceptance Sampling Plan Performance</p> <p>5. Section 2.3, 'Acceptance Sampling Plan Performance' end of first paragraph – remove strikethrough above the full stop.</p>	Australia	<p>Agree. Amended</p>
3. Design of Sampling Plans			
171	<p>With regard to fairness must involve airness, consideration of both the consumer's risk and the producer's risk, risk is necessary to avoid situations such as the following:</p> <p>In Codex guidelines, "must" is not used and should is used instead. Japan proposes to change the beginning of the text as follows: With regard to fairness, consideration of both ...</p>	Japan	<p>Agree. Amended.</p>
174	<p>sampling plans not based on statistically valid principles, e.g. ad hoc plans or plans that do not (properly) allow for measurement uncertainty.</p>	Japan	<p>NZ considers that this text could be retained; It is quite possible that plans agreed in this way might not control the risks as intended</p>

	If both parties agree to use a sampling plans not based on statistically valid principles (e.g. empirical sampling plan), there are no issues on fairness. Deletion proposed.		and might possibly be unfair – CXG 50 will allow the evaluation of any proposed plans to help avoid these situations. Refer comment para 98.
180	managing average non-compliance rates over the medium to long term, rather than possibly paying a high premium in terms of testing costs for high levels of assurance on a lot-by-lot basis <u>basis if suitable</u> . It may be applicable to process management or continuous lot, but not applicable to testing of isolated lot at export. Propose to add "if suitable"	Japan	Agree, the text has been amended.
181	the use of 'indifference' plans that are designed around the 'Indifference Quality Level' (IQL), the level of defects at which there is 50% acceptance, rather than based on PRQ, CRQ. This leads to plans having more manageable sample sizes 'Indifference' plans and IQL are not defined in this document. For understanding of readers who are not familiar with these terms, they should be clearly defined in definition section.	Japan	Agree. Definitions to be added.
184	Specification limits 6. Section 3.2.3 'Specification limits', second paragraph, second sentence. The '(refer section 5.2.1).' may need amendments as this section '5.2.1 Measurement uncertainty' doesn't mention 'true' values.	Australia	While the true values do not need to be considered when estimating measurement uncertainty, this section refers to the true values as they relate to the specification limits.
188	It is important to consider whether a given specification limit has an in-built offset (guard band), and whether the offset reflects the measurement uncertainty associated with a particular testing procedure. Like section 2.1, this text indicates sampling plan specifies method of analysis because guard band and MU associate with method of analysis. This is not the normal practice in CCMAS. Through discussion at the plenary is needed. Note that it may request to review all of the methods of analysis in CXS234 and remove methods not associated with sampling plan – serious impact on commodity standards.	Japan	Guard-bands can be used to better control uncertainty due to sampling or analytical uncertainty (or both). Section 5 discusses ways in which the sampling plan is adjusted to allow for the analytical uncertainty arising from the testing.
192	Acceptance sampling plans are usually based on the assumption that lots are homogeneous; indeed, the international definition of a lot is 'a quantity of product produced under conditions presumed uniform'. The definition of "lot" in this text is not in line with that in section 1.3. Consistency needed.	Japan	Agree. The definition has been updated.
206	In the case of variables data, the assumed statistical distribution of the measurements in the lot must <u>should</u> also be specified, i.e. whether the characteristic is normally distributed, a compositional proportion, or follows some other distribution. If is not possible to make an assumption regarding the distribution of the data, results can be classified as attributes (as long as measurement uncertainty is	Japan	Agree.

	negligible (refer section 3.2.8), or plans based on the Fractional Nonconformance (FNC) method can be used (as long as measurement uncertainty is non-negligible (refer section 5.2.6). Use should instead must for guidelines.		
4. Sampling Plans			
316	Introduction The diagram under the introduction is suggested to be transferred to Appendix I Rationale: Appendix I demonstrate on how to select a sampling plan which can be better demonstrated through a diagram	Philippines	For consideration at the in-session WG.
322	Two-class attributes plans are defined by two numbers: the sample size n , the number of items to be taken from the lot under inspection and the acceptance number c , the maximum number of nonconforming items allowed in the sample for acceptance of the lot. If the number of nonconforming items in the sample is less than or equal to c then the lot can be accepted. If the number of nonconforming items found is greater than c then the lot is rejected. In their most general form, the number of samples n and the acceptance number c for these plans are determined from specifications of the allowable consumer's and producer's risks. It should be noted that c need not be zero (refer section 4.2.5). Brazil suggests checking if the information given in the last sentence of this paragraph is consistent: "It should be noted that c need not be zero (refer section 4.2.5)".	Brazil	This is correct – the acceptance number does not need to be zero - compliance of results does not mean compliance of the product (and vice versa), this is mentioned again in 4.2.5
355	Introduction The diagram under the introduction is suggested to be transferred to Appendix I. Rationale: Appendix I demonstrate on how to select a sampling plan which can be better demonstrated through a diagram	Philippines	For consideration at the in-session WG.
390	Introduction 7. Section 4.4.1 'Introduction', second dot point. We suggest the footer reference '12', should have the strikethrough removed	Australia	Agree. Please note the footer number has changed.
396	control during processing Since the scope of this document is for import/export inspection, this is not relevant. Deletion proposed.	Japan	Agree

