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

Budapest, Hungary, 27 – 31 May 2019

European Union Comments on
Agenda item 3

ENDORSEMENT OF METHODS OF ANALYSIS AND SAMPLING PLANS FOR PROVISIONS IN CODEX STANDARDS

Mixed Competence
Member State Vote

Agenda item 3.1 Endorsement of methods of analysis and sampling plans for provisions in Codex Standards

CCNFSDU40

The European Union and its Member States (EUMS) welcome the suggestion of CCNFSDU to replace the current methods for the determination of vitamin K, folic acid and nine minerals and trace elements in infant formula and agrees with the proposed typing of the methods. The following editorial changes in Appendix 1 shall be considered by CCMAS before endorsing them:

Page 2, Vitamin K, HPLC, should be corrected to HPLC-FL (fluorescent detection) as to indicate also the detection principle of the method. In addition, the EUMS suggest to include next to the proposed AOAC 2015.09 / ISO 21446 (Type II) also EN 14148 as Type III.

Page 2, Folic Acid, J. Chromatography A, 928, 77-90 HPLC, should be HPLC-FL instead.

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The methods of analysis listed in the tables of Appendix II refer for several provisions (moisture, ash, volatile oil, etc.) to empirical method (Type I) which have been developed by more than one standard developing organisation. As empirical methods are defining methods only one Type I method can be used for a provision unless a method has been published by two organisations and is technically equivalent. Therefore, CCSCH is invited to clarify which of the multiply listed Type I method shall be retained in the list.

On page 9, Section 9.1 Artificial colorants, the given measurement principle: Chromatography - should also include the detection method (e.g. HPLC-PDA or HPLC-DAD or HPLC-UV-VIS).

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Appendix III list different Type I methods for the same provision. As only one Type I method may be endorsed for checking compliance with the provision of the concerned standard, CCFO is invited to select to most appropriate one.

Agenda item 3.2: Dairy workable package

The EUMS would like to thank the USA and New Zeeland for the excellent work done in leading the EWG and for clearly identifying where further discussion in CCMAS is necessary regarding recommendations on the removal of methods, proposed retyping or additional information on the status of the methods listed.

The EUMS would like to suggest the following editorial change on page 7: the measurement principle for Natamycin in Cheese (and cheese rind) where HPLC is mentioned, it should be replaced by HPLC-PDA or HPLC-DAD or HPLC-UV-VIS.

Agenda item 3.3: Cereals, pulses and legumes workable package:

The EUMS would like to thank the AACCI for for submitting the document on this package. The EUMS wish to recall that CCMAS33 discussed proprietary methods and their relationship to the Codex system. The Committee noted the views that caution should be exercised when considering proprietary methods, taking into account that a proprietary method endorsed as Type I or II would give a significant commercial advantage to the manufacturer. The Committee also noted that in the absence of any other method, consideration should be given to adequate proprietary methods as at least one method of analysis should be endorsed to enforce labelling, such as in the case of gluten determination.

The currently endorsed method for gluten refers to a validation study published in a scientific journal, which is not a common way for referencing methods in CXS 234. The proposal to replace the referred scientific publication with a reference to a method standardised by AOAC and AACC is, therefore, appropriate. However, as the AOAC/AACC method builds on the use of just one commercial test-kit (R-Biopharm Catalogue R7001), the possibility for end-users to choose from is severely limited. The current reference includes test-kits from two manufacturers, both using the same antibody. In addition, the precision data reported for the original method reference and the suggested update are equivalent. Consequently, the EUMS are of the opinion that no modification of the existing method reference for gluten in CXS 234 is necessary.

Regarding the proposal to endorse AOAC 2018.15 (Gluten in oat-based gluten free foods) the EUMS believe that this issue should first be referred to CCNFSDU and then be considered by CCMAS under agenda item 3.1 on Endorsement of methods of analysis and sampling plans for provisions in Codex Standards. Therefore, the EUMS are of the opinion that it is pre-mature to endorse this method during CCMAS40.

Agenda item 3.4: Fats and oils workable package

The EUMS would like to thank AOCS for the excellent work done and invites CCMAS to take the discussion points raised into consideration.

In CX/MAS 19/40/3 Add.3 some questions of importance are raised:

- Can two methods be endorsed as Type I, when they are technically identical, but stem from different sources, with their own validation studies and data?

- How to deal with methods, validated for one commodity, but applied to a different commodity. How comparable must such commodities be to allow endorsement as type II. The document suggests endorsement as type III when a commodity is not within the validated scope. As such a method may be tentative in that case, Type IV might be more appropriate.

As these questions are not specific for the fats and oils workable package, but apply to endorsement in general, it is suggested to deal with these aspects in the guidelines for endorsement.

Finally, a general question comes to mind: does STAN 234 currently contain methods with different typing, depending on the commodity involved?