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24	Abstract	The uncertainty of measurement is the key indicator of the quality of any experimental result. Proper consideration of this uncertainty is imperative when testing a sample against legal/compositional limits. This task can be quite challenging when the entity measured in the investigated sample is so close to the limit that its uncertainty, however estimated, critically affects decision-making. This explains the many literature contributions discussing the problem. Even though some of the most authoritative organisations have issued specific guidelines aimed at assisting the staff involved in such measurements, several aspects of conformity testing are still debated in the literature. In this review, after a short outline of existing information, somewhat more detailed insight is given into the guidelines of ASME, ISO, and Eurachem/CITAC, because they are the most useful tools for operators of testing and calibration laboratories. Some aspects of Council Directive 96/23/EC are also discussed. Insight into the contents of the mentioned documents enables emphasis of analogies and discrepancies.	
25	Keywords separated by ' - '	Conformity testing - Decision rules - Limiting values - Specification limits - Guard band - Uncertainty of measurement	

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REVIEW

Uncertainty of measurement and conformity assessment: a review

Elio Desimoni · Barbara Brunetti

Abstract The uncertainty of measurement is the key indicator of the quality of any experimental result. Proper consideration of this uncertainty is imperative when testing a sample against legal/compositional limits. This task can be quite challenging when the entity measured in the investigated sample is so close to the limit that its uncertainty, however estimated, critically affects decision-making. This explains the many literature contributions discussing the problem. Even though some of the most authoritative organisations have issued specific guidelines aimed at assisting the staff involved in such measurements, several aspects of conformity testing are still debated in the literature. In this review, after a short outline of existing information, somewhat more detailed insight is given into the guidelines of ASME, ISO, and Eurachem/CITAC, because they are the most useful tools for operators of testing and calibration laboratories. Some aspects of Council Directive 96/23/EC are also discussed. Insight into the contents of the mentioned documents enables emphasis of analogies and discrepancies.

Keywords Conformity testing · Decision rules · Limiting values · Specification limits · Guard band · Uncertainty of measurement

Introduction

It is well known that, when reporting the result of a measurement of a physical quantity, it is mandatory to give a quantitative indication of its quality, so that the user of the result can assess its reliability [1]. Such an indication is represented at best by the measurement uncertainty (MU), the value associated with the result of a measurement that characterises the dispersion of the values that could reasonably (e.g. with a given probability/confidence level) be attributed to the measurand [1]. As emphasized by the ISO Guide to the Expression of Uncertainty in Measurement (GUM), without a clear indication of their uncertainty, measurement results cannot be compared either among themselves or with reference values given in a specification or standard [1].

Unfortunately, when dealing with measurements aimed at evaluating conformity with some specification, the matter becomes quite complex when the measured entity in the sample under investigation (e.g. the concentration in chemical analyses) is so close to the specification that the MU, anyhow estimated, critically affects decision-making. This explains the uninterrupted appearance of contributions devoted to discussion of the multi-faceted aspects of considering the MU when assessing conformity to legal or compositional limits [2–32]. As can be seen, these papers, listed in chronological order, span the last fifteen years. Noticeably, a few of them appeared even after some of the most authoritative organisations issued specific guidelines aimed at assisting the staff involved in such measurements [33–36]. This is probably indicative of a still ongoing debate.

In this review, after a short outline of existing literature information a somewhat more detailed insight is given into the guidelines of ASME [33], ISO [34], and Eurachem/ CITAC [35], because they are the most useful tools for operators of testing and calibration laboratories. Of course, this paper is not aimed exhaustively at presenting the three standards, a task that would obviously require much more

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71 extensive types of presentation. Its only objective is to
72 assist a reader in approaching those guidelines and
73 comparing the basic concepts presented therein. Council
74 Directive 96/23/EC [36] is also mentioned and partly
75 discussed. Insight into some of the basic contents of these
76 four last documents [33–36] enables emphasis of a few
77 analogies and discrepancies.

78 **Interpreting analytical results affected by measurement**
79 **uncertainty against limiting values**

80 Conformity[1] testing is the systematic examination of the
81 extent to which an entity conforms to a specified criterion
82 [34]. A specification for a measurable characteristic (for
83 example, the concentration in chemical analysis) is usually
84 formulated as a single limiting value, e.g. an upper *or* a
85 lower limiting value, LV_U or LV_L, respectively, or as a set
86 of limiting values, e.g. both an upper *and* a lower limiting
87 value. The term specification limit, SL, is also used in place
88 of limiting value.

89 Most frequently, when dealing with a set of limiting
90 values, permitted values of the characteristic are those
91 falling within the LV_L–LV_U interval. But, in some cases,
92 permitted values are those falling outside that interval. An
93 example of this last situation is that relevant to some
94 inflammable compounds [13]: if their concentration in air is
95 below a given LV_L, the gaseous mixture cannot burn or
96 explode whereas if it is above the LV_U, the mixture can
97 burn but it cannot explode. Within the two limits the
98 mixture explodes.

99 Several papers have presented the very basic aspects of
100 interpreting how experimental results, being affected by
101 MU, should be interpreted against some specification
102 limits. The problem is schematised by more or less detailed
103 figures in which different measurement results, with their
104 MU interval, are compared with ~~or without~~ a set of LVs [5,
105 7, 10, 16, 20, 26, 27, 31, 37–39]. The uncertainty interval is
106 estimated according to a given confidence level, usually
107 95% (see the next section). Most frequently, the problem is
108 presented as in Fig. 1, or as in its top half. Four possible
109 experimental situations are recognisable at each LV.
110 Occasionally, an additional situation is added in which the
111 measurement result coincides with a limit [7, 10, 37]. In
112 one case, eight different situations are considered [16]. But
113 the four situations A–D of Fig. 1 allow any possible
114 reasoning. By limiting the attention at the upper limiting
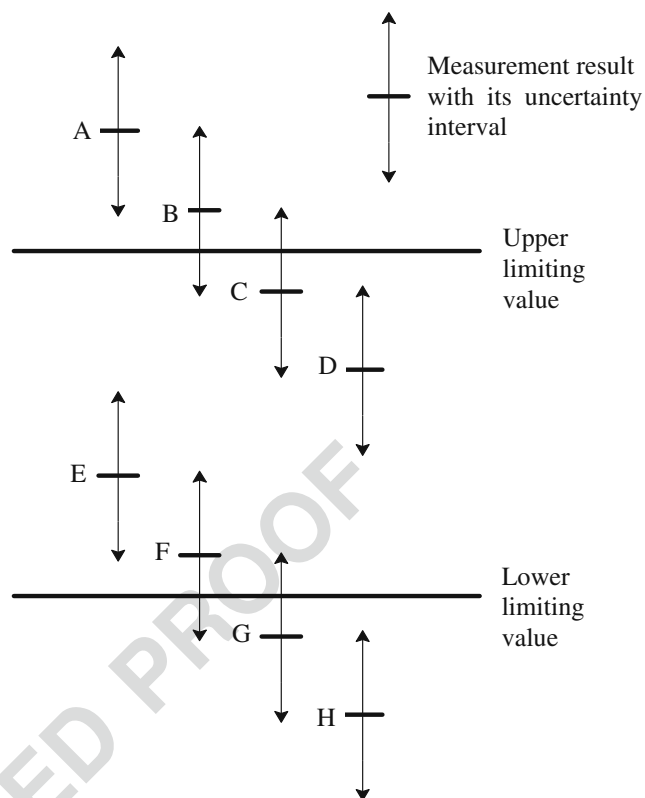115 value only, one can easily argue that in case A the product

