

**U.S. DRAFT POSITIONS
for the**

**Codex Committee on
Methods of Analysis
and Sampling
(CCMAS)**

**42nd Session
Budapest, Hungary
13-16 June 2023
(virtual report adoption 20 June 2023)**

*These positions may be revised or updated prior
to the Committee meeting.*

Agenda Item 1
CX/MAS 23/42/1
Adoption of the Agenda

Background:

CCMAS will review the Provisional Agenda and consider its adoption.

U.S. Position:

The United States supports adoption of the Provisional Agenda as proposed.

Agenda Item 2
CX/MAS 21/41/2
Matters Referred to the Committee by the Codex Alimentarius Commission (CAC) and Other Subsidiary Bodies

MATTERS FOR INFORMATION

No documents posted or available as of 12 May 2023.

MATTERS FOR ACTION

No documents or matters for action posted for review.

Agenda 3
CX/MAS 21/41/3
Endorsement of Methods of Analysis Provisions and Sampling Plans in Codex Standards

Although this is captured as an Agenda Item, there are no methods posted or available as of 12 May 2023 for review.

Agenda Item 4
CX/MAS 23/42/4, 23/42/5, 23/42/6
Review of Methods of Analysis in CODEX STAN 234

Agenda Item 4.1 Fats and Oils workable package

Background:

At its 39th Session (2018), CCMAS agreed to continue efforts on the workable packages for the review and update of *Recommended Methods of Analysis and Sampling* (CXS 234-1999). “Workable Packages” are a subsection of methods considered feasible for EWG review in one year. The Committee also agreed to pilot this effort through an update of all methods related to fats and oils with the assistance of American Oil Chemists' Society (AOCS).

At its 40th session (2019), CCMAS agreed to the establishment of an electronic working group (EWG), chaired by the Netherlands, to continue the review of all the methods related to fats and oils, which was initiated by AOCS in document CX/MAS 19/40/3 Add.3 as described in the Committee report (REP 19/MAS, para.27).

At its 41st session (2021), CCMAS agreed to continue the work of methods review related to fats and oils through the re-established EWG, chaired by the Netherlands.

U.S. Position:

In general, the United States, supports the adoption of revisions to the fats and oils methods of analysis in REP21/MAS Appendix II and endorsed by CCFO (REP22/FO) and will review methods or recommend numeric criteria where appropriate.

Agenda Item 4.2 Cereal, Pulses and Legumes Workable Package**Background:**

At its 41st session (2022), CCMAS agreed to establish an EWG chaired by Canada, to review the cereals, pulses, and legumes (CPL) workable package and to work in close coordination with the relevant Standards Development Organizations (SDOs) (Cereals & Grains Association, formerly American Association of Cereal Chemists, Inc (AACCI), Association of Official Agricultural Chemists (AOAC), and International Organization for Standardization (ISO)).

U.S. Position:

The United States generally supports the adoption of the recommended revisions to CXS 234-1999 for CPL, as contained Appendix I of CX/MAS 23 42/5, with the following modifications.

Specifically, the six method entries for aflatoxins in various peanut commodities given in Appendix I should be removed and instead numeric criteria should be listed for this commodity / provision. The reason is that the Codex Committee on Contaminants in Foods (CCCF) established maximum levels for this commodity in the *General Standard for Contaminants and Toxins in Food and Feed* (CXS 193-1995) and has communicated therein the intent to use the criteria-based approach.

The United States supports providing additional guidance on specific moisture methods required when determining proximate methods including ash, fat, or protein, for example. These methods could be identified using the word “and” with the specific moisture method for each commodity / provision entry or could be provided in a footnote. If CCMAS decides to use the footnote option, the United States suggests the following wording: “If a correction for moisture content is required for reporting results of any proximate methods (e.g., ash, protein and fat), the moisture method should correspond to the matrix being tested.”

Agenda Item 4.3 Processed Fruits and Vegetables Workable Package**Background:**

At its 41st session (2022), CCMAS agreed to establish an EWG chaired by the United States, to review the processed fruits and vegetables (PFV) workable package.

U.S. Position:

As EWG chair, the United States prepared the working document for Agenda Item 4.3 (CX/MAS 23/42/6), which recommended editorial revisions to some methods, and proposed questions on the preferred format of broadly applicable PFV methods. CCMAS is invited to consider whether the proposed changes may improve the usefulness of CXS 234-1999.

