CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING 42nd Session Budapest, Hungary 13 – 16 June and 20 June 2023 (virtual)

European Union Comments on

Agenda Item 6:

Revision of the General Guidelines on Sampling (CXG 50-2004)
(CX/MAS 23/42/8 and CL 2023/15/OCS-MAS)

Mixed Competence Member States Vote

The European Union and its Member States (EUMS) congratulate the EWG under the lead of New Zealand and co-chaired by Germany for the further development of the revision of CXG50-2004. Sampling is an essential element for the verification of provisions in Codex standards and the revision of CXG50 with the overall aim to simplify its structure and language to provide effective guidance to all CAC subsidiary bodies and interested parties for designing/selecting sampling plans, is highly welcome. The EUMS are of the opinion that the presented draft addresses in a comprehensive manner the written comments to CL 2021/10/OCS-MAS and those made during the discussion of CCMAS41, in particular the terminology related to measurement error/measurement uncertainty, which has been aligned with JCGM, ISO and EURACHEM texts. The issues around the difference between acceptance sampling and conformity assessment were also addressed and clarified.

Chapters 1-4 of the 'Reference Guidelines' provide an easy-to-read background to acceptance sampling, which will certainly be helpful for Commodity Committees to select and design relevant sampling plans for CXSs within their scope. Chapter 5 is - perhaps by the nature of the subject - quite complex. As it deals primarily with the application of acceptance sampling in certain exceptional situations, it could be moved to the e-book, where more explanations could be given and illustrated through suitable examples.

Appendix I guides users through the work flow for the selection of sampling plans appropriate for the most common use cases of Codex Commodity Committees. The provided examples highlight the high number of samples that need to be tested if PRQ and CRQ are maintained at low levels of nonconforming items. Even if user will have the opportunity to 'experiment' with the ShinyApps in the e-book to find solutions requiring a lower number of samples, certain 'prefabricated' plans from the ISO standards should be offered for the orientation of less experienced users (e.g., by referring to the ISO plans in Annex II).

The EUMS are aware that the proposed CGX50 text follows a different approach and style compared to the current version, which was the intent of the re-draft. Information provided as tables and figures in the current CGX50 will be moved to an e-book and will be provided in form of software apps, which is an appropriate and smart way of helping users to understand the impact of certain plans. Notwithstanding the idea of going digital, the EUMS welcome Annex II, which contains ISO plans in tabular form, but question why only plans indexed by PRQ (AQL) are included, since sampling

inspection of isolated lots represent the majority of applications in the Codex context, particularly, as sampling plans indexed by CRQ (LQ) are relevant for food safety related characteristics.

The EUMS again stresses the need for validating, debugging and beta-testing of the (Shiny)apps to ensure proper functioning of the system. Moreover, access and maintenance of the software have to be addressed as well.

The EUMS invites the Committee to explain the relationship of the re-drafted CXG 50 and the existing Information Document 'Practical Examples of Sampling Plans' as well as sampling plans of existing Standards, e.g. those of CXS 193.