Fig. 1 Assessing conformity when the measurement result is more or
less close to a higher or lower limit. In these figures, as usual, the
permitted values of the characteristic are those falling within the
LV_L–LV_U interval

116 does not comply with the specification, because the whole
117 uncertainty interval is above the limit, whereas in case D
118 the product complies with the specification, because the
119 whole uncertainty interval is below the limit. Of course,
120 these two cases do not pose any problem of decision
121 making at the selected confidence level.

122 In the two remaining cases, B and C, the uncertainty
123 interval encompasses the LV_U, so knowledge of the
124 measurement result does not enable any decision making—
125 the result lies in the so-called uncertainty range. Case B does
126 not allow statement of conformity at the chosen level of
127 confidence (for example, 95%) even if non-conformity is
128 more probable than conformity. The opposite applies in case
129 C, in which conformity is more probable that non-
130 conformity. Then, cases B and C are those requiring further
131 investigation. The first possibility is that allowed by using a
132 measurement method precise enough to reduce the MU
133 interval at the level necessary to move from case B to case A
134 or from case C to case D. This solution is not always
135 possible, and usually implies a substantial rise of analysis
136 cost and time. Alternatively, one can apply the two-stage
137 procedure suggested by ISO 10576–1 [34] (see the section
138 dealing with that standard). Again, additional measurements
139 are necessary so that the cost and time of the analysis are

---

[1] In many of the references cited in this paper, the word "compliance"
is used as a synonym of conformity. Strictly speaking, compliance
indicates the action of making something conform or fulfilling a
regulatory requirement.

accordingly increased. Some authors have suggested that, in cases such as B and C, stating conformity or non-conformity with a level of confidence lower than 95% is better than nothing [7, 10, 37]. However, such a possibility does not always appear realistic, as in the case of court cases in which the conformity or non-conformity statement must be "beyond reasonable doubt" [3].

Of course, the discussion about a lower limiting value (half bottom of Fig. 1) mirrors that detailed above.

It has also been reported that, even at present, it is possible that some specification makes no reference to properly considering the effects of MU on the assessment of conformity. In these cases "… it may be appropriate for the user to make a judgement of conformity, based on whether the test result is within the specified limits with no account taken of the uncertainty. This is often referred to as a *shared risk*, since the end-user takes some of the risk that the product may not meet the specification after being tested with an agreed measurement method" [37].

Finally, recent papers, when examining uncertain cases such as B and C in Fig. 1, also had the objective of evaluating the effect of MU on producer's and user's risk (usually associated to type I and, type II errors, respectively) in classification and conformity assessments [32].

Which uncertainty?

Nowadays, the term "uncertainty of measurement" is definitely used to mean the expanded uncertainty, U, obtained by multiplying the combined standard uncertainty, u_c (sometimes reported as $u_c(y)$, where y is the estimate of the measurand Y), by the coverage factor, k [1, 2, 7, 16, 22, 33–35, 37–39]. The intended purpose of U is to provide an interval around the result of a measurement that may be expected to encompass a large fraction of the distribution of values that could reasonably be attributed to the measurand [1].

The combined standard uncertainty is the total uncertainty of a measurement result estimated by properly combining all the uncertainty components affecting the whole experimental procedure. Whenever the procedure includes the sampling of the material under examination, it is mandatory considering the uncertainty of sampling among all the other uncertainty components (see for example Refs. [13–15, 34, 35, 39–42]). However, it should be also noted that the combined standard uncertainty is an estimated standard deviation relying on the assumption that no source of uncertainty has been neglected or overlooked and that, consequently, is itself affected by a more or less significant uncertainty. Also the GUM (section G 1.2) emphasizes that the value of the expanded uncertainty is at best only approximate [1].

The coverage factor is a multiplier chosen on the basis of the desired level of confidence to be associated with the interval defined by $U=k \cdot u_c$. Most frequently, k is in the range 2 to 3 [1]. When the normal distribution applies and u is a reliable estimate of the standard deviation of the measurand, $U=2 \cdot u_c$ defines an interval having a level of confidence of approximately 95% (more exactly, a level of confidence of 95.45%), and $U=3 \cdot u_c$ defines an interval having a level of confidence of approximately 99% (more exactly, a level of confidence of 99.73%). However, some aspects relevant to the concept of uncertainty still deserve specific comments.

Notwithstanding the detailed and authoritative documents intended to explain the meaning of uncertainty, it was noticed that surprisingly invalid MUs were sometimes provided, often labelled as "standard deviation" [18]. Examples of such erroneous estimates are an uncertainty resulting from calibration only, a repeatability standard deviation and a linearity of some calibration curve.

Moreover, using $k=2$ or 3 can no longer be accepted if the combined uncertainty has too few degrees of freedom [1, 19, 26]. If the effective number of degrees of freedom, ν_{eff}, is too low (for example, fewer then six according to Ref. [43], fewer than 30 according to Ref. [19]) the Student-t distribution is the most appropriate (approximate) choice for associating a level of confidence with U. It is known that ν_{eff} can be estimated by use of the Welch–Satterthwaite formula [1]. As underlined by the GUM, the experimental standard deviation of the mean of as many as thirty repeated observations of a measurand described by a normal distribution has itself an uncertainty of approximately 13% [1].