Agenda Item 5

CX/MAS 23/42/7

Information document: *Guidelines on Measurement Uncertainty* (CXG 54-2004)

Background:

At the 40th Session of CCMAS (2019), the Committee took several decisions relating to the revision of the *Guidelines on Measurement Uncertainty* (CXG 54-2004) including the transfer of examples to an Information Document. CCMAS41 (2021) continued consideration of the revisions and advanced the revised *Guidelines* to Step 8 for final adoption by CAC44 (2021). CAC44 adopted the revised text.

U.S. Position:

The United States continues to support the further development of the Information Document. The current draft is quite technical in nature. While it will likely serve as a useful reference to many, it is unclear if it would be useful to the inexperienced user. The United States would prefer to see a shorter and simpler outward facing document.

Agenda Item 6

CX/MAS 23/42/8

Revision of the *General Guidelines on Sampling* (CXG 50-2004)

Background:

CCMAS37 (2016) discussed the usefulness of the *General Guidelines on Sampling* (CXG 50-2004). Some members considered the current guidelines difficult to understand. Following these discussions, CCMAS agreed to establish an electronic working group (EWG) chaired by New Zealand to develop a discussion paper for consideration by the next session of CCMAS.

At the 38th Session of CCMAS (2017), New Zealand, as chair of the EWG, introduced the paper (CX/MAS 17/38/9) and explained that there was wide support in the EWG to undertake new work to simplify/update CXG 50-2004.

CCMAS40 (2019) agreed to re-establish the EWG, chaired by New Zealand and co-chaired by the United States to continue with the revision of CXG 50-2004 and the further development of a supplementary document (e-book with sampling plan apps) considering written comments submitted at the session and the comments and recommendations made during the session (REP 19 MAS, para 67-79) with a view to advancing the revised CXG 50-2004 at its next session.

CCMAS41 (2020) agreed to forward the revised General Guidelines on Sampling (CXG 50-2004) to CAC 44 for interim adoption at Step 5, to re-establish the EWG chaired by New Zealand and co-chaired by Germany, and to continue to revise CXG 50-2004 through the electronic working group. A webinar was held on 25–27 May 2022. New Zealand and Germany gave a joint presentation on the relationship between CXG 50-2004 and CXG 54-2004 and practical applications of these guidelines.

U.S. Position:

The United States is reviewing the updated document (CX/MAS 23/42/8) and does not have detailed comments at this time. The United States continues to support the updating of CXG 50-2004, with the goal of making the new *Guidelines* easier to understand and apply to the development of sampling plans. The United States encourages U.S. stakeholders with insights or opinions on the CXG 50-2004

revision to reach out to the U.S. CCMAS delegation to share their views. Interested stakeholders are welcome to share their views orally at the public meeting or no later than one week prior to CCMAS41.

Agenda Item 7

CX/MAS 23/42/9

Discussion paper on criteria to select Type II methods from multiple Type III methods

Background:

At the 40th Session of CCMAS (2019), during the discussion of the Information Document on Guidance on Process for Submission, Consideration and Endorsement of Methods, the Committee noted that when there are multiple Type III methods, there were no established criteria for identifying which method would be Type II. CCMAS agreed that Switzerland would prepare a discussion paper to investigate the extent of the problem with multiple Type III methods in CXS 234-1999 and consider the need and feasibility of establishing criteria to assist with the selection of a Type II method from multiple Type III methods.

The 41st Session of CCMAS (2022) agreed to circulate proposed criteria for selection of Type II methods from multiple Type III methods for comments, further revision if necessary, and for consideration at CCMAS42.

U.S. Position:

The United States supports continued refinement of this paper and eventual inclusion of guidance on this issue in the Information Document. The approach has been used during the Fats and Oils Workable Package and independent reviewers have used the draft selection criteria with consistent outcomes. This result is a good indicator of the value of the approach.

The United States does have questions about a couple of the criteria. For example, Criterion i states

The method explicitly validated for the commodity stated should be preferred: e.g. if a method for copper in infant formula is required, a method specifically validated for this commodity should be preferred to a method validated for milk powder.

This appears inconsistent with the Codex *Procedural Manual* statement (*Procedural Manual* Section II/ Principles for the Establishment of Codex Methods of Analysis/ General Criteria for the Selection of Methods of Analysis):

Methods of analysis which are applicable uniformly to various groups of commodities should be given preference over methods which apply only to individual commodities.

These statements appear to contradict each other, so some clarification will be needed. Additionally, the United States believes that not all the criteria are of equal value and some level of priority should be applied.

Agenda Item 9
CX/MAS 21/41/9
Report of an Inter-Agency Meeting on Methods of Analysis

The interagency meeting is to be held in person in Budapest June 11, 2023. There are no documents for review at this time.

Agenda Item 10
Other Business and Future Work

Although this is captured as an Agenda Item, there are no documents available for review.