CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 4, 5, 6 **MAS/36 CRD/11**

Original Language Only

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

36th Session
Budapest, Hungary, 23 – 27 February 2015

(Comments of India)

Agenda Item 4

PROPOSED DRAFT PRINCIPLES FOR THE USE OF SAMPLING AND TESTING IN INTERNATIONAL FOOD TRADE: EXPLANATORY NOTES AND PRACTICIAL EXAMPLES

General Comments:

1) Bibliography may be updated. Numbering of reference to the foot note in Appendix I-CAC/GL83-2013 and integrated text as in shaded grey is confusing needs to be renumbered.

2) Appendix I & II verified- may include details of sampling plan for spices depending on acceptable Quality level that (i.e finalized) to the Annex on practical examples. May also see document CAC-GL 14-1991.

3) Sampling contributes largely to a decision of making a sample/lot/consignment compliant or non-compliant, hence the Measurement Uncertainty associated to a sampling should be considered crucial and examples for the same may be considered in the document.

There should be differentiation between contaminants and residues as residues (eg. antibiotics, pesticides etc.) are substances that can occur in foodstuffs as a side effect of using veterinary medicines or phytosanitary products and can remain in the final products. However contaminants (eg. Heavy metals, Dioxins, Mycotoxin etc.) are substances that can unintentionally enter food during production, marketing or through food chain. It is therefore, suggested to define both residue and contaminant in the document.

Specific Comments:

APPENDIX 1

SECTION 1-INTRODUCTION

FOOTNOTE 1: If a consignment is to be accepted or rejected in its entirety, the sampling should be carried out over the entire consignment.

The text is modified as under:

If a consignment is to be accepted or rejected in its entirety, the sampling should be carried out over the entire consignment **using an appropriate statistical sampling plan**.

Rationale: - More Generic.

SECTION 4-PRINCIPLES

Explanatory Notes

The Agreements should contain, for example:

Bullet 5: If the assessment procedure requires an estimate of lot inhomogeneity (e.g. a standard deviation), the method that should be used to estimate it. If the standard deviation is treated as "known", the assumed value should be scientifically based and accepted by both parties.

The text may be modified as under:

If the assessment procedure requires an estimate of lot ~~inhomogeneity~~ **homogeneity** (e.g. a standard deviation),….

Rationale:- Typo Graphical Error.

PRINCIPLE 3: PROBABILITY OF INCORRECT DECISIONS

Explanatory Notes

Para 7:- It may also be useful to take into account testing that has already been carried out in the exporter.

The text may be modified as under:

It may also be useful to take into account testing that has already been carried out ~~in~~ **by** the exporter.

Rationale:- Grammatical Error.

Agenda Item 5

DISCUSSION PAPER ON DEVELOPMENT OF PROCEDURES/GUIDELINES FOR DETERMINING EQUIVALENCE TO TYPE 1 METHODS

Specific Comment:

Para 25

Based on the discussion and the range of methods is it practical to establish one set of equivalence criteria for all Codex Methods?

If any method which is developed is validated against a specific protocol for specific equivalence criteria, the method adopted will be fit for the purpose.

If such criteria or even general procedures for evaluating equivalence were established where would they reside in Codex, as part of the Procedural Manual or in a Guidance document?

The validation protocol and the criteria can be part of a guidance document.

Agenda Item 6

DISCUSSION PAPER ON CRITERIA APPROACH FOR METHODS WHICH USE A 'SUM OF COMPONENTS'

General Comment:

Para 31

Table 2: Guidelines for establishing numeric values for the criteria:

Recovery (R):

India suggests that Recoveries should be used during a validation process and may not be considered for routine analysis as once the method validation is carried out, it becomes the criteria for individual laboratories during routine analysis.