It is also possible that the reported uncertainty data look questionable. In these situations, the Horwitz equation [44–46] can sometimes provide a more realistic view [18, 19]. The equation is usually presented as:

$$RSD\% = 2^{(1-0.5 \cdot \log(mf))} \tag{1}$$

Where $RSD\%$ is the among-laboratory relative standard deviation and mf is the analyte mass fraction (e.g. $mf=10^{-6}$ means mg kg^{-1}). The equation describes the precision performances of a measurement method without regard to the nature of the analyte, the type of test material, the applied analytical technique, and the complexity of the procedure. Equation 1 is presented in Fig. 2. Acceptable performances usually provide variability values within one-half to twice the predicted $RSD\%$ [45]. Within-laboratory values are expected to be one-half to two-thirds of the among-laboratory values [46]. Even if significant deviations from the estimates obtained by the Horwitz equation are possible (Ref. [47] and references cited therein) nevertheless, the equation is still an acceptable basis for
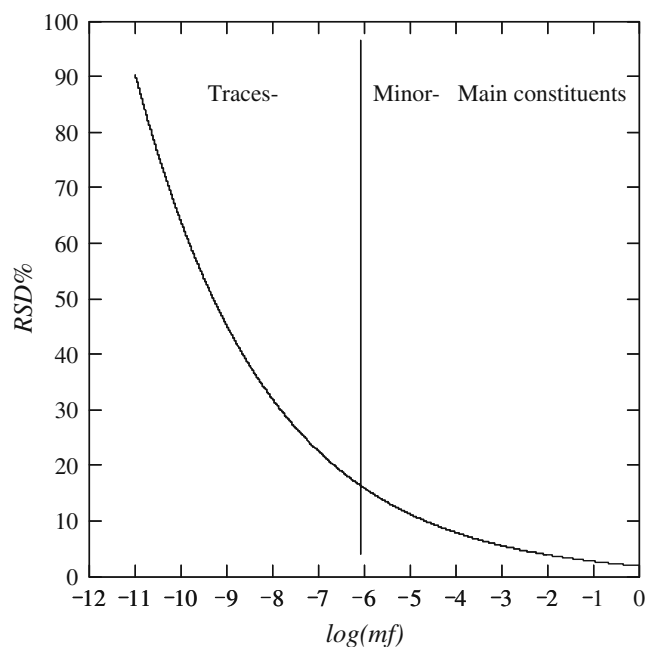
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Fig. 2 Graphical illustration of the Horwitz equation. RSD% is the among-laboratory relative standard deviation and *mf* is the analyte mass fraction

241 reviewing doping cases [18], especially when no credible
242 MU and no proficiency testing data are available, or when
243 no performance requirements are defined [19]. But it must
244 be stressed that the Horwitz equation should never be used
245 as a substitute for the experimental uncertainty estimate of a
246 result.

247   It was also worthwhile mentioning the need to avoid
248 confusion between the uncertainty associated with the
249 experimental measurements and that associated with setting
250 the conformity limiting values [17]. The latter only reflects
251 uncertainties associated with evaluating the potential
252 deleterious effects of a particular value of the characteristic
253 under examination when the entity subject to conformity
254 assessment is used in a certain context [17]. Situations in
255 which an uncertainty is associated both with the limiting
256 value and with the analytical result were also discussed [7,
257 10]. But according to the ISO 10576–1 international
258 standard (see the relevant section) the MU should neither
259 explicitly nor implicitly be referred to in the designation of
260 the *LV*s [34].

261   It was also emphasized that MU cannot be evaluated
262 without metrological traceability. This is particularly
263 mandatory in forensic contexts, in which it is important
264 that MU contains all relevant factors, including all
265 traceability chains [19].

266   Finally, it was also suggested that, if possible, much
267 more reliable conformity tests can be performed by using
268 uncertainty estimates from interlaboratory comparisons in a
269 learning process [14].

Test for conformity versus tests for non-conformity

270

A usually neglected aspect when dealing with some 271
limiting value is that, before performing a test, one should 272
decide whether it has to be a test for conformity or a test for 273
non-conformity [12, 13]. In particular, it was emphasized 274
that, if a declaration of conformity with the specifications 275
cannot be stated, it does not mean that the sample under 276
examination is in non-conformity. It can only be stated that 277
the test failed to demonstrate conformity. Likewise, if non- 278
conformity cannot be stated, it does not mean that the 279
sample under examination is in conformity with the 280
specifications [13]. The distinction between the two tests 281
is also considered by the ISO standard (see below) [34] and 282
was already emphasized by Currie [47]: "Acceptance of a 283
hypothesis, based on statistical testing, must not be taken 284
literally. More correctly, one simply fails to reject the 285
hypothesis in question. For example, non-detection of an 286
analyte does not prove its absence." and "….Assumption 287
testing, itself, rests upon assumptions. The vast majority of 288
statistical tests performed on the chemical measurement 289
process and its results, for example rely upon the 290
assumptions of randomness and normality". 291

    So, after a test for conformity, statement A can be 292
claimed: "The measurements have demonstrated, beyond 293
any reasonable doubt, that the value of the measurand is in 294
conformity with the requirements". On the contrary, after a 295
test for non-conformity, statement B can be claimed: "The 296
measurements have demonstrated, beyond any reasonable 297
doubt, that the value of the measurand is not in conformity 298
with the requirements". If the result of the selected test is 299
inconclusive, statement C can be claimed "The measure- 300
ments have not been able to demonstrate, beyond any 301
reasonable doubt, if the value of the measurand is or is not 302
in conformity with the requirements" [13]. These state- 303
ments perfectly correspond to those reported in paragraphs 304
7.2–7.4 of the ISO standard [34]. 305

Signal and concentration domains

306

In general, conformity or non-conformity tests may deal 307
with any type of target variable or measurand. When 308
dealing with most chemical analyses, the measurand is a 309
concentration, however expressed. In this case, tests are 310
relevant to comparison of the concentration of a given 311
analyte in a sample under investigation with a concentration 312
limiting value (or a set of concentration LVs). In these 313
cases, decision making is usually performed in the 314
concentration domain (CD): measurement results with their 315
MU intervals (whatever evaluated) are compared with the 316
proper legal/compositional concentration limiting value, as 317
done in Fig. 1. 318

When confronting the problem of testing for conformity with a concentration LV, some authors tried to develop alternative approaches enabling decision-making to be performed directly in the signal domain (SD), that is by comparing the signal of the sample under investigation with the signal relevant to a sample containing exactly the specified LV (e.g. to a suitable certified reference material, CRM). Then, the conclusion of the comparison had simply to be translated to the CD by a proper calibration constant. It is well known that the physical quantities of interest (concentration in this case) cannot be measured directly but are connected to the measured signals through a calibration constant [48]. This view is at the basis of some accepted approaches suitable for estimating the limit of detection (LOD), where proper statistical tests must enable evaluation of whether the concentration of the analyte in the sample under investigation is higher than zero (see, for example, among the most authoritative, Refs. [49, 50]). Of course, estimating the LOD is a problem quite similar to that of assessing conformity, where proper statistical test must enable evaluation of whether the concentration of the analyte in the sample under investigation is higher (or lower) than a limiting value.