399	<p>experimentation and analysis to determine further sampling procedures and uses of the material.</p> <p>It is not clear what kind of situation is expected. We propose to delete this part unless further explanation is available.</p>	Japan	<p>NZ considers that this section could be retained.</p> <p>It gives some high-level insight into the issues involved with the design of sampling plans for bulk materials, that is far from straight-forward (which is why no detail is presented). Part of the design procedure involves experimentation, possibly by computer, to assess the robustness of any proposed plan.</p>
400	<p>Sampling units are created at the time of sampling by means of some kind of sampling device. The sampling units change depending on different factors such as how the device is employed, and the conditions that the device is used under.</p> <p>“Sampling device” is an important part when considering sampling. If the guideline refers to sampling device, further explanation is needed. Otherwise, deletion of reference to sampling device is acceptable.</p>	Japan	<p>NZ considers that this text could be retained.</p> <p>Section 6.1 (Physical sampling) mentions sampling devices by referring to ISO and other standards; there are too many different situations to be able to provide details in CXG 50. Search for ‘sampling’ and other key words under Standards in: https://www.iso.org/obp/ui#search</p>
404	<p>Theory of Sampling</p> <p>8. Section 4.4.2 ‘Theory of Sampling’, first paragraph, first sentence. Has ‘The Theory of Sampling provides...’, we suggest this was capitalised for a citation footnote, “Esbensen, Kim & Wagner, Cooper. (2015). Theory of sampling (TOS) - Fundamental definitions and concepts. 27. 22-25”. Suggest either removal of capitalisation, or re-insert citation footnote.</p>	Australia	<p>Agree.</p> <p>We cannot include references in CXG 50. We have removed capitalisation.</p>
406	<p>Terminology</p> <p>This text has Section 1.3 definitions. The definitions in this section should be included in Section 1.3 so that users can easily find definitions of terms.</p>	Japan	<p>The definitions for bulk sampling are not “mainstream” and do not have relevance to the remainder of the document. We suggest that they remain in this section.</p>
429	<p>Sampling operation (figure)</p> <p>Terms in the picture, such as primary sample, composite sample, laboratory sample and test sample, should be defined in definition section.</p>	Japan	<p>NZ considers the diagram is helpful to understand why sampling for bulk materials is different. The in-session WG will consider whether the diagram is retained</p>

