CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 5.1, 5.2, 6.1, and 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

44th Session

Virtual

5 – 8 May and 14 May 2025

COMMENTS OF THE INTERNATIONAL UNION OF FOOD SCIENCE AND TECHNOLOGY (IUFoST)

The objective of this Conference Room Document (CRD) is to provide comments on behalf of the International Union of Food Science and Technology (IUFoST), an observer organization of the Codex Alimentarius Commission, on priority agenda items of the 44th Session of the Codex Committee on Methods of Analysis and Sampling (CCMAS44).

This CRD was prepared by the Group of Experts of the Global Food Regulatory Science Society (GFoRSS), the Disciplinary Group of the International Union of Food Science and Technology (IUFoST), with agreement of the Codex Committee of IUFoST.

The International Union of Food Science and Technology (IUFoST) represents the largest gathering of food science and technology scientists from around the world, comprising over 300,000 scientists from more than 100 countries.

Agenda Item 5.1 and 5.2: Review of methods of analysis in CXS 234

IUFoST endorses the work undertaken by CCMAS in reviewing the methods listed in CXS 234-1999.

This effort to remove inconsistencies, make editorial corrections, verify the continued fitness-for-purpose of the methods, and address issues related to typing is of great value. IUFoST strongly supports the principle that CXS 234-1999 should serve as the single reference for methods of analysis in Codex standards, as this will significantly contribute to reducing discrepancies in the future.

Agenda Item 6.1: Information Document: *General guidelines on sampling* (CXG 50–2004) – E-book with Sampling Plans Applications

IUFoST strongly supports the endorsement of the *INFORMATION DOCUMENT: GENERAL GUIDELINES ON SAMPLING (CXG 50–2004) – E-BOOK WITH SAMPLING PLANS APPLICATIONS*. This document provides valuable supplementary information to CXG 50, offering background, examples, and practical guidance on the main types of sampling plans, as well as additional insights into other sampling approaches. IUFoST considers this a highly useful resource for enhancing the understanding and application of Codex sampling guidelines.

Agenda Item 8: Methods of Analysis for Precautionary Allergen Labelling

IUFoST would like to thank the United States and the United Kingdom, respectively chair and co-chair of the Electronic Working Group (EWG) struck by CCMAS43 to offer guidance on analytical methods for allergen determination in support of the conduct of risk assessments informing the need to use a precautionary allergen labelling as a risk management approach.

The EWG offered an exhaustive list of methods (over 100) resulting from the input of stakeholders in response to the call for methods and validation data associated with allergen determination.

Reviewing the methods included in Appendix II of the discussion paper is a considerable task and requires guidance as to the parameters to be considered essential for this task.

The guidance offered by Appendix M produced by AOAC INTERNATIONAL and the EN performance standards offer great guidance for this purpose. However, IUFoST is of the view that CCMAS develop and endorse **its own performance criteria**, becoming the **global reference for Allergen Method Performance**

criteria to be used by standard setting bodies and regulators around the world to assess and report on the performance of allergen methods and guide their stakeholders in this regard.

IUFoST recommends the creation of an EWG to be tasked with this endeavor which would be indeed guided by AOAC and EN's efforts.

Once agreed upon and endorsed, it would be highly recommended that performance data on allergen methods, generated against the global reference on performance criteria, become readily available and accessible to all, to guide the "fit-for-purpose" considerations of allergen analytical methods used in food safety management practices.

IUFoST notes that, for most identified priority allergens, to achieve the detection of low-level allergen protein markers that would lead to an intake equal to or lower than the health-based guidance values (Thresholds) established by the FAO/WHO Expert consultation on food allergens, for **a 10 g food portion size**, the limit of detection/quantification of an allergen method would be **at levels at or above 100 ppm**, which is well within the performance of most methods reported by the EWG (most methods reported detect and quantify at the single digit ppm level or below). This highlights the achievability of testing low level protein allergen markers to support risk assessment informing the need to apply a precautionary allergen labelling (PAL).