But comparing signals requires proper consideration of both false-positive (type I) and false-negative (type II) errors: see for example the ISO approach to the LOD [50]. Approaches have been tentatively proposed for assessing conformity to some limiting values by working in the SD and considering both types of errors [4, 6, 8, 11]. Unfortunately, they suffer from disadvantages, namely the actual availability of the CRM containing exactly the concentration of the analyte specified by the limiting value, [6, 8, 11] (quite an improbable case) and, if available, the uncertainty of the analyte concentration in the analysis certificate of the CRM [20]. In subsequent papers, approaches were proposed for performing a test for conformity, or a test for non-conformity, by working in the concentration domain but, at least, by taking into account both false-positive and false-negative errors [20, 23]. In particular, an approach was proposed based on an existing model of the limit of detection [28].

Interpretative problems

Several papers were intended to deal with some peculiar aspects of conformity tests. Attention was focused at cases in which legislative limits were set below the detection capability of the existing analytical techniques [9]. The examined case study showed that legislation based on limiting values may sometimes be beyond analytical capability, and that the limited analytical capability can be exacerbated by the practice of reporting as "undetected" results falling below the limit of detection [9].

The rules for stating when a limiting value is exceeded were introduced in a paper where, after discussing the one-stage and two-stage procedures detailed in Ref. [12] and subsequently adopted by the ISO guidelines [34] (see the section about the ISO guidelines, below), the authors suggested two procedures for estimating the number of measurements necessary for appropriate reliability of the results [12, 13].

Another paper was intended to highlight some experimental problems preventing uniform implementation of legislative standards in the EU and Codex [22]. The authors emphasized that often there is no common interpretation of analytical results across the EU in the food sector, so that significantly different decisions may be taken after analysing the same sample. Particular attention directed at the consequences of reporting and using the experimental results in different ways, considering, or not, the recovery and using results including a different number of significant figures [22].

Economic aspects affecting conformity assessment were also considered by some authors. One paper discussed economic terms of common rules in conformity assessment based on measurement by extending tools of sampling when using *inspection by variable* and *inspection by attribute* [24]. Another paper discussed decision-making in conformity assessment in terms of effective cost associated with measurement, testing and incorrect decision-making [31].

Attention was also drawn to the need to provide an unambiguous and simple procedure for assessing conformity by designing really appropriate decision rules for conformity tests (see the following sections). This should require the knowledge of the acceptable level of the probability of making a wrong decision. The author emphasized that, at least in principle, the acceptable level of the probability of making a wrong decision can be determined if the cost/consequence of taking a wrong decision is known [25]. Unfortunately, as in the case of measurements concerning contaminants in foods, little or no information is usually available [25].

Finally, when introducing the methods used by accredited calibration laboratories, for example within the Deutscher Kalibrierdienst (e.g. the German accreditation body for calibration laboratories, DKD), it was also reported that when measuring a characteristic for conformity with a tolerance zone, e.g. in the case of a set of LVs, a statement of conformity should only be made if the ratio of the width of the tolerance zone to the standard uncertainty associated with the estimate of the characteristic is sufficiently large [27]. Such a condition can be quantified by the measurement capability index, C_m, e.g. the ratio of

the width of permissible values to some multiple of the standard uncertainty associated with the estimate of the characteristic [27] or, analogously, to some multiple of the standard deviation representing the variability of the process or product [32]. This aspect is also managed in the ASME document [33] (see the N:1 decision rule in the relevant section).

International standards

As anticipated in the Introduction, at present the guidelines of ASME [33], ISO [34], and Eurachem/CITAC [35] are among the most useful tools for the operators of testing and calibration laboratories involved in assessing conformity or non-conformity with given specification. This because they describe procedures sufficiently simplified to be widely interpretable and managed.

The ASME document providing guidance for assessment of electrical and mechanical products, is briefly discussed here below, because:

1. its principles inspired the Eurachem/CITAC guide [25, 26, 35]; and
2. it is a convenient introduction to the concept of guard bands and decision rules.

The terminology adopted below can differ from the original terminology used in the three documents because of the need to use the same symbols for the same object/ quantities.

The ASME B89.7.3.1-2001 guidelines

The objective of the ASME B89.7.3.1-2001 standard "Guidelines for decision rules: considering measurement uncertainty in determining conformance to specifications" (the ASME guidelines from now on) is to facilitate the development of understanding between suppliers and customers regarding proper consideration of MU in conformity tests [33]. It was prepared by the American Society of Mechanical Engineers, but it can greatly help in understanding the other guidelines because it lists some basic definitions.

According to the ASME guidelines [33], a *decision rule* is a documented rule that describes how MU will be allocated with regard to accepting or rejecting a product according to its specification and the results of a measurement. An *acceptance zone* is the set of values of a characteristic, for a specified measurement process and decision rule, that results in product acceptance when a measurement is within this zone. A *rejection zone* is the set of values of a characteristic, for a specified measurement process and decision rule, that results in product rejection when a measurement is within this zone. A *transition zone* is the set of values of a characteristic, for a specified measurement process and decision rule, that is neither in the acceptance nor rejection zone.

A *guard band* is the magnitude of the offset from the specification limit to the acceptance or rejection zone boundary.

Simple acceptance means a situation when the acceptance zone equals and is identical with the specification zone. *Simple rejection* means a situation when the rejection zone consists of all values of the characteristic outside the specification zone. *Relaxed acceptance* means a situation when the acceptance zone is increased beyond the specification zone by a guard band (Fig. 3a). In a binary decision rule, relaxed acceptance is accompanied by *stringent rejection*. *Stringent acceptance*, in contrast , means a situation when the acceptance zone is reduced from the specification zone by a guard band(s) (Fig. 3b). In a binary decision rule, stringent acceptance is accompanied by *relaxed rejection*.

It should be kept in mind that conformity tests including the choice of the guard band are based on limitations stemming from economic, health, or other fields of interest. The tests performed rely on scientific criteria and limitations, but the final decision is from the outside world.

