**COMMENTS FROM GHANA**

**CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING**

**Thirty-fourth Session**

**Budapest, Hungary, 4 - 8 March 2013**

**General Comment**

Ghana appreciates the opportunity to submit comments on the following agenda items:

AGENDA ITEM No. 4 REP12/MAS App IV

**Proposed Draft Principles for the Use of Sampling and Testing in International Food Trade**

**Specific Comment**

**Section 1 Introduction**

**Comment 1**: Paragraph 2, sentence 3, Ghana proposes that the sentence should be rephrased to read

“~~As for~~ **The** methods of analysis~~, those~~ endorsed by Codex should be considered first.”

**Rationale:** For clarity

**Comment 2**: Paragraph 4, sentence 4, We suggest that the word “itself” is deleted.

“Risk management ~~itself~~ should be a continuing process that takes into account all new information, including scientific information,…………………. ”

**Rationale:** Its presence is superfluous.

**Section 4 Principles**

**Comment 3**: Ghana suggests merging principles 5,6,7 and 8 under the heading of principle 5 as described below:

**Principle 5: Selecting appropriate sampling and testing procedures**

The sampling and testing procedures selected should

* be scientifically based and appropriate to the commodity and lot or consignment to be sampled and tested. It should be fit for the intended purposes and applied consistently.
* take into account practical matters such as cost and timeliness of the assessment and access to lots or consignments, provided that Consumers' Risk and **Producers’ Risk** are not compromised.
* take into account analytical measurement uncertainty and its implications.
* take into account the potential variations within a lot or consignment.

**Rationale:** Principles 5, 6, 7 and 8 address similar issues under appropriate sampling and testing procedures.

**Comment 4**: We suggest the text “Producers’ Risk” be included in the bullet 2 (former Principle 6) so that it is consistent with other sections of the document.