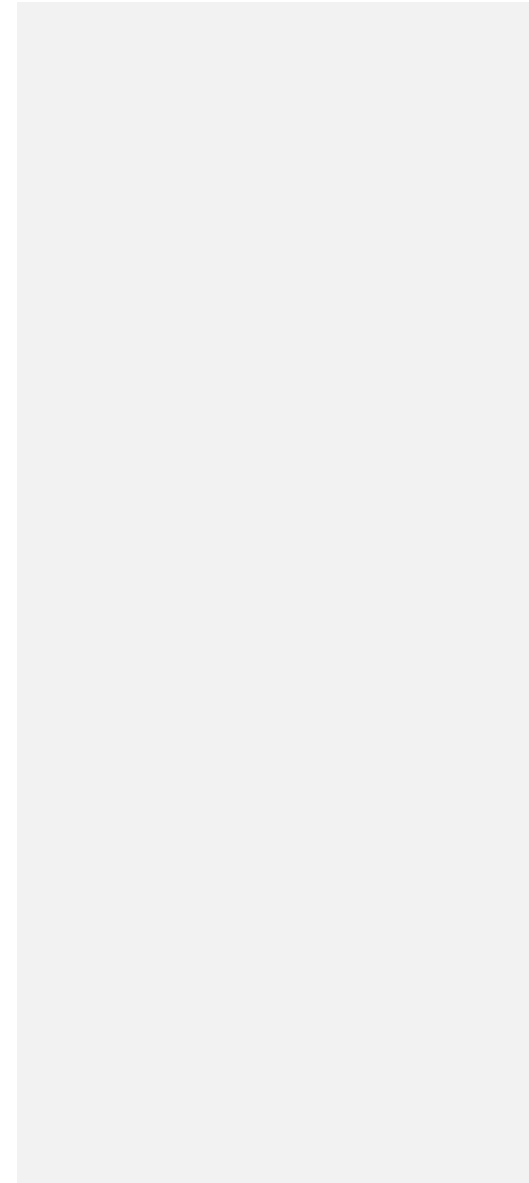
	In addition, this figure seems to be copied from somewhere. Japan is wondering if the rights of its intellectual properties are solved.		and if so, whether any commentary is needed. Please see our comment for [406] NZ will discuss copyright issues with NMKL.
430	Design of general sampling plans for bulk materials 9. Section 4.4.5 'Design of general sampling plans for bulk materials', second paragraph. Suggest amendment '.....homogeneous (refer section 3.2.74). Special techniques are required...'	Australia	Agree. Amended
447	Variables plans for bulk materials 10. Section 4.4.7 'Variables plans for bulk materials', second last paragraph, first sentence. Suggested amendment 'Since bulk materials are continuous, parts of each sample can be mixed to form a composite sample.'	Australia	Agree. Amended
468	The strategy is similar to the design of variables plans for the average level except that an additional allowance must-should be made for variation within the lot, obtainable from the statistical analysis described in section 4.4.5. A simpler approach is to estimate within lot variation as the variation among the segments by taking one sample from each segment and testing those samples in duplicate to allow adjustment for measurement uncertainty, although this will not provide any information on other components of variation: Should instead of must should be used.	Japan	Agree. Amended
5. Inspection error and measurement uncertainty			
483	Inspection error and measurement uncertainty Chapter 5 is - perhaps by the nature of the subject - quite complex. As it deals primarily with the application of acceptance sampling in certain exceptional situations, it could be moved to the e-book, where more explanations could be given and illustrated through suitable examples.	European Union	NZ/Germany have reviewed and amended this section. As well as reducing the size and removing detail that will be included in the Information Document, there have been updates in response to Eurachem comments.
484	Non-negligible analytical measurement uncertainty and inspection error have the potential to affect the probabilities of acceptance of a sampling plan. Accordingly, non-negligible analytical measurement uncertainty or inspection error must-should be taken into account in sampling inspection. Should should be used instead of must	Japan	Agree. Amended
505	Measurement uncertainty	Japan	Thank you for your comment. Germany & NZ have reviewed and updated this section and Part 5 by removing the detail that will

	Measurement Uncertainty has already been explained in CXG54, which has been just revised. Japan proposes to delete duplicated texts already included in CXG54, in order to make this guideline more focused text. We believe shorter guideline without duplication will be more helpful to users.		appear in the information document. CXG54 explains measurement uncertainty as it is normally applied in conformity assessment, where the [total] MU is used to assess whether a measurand complies with a requirement; CXG 50 discusses the use of MU in sampling inspection where the components of MU are used. (A lot cannot be a measurand).
507	A laboratory sample is a sample as prepared (from the lot) for sending to the laboratory and intended for inspection or testing This definition should be moved to definition section.	Japan	Agree. Amended Noting there are times when a definition should be retained in the text.
522	The lot standard deviation represents variation of the characteristic across items in the lot under inspection. Accordingly, it can be said that the <i>sampling</i> component of measurement uncertainty is <i>represented</i> by the lot standard deviation, even though, conceptually, sampling uncertainty is not the same as the lot standard deviation ⁴² . Accordingly, the question is whether <i>analytical</i> measurement uncertainty sources affect the calculation of the lot standard deviation ¹³ . This note conflicts with the definition of Measurement Uncertainty in CXG-54, in which measurement uncertainty does not include uncertainty from sampling.	Japan	This [522] comment has been deleted. We also note that the text relating to the lot standard deviation has been reviewed and shortened
523	The lot standard deviation is not a component of measurement uncertainty, whereas sampling uncertainty is. This text conflicts with the definition of Measurement Uncertainty in CXG-54, in which measurement uncertainty does not include uncertainty from sampling.	Japan	This [523] comment has been deleted. In general MU could include components due to sampling and analytical uncertainty; CXG 54 considers only the analytical components.
524	In statistical terms, this point can be made as follows: If the distribution of the property of interest in the lot follows a normal distribution, and if the sampling procedure is adequate (meaning that the noncentral <i>t</i> -distribution can be applied), then the calculation of the probability of acceptance takes into account the sampling uncertainty (the statistical uncertainty of the estimate of the lot standard deviation). We propose to include more explanation to help users, who are not familiar with sampling, to understand.	Japan	This footnote [524(12)] has been deleted. This provided detailed technical information. We reviewed section 5 to take out detail that will be included in the Information Document. Further explanation will be provided in the ebook.
554	For a more general model, see the Guidelines on Measurement Uncertainty (CXG 54-20004)	Japan	Agree. The [554] footnote has been amended.