The ASME guidelines identify different cases of acceptance and rejection zones by decision rules. In particular, it reports that the most common form of acceptance and rejection in industry is that performing simple acceptance and rejection using an N:1 decision rule. N:1 means that the measurement interval, $result \pm U$, cannot be larger than the fraction $1/N$ of the specification zone. Usually N is taken equal to 3 or 4. Of course, using this decision rule can lead to decision making problems when the measurement result is too close to the specification limit (s). Because the N:1 decision rule is not applied by the ISO and Eurachem/CITAC guidelines [34, 35], it is not considered in the following paragraphs.

To increase confidence that a rejected product is actually out of specification, e.g. by choosing a low risk for the producer, ASME guidelines apply a stringent rejection and relaxed acceptance. This means that the relaxed acceptance zone is obtained by increasing the specification zone by a Z% guard band at the specification limit or at both specification limits. Z% is the size of the guard band expressed as a percentage of the expanded uncertainty (a 100% guard band has the magnitude of U) (Fig. 3a).

Similarly, to increase confidence in product quality by reducing the probability of accepting an out-of-specification product, e.g. by choosing a low risk for the consumer, ASME guidelines apply a stringent acceptance and relaxed

Fig. 3 a Symmetric two-sided stringent rejection and relaxed acceptance according to ASME; **b** Symmetric two-sided relaxed rejection and stringent acceptance according to ASME
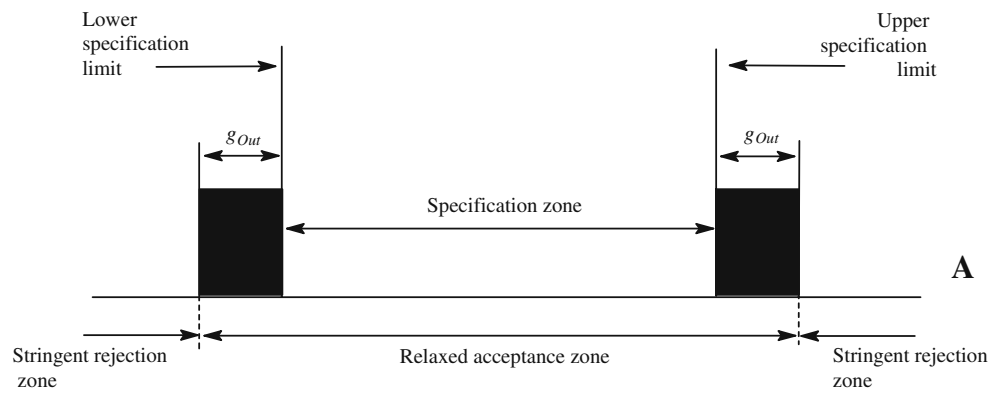
SYMMETRIC TWO-SIDED RELAXED ACCEPTANCE AND STRINGENT REJECTION ZONES (ASME B89.7.3.1-2001)
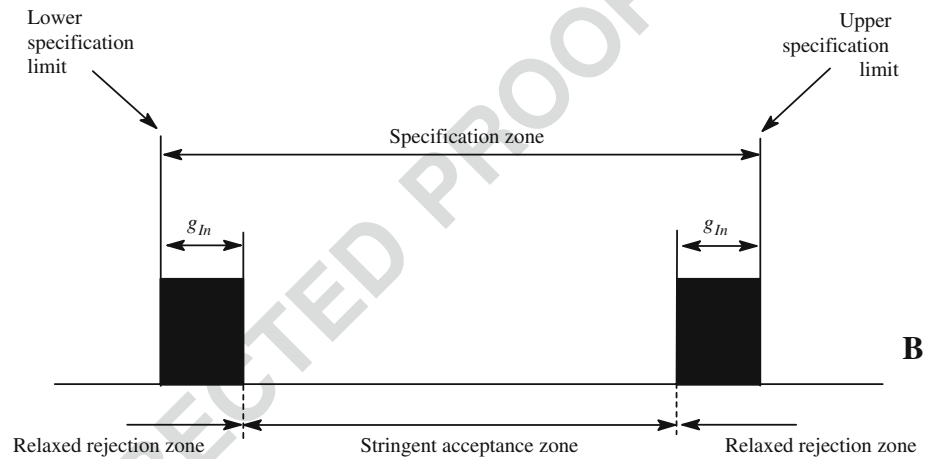
EXAMPLE OF GUARD BANDS USED FOR CREATING A BINARY DECISION RULE WITH STRINGENT ACCEPTANCE AND RELAXED REJECTION ZONES (ASME B89.7.3.1-2001)

521 rejection. Here the acceptance zone is obtained by reducing
522 the specification zone by the guard band(s) amount. Again
523 the size of the guard band is expressed as a percentage of U
524 (Fig. 3b).

525 **The ISO 10576–1 international standard**

526 The objective of the ISO 10576–1 international standard
527 (the ISO standard from now on) is to provide assurance of
528 conformity or assurance of non-conformity, either in the
529 form of supplier's declaration, or of a third party certifica-
530 tion. In its introduction, the ISO standard, also, provides
531 some definitions. Conformity testing is defined as a
532 systematic examination of the extent to which an entity
533 conforms to a specified criterion [34]. The *limiting values*
534 (*LV*) or *specification limits* (*SL*) are the specified values of
535 the characteristic giving upper and/or lower bounds of the
536 permissible values. The *region of permissible values* is the
537 interval or intervals of all permissible values of the
538 characteristic. The *region of non-permissible values* is the
539 interval or intervals of all values of the characteristic that

540 are not permissible (Fig. 4). The intervals are based on
541 accepted and required probabilities.

542 The ISO standard also details the requirements for
543 defining limiting values. The entity and the quantifiable
544 characteristic of the entity shall be clearly and unambigu-
545 ously specified, the test procedure should be a standardised
546 one and, as already cited in the section *Which uncertainty?*,
547 the MU shall neither explicitly nor implicitly be referred to
548 in the designation of the *LV*s. The ISO standard reports
549 examples of single and double *LV*s and specifies that the
550 uncertainty interval shall be determined according to the
551 GUM [1].

