



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

Thirty-fourth Session

Budapest, Hungary, 4 - 8 March 2013

COMMENTS OF INDIA

General Comment:

The document on explanatory notes should not extend or change the guidance already provided in the 'Principles for the Use of Sampling and Testing in International Food Trade (CAC/GL 83- 2013)'. Also, it need not reproduce the text in the principles that is already included in the CAC/GL 83- 2013.

Scope:

Specific Comment:

India supports the text proposed by the New Zealand which is clearer and includes reference to only governments as such agreements take effect between governments only.

Explanatory Notes to Principles

Principle 1: Transparency and agreements before initiating trade

Paragraph immediately succeeding the bullets: The agreed specifications should not restrict the flexibility

Specific Comment:

It should be deleted.

Rationale: It is too vague and general, and thus creates ambiguity in the otherwise clear guidance. It is not clear what is meant by 'flexibility of the control program' and 'general terms' in the context of the kind of information covered in the bullet points which is required to be agreed upon by the trading parties.

Principal 3: Probability of incorrect decisions

General Comment:

Within the two proposals in the square brackets, India supports the text by the New Zealand which is comparatively clearer.

Principal 4: Selecting appropriate sampling and testing procedures

Second Paragraph: The selection of sampling and testing procedures should take into account:

Bullet 3: characteristics of samples and the objectives of control

Specific Comment:

Bullet 3 is not acceptable.

Rationale: It is additional to the existing original text in the Principle 4 of the CAC/GL 83-2013 hence can be deleted. Moreover, the guidance in this extra bullet is largely covered by the second bullet under the first paragraph in the Section.

Principal 4: Selecting appropriate sampling and testing procedures

Why is selection of appropriate sampling and testing procedures needed?

General Comment:

Within the two texts in the square brackets, India supports the proposal of the New Zealand which is clearer and more informative.

Principal 4: Selecting appropriate sampling and testing procedures

The Annex provides practical examples of sampling plans**General Comment:**

Within the two texts in the square brackets, India support's the proposal of the Germany which makes reference only to Codex standards (and not to other conventions or regulations as in the other text proposed). Also, the last paragraph of the proposal by the Germany is clearer and more informative.