	The term "approaches", instead of "model", is used in paras 12-13 of CXG54. For consistency with CXG54, we suggest to revise the sentence as follows: "For common top-down approaches, see the General guidelines on Measurement Uncertainty (CXG 54-2004)".		
6. Other Matters Relating to Sampling			
625	<p>There are usually more disadvantages than advantages with convenience sampling. There is a possibility of sampling error and lack of adequate representation of the population, and furthermore, use of convenience sampling might lead to disputes as it is neither a fair nor a valid procedure.</p> <p>We propose to delete the sentence. If both parties agree with using a convenience sampling, we do not expect any disputes about it, which is the utmost advantage in the trade.</p>	Japan	NZ considers that this text could be retained. Just because two parties might agree on a procedure does not mean there will not be disputes. Use of the guidelines and apps will reduce the chance that an suitable plan might be agreed between the parties.
626	<p>Reinspection</p> <p>Inclusion of reinspection in the guidelines on sampling is not appropriate because reinspection is related not only to sampling but to whole testing process. In addition, Codex has already developed a guideline on settling dispute over analytical values (CXG70), so that duplication is not appropriate.</p> <p>We propose to delete this section. Otherwise, in line with CXG70, we propose to include at the beginning of the paragraph as follows: Reinspection in this text can be applicable if both parties agree on using this guideline.</p>	Japan	Agree, additional text has been added into this section. There is no duplication as explained above, CXG70 provides a procedure for resolving disputes due to analytical differences but there are other possible causes of disputes (e.g. as listed in the footnote on p1 of CXG70) for which reinspection might be appropriate.
626	<p>Reinspection</p> <p>11. Section 6.2 'Reinspection', second last dot point. Suggested amendment '• the lot may have been rejected due to an inappropriate sampling procedure or poor sampling practice, or'.</p>	Australia	Agree. Amended
APPENDIX I			
647	<p>GUIDE TO THE SELECTION AND DESIGN OF SAMPLING PLANS</p> <p>Appendix I guides users through the work flow for the selection of sampling plans appropriate for the most common use cases of Codex Commodity Committees. The provided examples highlight the high number of samples that need to be tested if PRQ and CRQ are maintained at low levels of nonconforming items. Even if user will have the opportunity to 'experiment' with the ShinyApps in the e-book to find solutions requiring a lower number of samples, certain 'prefabricated' plans from the ISO standards should be offered for the orientation of less experienced users (e.g., by referring to the ISO plans in Annex II).</p>	European Union	<p>The examples document contains examples of sampling plans based on the ISO plans; it does not contain plans that control both producer's and consumer's risks in their design and it is assumed that the analytical measurement uncertainty is negligible [non-negligible analytical uncertainty is not addressed in the current GL 50 standard].</p> <p>All the plans in the examples document could be evaluated using</p>

			the apps, App1 since the analytical MU is considered negligible.
649	This section <u>Appendix</u> provides a high level summary of the principles relating to the design of sampling plans and to the various types of sampling plans discussed in the main document.	Japan	Agree
652	<i>Selection of Options for Sampling Plans</i> 1.1 Selection of Options for Sampling Plans will be easier understood if presented as decision tree Rationale: Pls. refer to the next page Figure 1. Decision Tree (word file submitted)	Philippines	For consideration by the in-session WG.
657	Are the test results expressed as pass/fail outcomes (or equivalent) or are they measurements? a. "1.Type of data" should be "Nature of the Provision" Does the provision apply to the overall distribution (most of the lot must comply) or to the average level? b. "2. Type of data" and so on.. This is demonstrated in the given examples 1 and 2 on page 38 and 40 Rationale: 1.1 Selection of Options for sampling Plan Options A. Determine Sampling Plan Options 1. Nature of the Provision Does the provision apply to the overall distribution (most of the lot must comply) or the average level? Overall Distribution Go to step 2 Average Level Go to Step 9	Philippines	Type of data relates to whether the data is attributes or variables whereas the nature of the provision relates whether the limit applies to the overall distributions or the average level.