552 The principal feature of the ISO standard is the
553 recommendation that the conformity test be performed as
554 a two-stage procedure, in agreement with a previous
555 suggestion [12, 13]. The advantage of the two-stage
556 procedure is a substantially higher probability of declaring
557 conformity for entities with permissible values of the
558 quantity of interest (the concentration, in chemical analy-
559 ses) which are closer to the *LV*. The two-stage procedure is
560 represented in Fig. 5. By the wording "appropriate
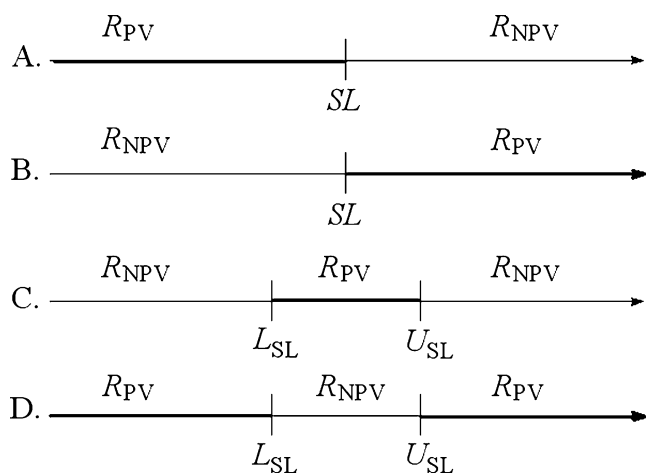561 combination of the two (set of) measurement results"

Fig. 4 Division of the domain of the characteristic in regions of permissible and non-permissible values according to ISO 10576–1. R_{PV}, region of permissible values; R_{NPV}, region of non-permissible values. **a** Case of an upper LV; **b** case of a lower LV; **c** First case of double limits (the region of permissible values is within the limits); **d** second case of double limits (the region of permissible values is outside the limits)

(Fig. 5) it is meant that, in the second stage, the decision can be taken by computing the average estimate of the quantity of interest and its uncertainty interval by using the n_2 results obtained in the second stage only or those obtained in the second stage plus the n_1 results obtained in the first stage. The one-stage procedure is applied when the two-stage procedure is not necessary, because the first stage enables the necessary decision making, or when it cannot be performed by some reason. Of course, the one-stage procedure stops at the end of the first stage of Fig. 5. Conformity/non-conformity may be assured if, after performing the measurement procedure and calculating the MU, the estimated uncertainty interval of the measurement result is inside the region of permissible/non-permissible values.

The ISO standard introduces both tests for conformity and for non-conformity, by specifying the following possibilities of reporting the results of the conformity assessment:

• Assurance of conformity: *the conformity test has demonstrated beyond any reasonable doubt that the value of the characteristic is in conformity with the requirements.*
• Assurance of non-conformity: *the conformity test has demonstrated beyond any reasonable doubt that the value of the characteristic is not in conformity with the requirements.*
• Inconclusive result: *the conformity test has not been able to demonstrate beyond any reasonable doubt that the value of the characteristic is or is not in conformity with the requirements.*

The Annex B of the ISO standard reports few illustrative examples [34].

The Eurachem/CITAC guide

The Eurachem/CITAC guide (the Guide from now on) [35] was issued more recently than the ASME and ISO standards and, as already reported, it follows the principles outlined in ASME B89.7.3.1-2001 [33]. The principles of the Guide were also detailed in a recent paper [26]. As already reported, the Guide describes typical scenarios arising when some measurement result is used for assessing compliance with an upper LV according to Fig. 1. As with the ASME guidelines [33] and ISO standards [34], the Guide assumes that uncertainty has been evaluated by the method provided by ISO [1] and Eurachem [43] and includes the uncertainty of sampling. Most of definitions are equivalent to those given by ASME and ISO. As done by ASME, the Guide emphasizes that the key to the assessment of conformity is the concept of decision rules. Decision rules enable determination of Acceptance and Rejection zones. The zones are determined in such a way that if the measurement result lies in the acceptance zone the product is in conformity with the requirements while, if it lies in the rejection zone, it is in non-conformity with the specification. In mentioning the different zones, the Guide does not mention simple, stringent, and relaxed zones as ASME does.

In addition, the Guide presents cases of more or less simple decision rules. In particular, it gives details of a decision rule set up by the *Article 6 - Interpretation of results* of Directive 96/23/EC [36] (see the next section):

1. The result of an analysis shall be considered non-compliant if the decision limit of the confirmatory method for the analyte is exceeded.
2. If a permitted limit has been established for a substance, the decision limit is the concentration above which it can be decided with a statistical certainty of $1-\alpha$ that the permitted limit has been truly exceeded.
3. If no permitted limit has been established for a substance, the decision limit is the lowest concentration level at which a method can discriminate with a statistical certainty of $1-\alpha$ that the particular analyte is present.
4. For substances listed in Group A of Annex I to Directive 96/23/EC, the α error shall be 1% or lower. For all other substances, the α error shall be 5% or lower.

As emphasized by the Guide, such statements correspond to a decision of non-conformity or rejection with low probability of false rejection (high confidence of correct

