CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING (40th Session)

Budapest, Hungary, 27 – 31 May 2019

European Union Comments on Agenda item 4

Mixed Competence Member State Vote

GUIDANCE ON ENDORSEMENT

The European Union and its Member States (EUMS) would like to thank the United States of America for their excellent work in leading the eWG and for preparing a very well structured and thorough document for consideration at the 40th CCMAS session.

The EUMS would like to submit the following comments to the outstanding questions highlighted in the document:

1. The Definition of Identical

When two methods have identical steps, rather than the same steps, it is acceptable to consider methods as identical and both can be listed. If validation studies carried out by different organisations using different representatives of matrices identified in the scope of the method exist and the resulting method performance pararmeters are equivalent, ruggedness of such a method is clearly demonstrated.

2. Type III Method when no Type II exists (Table 2.2)

Following Codex rules, Type II methods should be fully validated, whereas Type IV methods are considered as tentative when not fully validated. Therefore, the EUMS support the second option to use Type IV for those cases.

4. Section 3.2 iiia

The EUMS agree that it is primarily the task of committees and SDOs to propose methods, however, we support the notion that it is the responsibility of CCMAS to assess whether a proposed method is appropriate for checking compliance of the relevant provision(s) with a Codex standard.

Competent authorities should be able to rely on Codex methods. Type I methods should be fully validated, whereas Type IV methods may give tentative results. The revision process of STAN-234 may be the opportunity to review validation status and typing.

7. Interaction between commodity committees and CCMAS

The EUMS believe it would be more efficient if commodity committees can submit methods to CCMAS for endorsement. When CCMAS endorses the methods according to the commodity committee proposal, these should then be forwarded to the CAC for adoption without a further consultation of the commodity committee.

Finally, the EUMS recommend to use this guidance as an internal guidance document for CCMAS.