	then adjust the succeeding numbers		
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Proposed Change (59) by Brazil (24 May 2023 15:01)

We suggest redrafting the fourth paragraph as following:

“Sampling therefore plays an important role in achieving the Codex objectives of protecting consumers’ health and ensuring fair practices in the food trade. Codex sampling plans also have an important role in harmonizing technical approaches to sampling and by results of analysis interpretation in relation to lots or consignments of foods, in the light of the relevant provision(s) of the applicable Codex standard.”

NZ considers that this section could be retained.

CXG70 covers only disputes arising from the disagreement of test results using arbitration by a third laboratory. There are other possible causes of disputes as mentioned in the footnote on p1 of CXG70 for which CXG70 is not appropriate:

It is recognized that disputes may arise from other cause(s), which should also be investigated... Possible reasons for disagreement may include one or several causes such as:

- The existence, appropriateness and statistical validity of the sampling plan used to assess the product;
- the allowances made for normal measurement error and within-lot product variation;
- differences in physical sampling procedures;
- differences in composition of the samples tested due to product inhomogeneity
- changes occurring during storage and/or transport of the product.

Reinspection can be used for these other cases, but could also be used for disputes relating to the disagreement of results.

Reference to comments re para 24.

We didn’t want to create confusion by including the specific definitions relating to bulk materials in 1.3.

In Section 4.4.3 we note that the terminology relating to sampling of bulk materials varies widely among authors and subject areas (e.g. minerals versus grains) and gives those definitions as an example.

There is no single standard defining terms used in sampling in Codex. CXG 50 definitions will be the definitive guide for sampling under this standard.

Where possible, we have used definitions from ISO standards, noting that in many cases the terminology used in Codex and ISO may vary for the same term.

However, there can be different definitions for the same term. The definitions in CXG 50 are the ones most relevant for CXG 50

The terms producer and consumer are conventional in sampling inspection and we are reluctant to move away from them. However the terms buyer’s and seller’s risks might be useful to enhance understanding - we will review.

Acceptance criterion is defined in section 1.3 – it was agreed that this term should be used instead of decision rule.

Comment (61) by Brazil (24 May 2023 15:07)

We note that the document contains definitions for terms throughout the text and not just in section 1.3. In this regard, we suggest including all definitions in a single section and aligning them with existing definitions in other Codex documents, to avoid inconsistencies and contradictions. Otherwise, it would be necessary to perform an extensive review in the Codex Standards. For example, in Annex 1 of CXS 193-1995 - General Standard for Contaminants and Toxins in Food and Feed, there is a table with definitions for laboratory sample and test portion which differs from the definitions included in table 3 (Bulk material terminology for sampling plans) of the revised General Guidelines on Sampling.

The FAO Mycotoxin Sampling Tool User Guide also mention buyer's and the seller's risks with the same meaning of exporter's risk and importer's risk mentioned in CXS 193-1995. We suggest using the terms that better reflect the intention and avoid defining consumer and producer.

There are many terms used that were not defined and should be align throughout text, such as acceptance criterion, decision criteria and decision rule.

Brazil prefers keeping, as extend as possible, the definitions already used and understood in the Codex world or mention them in the definition section all the correspondences.

Page 2: [5] Commented [RK18R17] Roger Kissling 6/12/2023 2:17:00 AM

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In Section 4.4.3 we note that the terminology relating to sampling of bulk materials varies widely among authors and subject areas (e.g. minerals versus grains) and gives those definitions as an example.

There is no single standard defining terms used in sampling in Codex. CXG 50 defintions will be the defintive guide for sampling under this standard.

Where possible, we have used definitions from ISO standards, noting that in many cases the terminology used in Codex and ISO may vary for the same term.

However, there can be different definitions for the same term. The definitions in CXG 50 are the ones most relevant for CXG 50

The terms producer and consumer are conventional in sampling inspection and we are reluctant to move away from them. However the terms buyer's and seller's risks might be useful to enhance understanding - we will review.

Acceptance criterion is defined in section 1.3 – it was agreed that this term should be used instead of decision rule.