Fig. 5 Flow diagram for the two-stage procedure. I_{UOM}: uncertainty interval
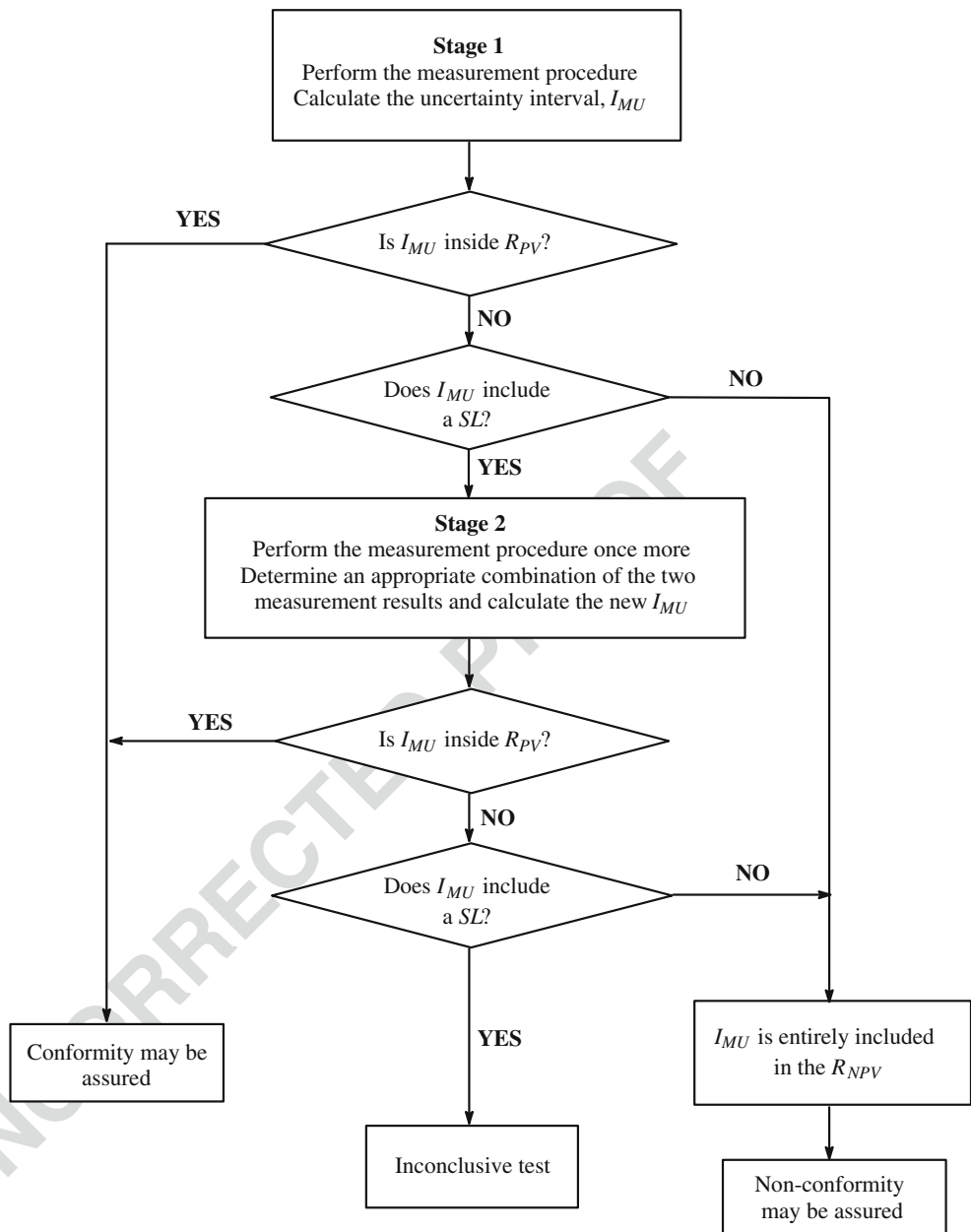
642 rejection) (Fig. 6a). It is easily observed that, in practice,
643 the acceptance zone in Fig. 5a corresponds to the relaxed
644 acceptance zone according to ASME (reported in Fig. 3a).
645 In the case presented above, the value of the guard band, g,
646 is chosen so that, for a measurement result greater than or
647 equal to $LV+g$, the probability of false rejection is less than
648 or equal to α. A typical value of α (the probability of false
649 positive errors) is 5%.
650   Analogously, in Fig. 6b the acceptance zone corre-
651 sponds to the stringent acceptance zone according to
652 ASME guidelines (reported in Fig. 3b). Some potentially
653 unclear aspects of the Eurachem/CITAC definition of
654 acceptance and rejection zones were recently discussed
655 [29, 30].

656   Appendix A of the Guide reports some examples of how
657 the guard bands can be determined. In general the size of
658 the guard band is $k \cdot u$ (see the section *Which uncertainty*?).
659 A point deserving some comment is relevant to Case 1a, in
660 which only the standard uncertainty, u, is available [35]. It
661 is reported that in many cases, current practice is to use $k=$
662 2. As stated by the Guide, on the assumption that the
663 distribution is approximately normal, this choice gives a
664 level of confidence of approximately 95% that the value of
665 the measurand lies in the interval $y \pm 2 \cdot u$. On this basis, the
666 Guide states that "the probability that the value of the
667 measurand is less than $y+2 \cdot u$ is approximately 97.5%." It is
668 likely that this last sentence can be quite perplexing to
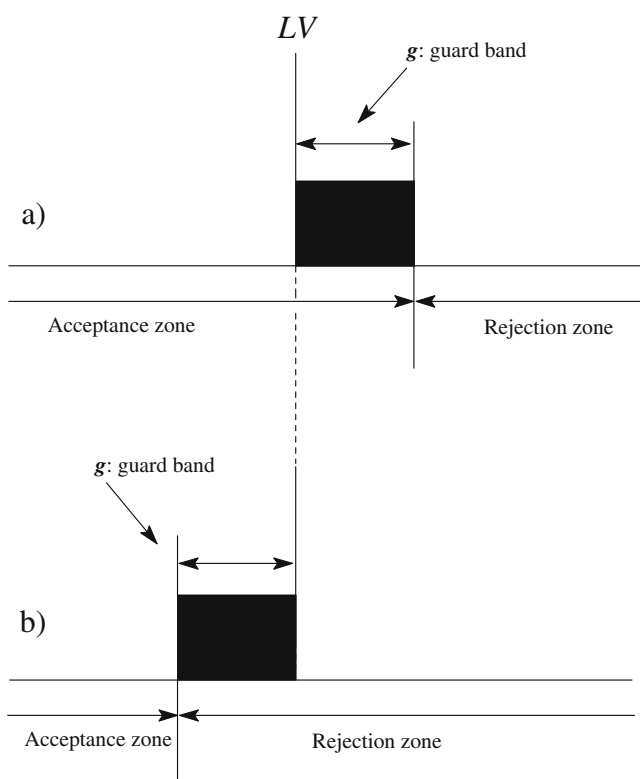669 readers not well trained in probability distributions.

Fig. 6 Acceptance and rejection zones for an upper LV according to Eurachem/CITAC

Figure 7a enables elucidation of the difference between 95%, e.g. the percentage area of the distribution included in the $y\pm2u_c$ interval, and 97.5%, e.g. the area at the left of the $y+2u_c$ value. Figure 7b displays the situation for a guard band equal to one u_c. The reported values are those obtained by the following equations for Fig. 7a:

$$\int_{y-2u_c}^{y+2u_c} f(c)dc \cong 0.954 \tag{2}$$

$$\int_{0}^{y-2u_c} f(c)dc \cong 0.023 \cong \int_{y+2u_c}^{\infty} f(c)dc \tag{3}$$

and by the following equations for Fig. 7b:

$$\int_{y-u_c}^{y+u_c} f(c)dc \cong 0.683 \tag{4}$$

$$\int_{0}^{y-u_c} f(c)dc \cong 0.159 \cong \int_{y+u_c}^{\infty} f(c)dc \tag{5}$$

