

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

Budapest, Hungary, 27 – 31 May 2019

**European Union Comments on
Agenda item 6**

REVISION OF THE *GUIDELINES ON MEASUREMENT UNCERTAINTY (CXG 54-2004)*

***Mixed Competence
Member State Vote***

The European Union and its Member States (EUMS) would like to thank Germany for the excellent work done in leading the eWG.

Concerning the questions raised under paragraph 21, the EUMS have the following comments:

- Should the two examples on acceptance sampling be part of the guideline?

As this aspect is more related to sampling and the relevant ISO standards where detailed information can be found are referenced the EUMS suggest deleting the examples from the guide and moving the examples to the information document (Appendix II).

- Should the Figure 1 (former Figure 5) be part of the guideline?

Figure 1 is a simple visualization of the possible use of measurement uncertainty for comparing a measurement result with a limit. Furthermore, the following explanations (situation i to iv) build on the visualization. Therefore, it is suggested to maintain the figure.

- During the revision of the first draft it became more and more obvious how complex the decision making process is. Furthermore, ISO 17025 attaches great importance to the decision making process. It requires that decision rules applied in conformity assessment must be based on the uncertainty of measurement and sampling. Therefore it might be reasonable to think of a guideline to explain the several ISO standards, guides and publications.

The EUMS welcome the suggestion to develop a discussion paper on the interplay of measurement uncertainty, decision rules and conformity assessment procedures as described in different ISO standards, guides and publications.

- It should be considered whether an adapted version of GL 59, chapter 4 could be included in GL 54

The EUMS wish to recall that CCMAS38 agreed that the revised version of CAC/GL 54-2004 shall avoid overlapping with the Guidelines on Estimation of Uncertainty of Results (CAC/GL 59-2006). Therefore, including a reference in CAC/GL 54-2004 to the relevant parts of CAC/GL 59-2006 should

suffice and an adapted version of table 3, chapter 4 of GL 59 could be included in the Information Document.

Concerning Appendix I, the EUMS have the following comments:

Section 8:

The definition of "lot" may need to be further expanded to be in line with the one given in other Codex texts, including major characteristics (same origin, producer etc.).

Section 18.b:

The notion of "properly perform" may need to be expressed in a more specific way. The EUMS suggest the following wording: "... verifies that the within laboratory performance parameters concord with the official standardized method".

Section 28, Figure 1

Situations ii and iii could be reinforced. It is suggested that CCMAS invites commodity committees to declare the applicable decision rules (acceptable percentage of non-compliance with specific limits) for individual commodities or group of commodities, as the commodity committees are in the best placed to do so.

Situation iv: The wording could be improved. The EUMS would like to suggest to replace the expression (This follows from $x - 2 \cdot u = 2.5 ML - 2 \cdot 0.3 \cdot 2.5 ML = ML$) by (This follows from: $X - 2 \cdot 0.3X > ML$; $X(1 - 2 \cdot 0.3) = 0.4X > ML$; $X > 2.5 ML$; $ML/0.4 = 2.5$).