



**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 ISO**

ISO appreciates the opportunity to comment CCMAS papers.

**1) Comments from Mali on proposed draft principles for the use of sampling and testing in international food trade: explanatory notes (ma35-04e)**

In Mali the following methods are used:

To the level of the seed laboratory one makes the sanitary analysis on the potato (the burr and the herminia).

There are 4 methods that are used:

The specific purity (On the inert matters) one tolerates until 2% of impurities to the thimble there of the 2% matter is rejected.

The purity variétale, for the bases and meadow basis 99,9%

Seeds certified R1 99,70% R2 99.00%

The red rice is tolerated to 2g FOR 500g

The germination of the corn 90%

Rice and sorghum 80%

Niébé is to 75%

For the samplings for the gramineous: for 20T one takes 4kg

For the peanut: for 20T 2kg

For the pre bases

For the big seeds out of 10T one takes 1 sample

One makes the research of mycotoxines, the vitamins TO, the organophosphorés and the gopipole.

Mali would wish to have an adequate equipment and an accompaniment of our labs for a setting to level that will facilitate the efficient application of the procedural methods as described in the document knew city.

We know effectively to the level of the veterinary central laboratory, the staff's maladjustment to the functional devices, from where the necessity to train the staff.

Another problem is the one of the functional devices that is not used due to a lack of a fundamental element as the radio detector, the import of the radio detector is difficult for technical and scientific reasons.

The sanitary analysis of the plants is not efficient, we would wish to have the necessary technical equipment followed of the formation of the lab agents.

**2) Comment from Mali on the discussion paper on elaboration of procedures for regular updating of methods (ma 35-06e) point b)**

We share this point of view that is best adopted elsewhere for a conciliation of the points of views, and an efficient harmonisation of the technical and scientific views, for the given out on all sides concerns (producer consumer exporter will be taken in charge)

**3) Comment from the cereals sector (ISO/TC34/SC4 "Cereals and pulses") on the discussion paper on sampling in codex standards (ma 35-07e)**

## **1. Advice on the RECOMMENDATIONS FROM IAM PAPER**

Regarding the idea 4 in this paper, we support extending Codex sampling principle to other sampling procedures, because the aims of measurement on food and grains are not just for acceptance, thus the scope of Codex sampling principle should also be changed as mentioned in the idea 5.

The “net contents” should not be emphasized, because sampling, in most cases, was implemented on received base.

For idea 6, each Standard on specified materials should have its own sampling strategy, either making reference to CAC/GL 50 or to the specific table cannot fit the purposes of sampling, because no general sampling rule is available on all kinds of materials.

For idea 8, there is no need to establish that compulsive system to implement CAC/GL 50, we suggest that CCMAS set up a consultant group to help Codex Committees solving their sampling problems.

For idea 9 and 10, it will be a good practice of CCMAS to establish a guide on sampling uncertainty to facilitate the applications in Codex Committees.

For idea 12, “pragmatic” sampling plans should be refrained from Codex Standards, although in fact they seem to be popular, because they lead incorrect judgment more frequently than “scientific” ones do.

## **2. Comment on uncertainty of sampling**

In page 10 in this file, there are recommendations to Codex about uncertainty of sampling.

We note that uncertainty of sampling always exist but unfortunately it was not well recognized by Codex Committees, it is necessary to issue a Guide on Uncertainty from Sampling, however, it would be better to be included in the CAC/GL 50 instead of a separated Guide.

EURACHEM Guide UfS covers current state-of-art of approaches on quantifying uncertainty from sampling, there were consensus ways similar to the ones applied for [analytical] measurement uncertainty, hence, Codex need not discuss which way should be selected.

We disagree to consider sampling uncertainty, even the analytical uncertainty, to assess compliance to the Codex specification. Specification is a kind of technical law. When the law intends to be broken due to uncertainty of investigation, no justice could say that the law seems not broken. Producers, customers, regulators and other stakeholders should be clear there is a risk of acceptance or rejection of a batch of cargo by a Codex specification, the risk will rise when a measurement (including sampling and analysis) with high uncertainty was employed. It is the responsibility of samplers and analysts to state and minimize the risk by uncertainty or any other manner, and to prove there competence to do the measurement. Of course, stating uncertainty seems to be the scientific way. On the other hand, it is the responsibility of producers, customers and regulators to judge whether the risk can be suffered.