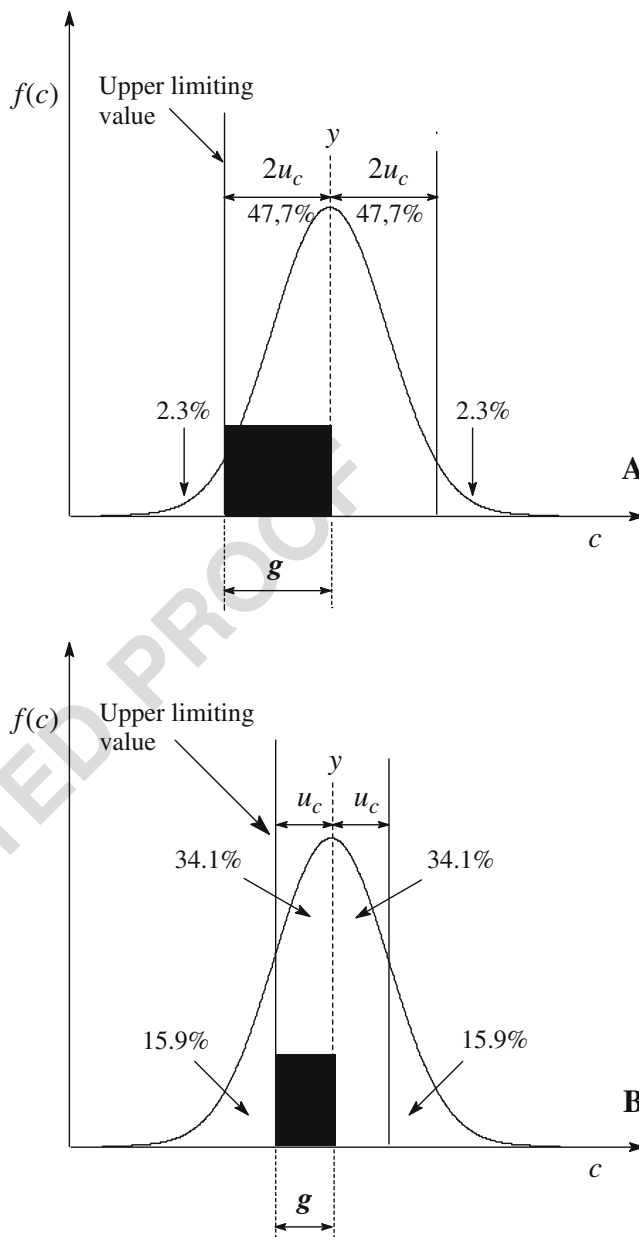**Fig. 7** **a** Explanation of the sentence "If the size of the guard band is 2·u, then the probability that *y* is less than *y*+2·u is approximately 97.5%". **b** same as **a** but the size of guard band is *u*

About Directive 96/23/EC

The Commission Decision of 12 August 2002 (the Decision from now on) was aimed at implementing Council Directive 96/23/EC concerning the performance of analytical methods and the interpretation of results obtained in the monitoring of specific substances and residues thereof in live animals and animal products, when they affect public health (available online) [36]. The Decision provides rules for the analytical methods to be used in the testing of official samples and specifies common criteria for the

interpretation of analytical results of official control laboratories for such samples. The *Article* 6 - *Interpretation of results* is reported here in the section dealing with the Eurachem/CITAC guide.

In the Annex "Performance Criteria, Other Requirements and Procedures for analytical methods" the Decision gives the following definitions:

1.11. Decision limit (CCα) means the limit at and above which it can be concluded with an error probability of α that a sample is non-compliant.

1.12. Detection capability (CCβ) means the smallest content of the substance that may be detected, identified and/or quantified in a sample with an error probability of β. In the case of substances for which no permitted limit has been established, the detection capability is the lowest concentration at which a method is able to detect truly contaminated samples with a statistical certainty of $1-\beta$. In the case of substances with an established permitted limit, this means that the detection capability is the concentration at which the method is able to detect permitted limit concentrations with a statistical certainty of $1-\beta$.

CCα and CCβ are concentration values. It follows that CCα is the upper limit of the region of permissible concentration values. The Decision should represent a qualified reference for operators of laboratories accredited for official residues control. Unfortunately, it was shown that some statements of the Decision can generate misunderstanding and/or confusion [21]. For example, Articles 3.1.2.5 and 3.1.2.6 of the Decision recommend estimation of CCα and CCβ according to ISO 11843 [51]. But ISO 11843 uses different symbols (x_C and x_D in place of CCα and CCβ), considers sample statistics (*t*-distributions) in place of population statistics (normal distributions) and estimates the two limits by use of somewhat different approaches [21]. Moreover, the Annex of the Decision explains the meaning of CCα in the ~~relevant~~ Fig. 3.2. But that figure can mislead the reader, because it reports CCα in a frequency versus *response* diagram [21] whereas CCα is a concentration. In contrast, the subsequent Fig. 3 of the Decision correctly shows CCβ in a frequency versus *concentration* diagram.

Q3

Worked examples

Worked examples in such a tricky matter as conformity testing are hardly representative of the plethora of possible experimental situations. Nevertheless, some examples representative of basic experimental situations are presented here to help readers evaluate ISO and Eurachem/CITAC approaches.

Example 1

The first example deals with the ISO approach [34] according to the flow diagram reported in Fig. 5 (the two-stage procedure).

The 98/83/EC directive on the quality of water intended for human consumption specifies the upper limit value LV_u=10 µg L^{-1} for the concentration of arsenic in drinking water [52]. When using a two-stage procedure, the sample is divided into two subsamples, and the second is only used if the uncertainty interval, I_{MU}, contains the limiting value. The ISO approach accepts uncertainty intervals given in the form of a confidence interval (subclause 6.4). Suppose that the measurements are performed with a standard measurement procedure which operates with a combined standard uncertainty of u_c= 1.485 µg L^{-1} at concentration levels around the LV_u. According to the ISO approach (Annex B, Example 2), if n independent measurements, each with uncertainty σ_Y, are performed and the arithmetic mean of the measurements is $\overline{Y}$ then the confidence interval is given as:

$$\overline{Y} \pm \frac{z_{1-\frac{\alpha}{2}} \cdot \sigma_Y}{\sqrt{n}} \qquad (6)$$

where $z_{1-\frac{\alpha}{2}}$ is the $1-\frac{\alpha}{2}$ quantile of the standard normal distribution.

A first series of three independent analyses of the arsenic concentration in the first water subsample gives the concentration $\overline{C}_{As,1} = 9.09 \mu gL^{-1}$. Using $z_{1-\frac{\alpha}{2}} = 1.96$ (often approximated to 2.0) to choose α=0.05, one can obtain the uncertainty interval:

$$I_{MU} = 9.09 \pm \frac{1.96 \cdot 1.485}{\sqrt{3}} = 9.09 \pm 1.68 \ \mu gL^{-1} \qquad (7)$$

Because the upper limit value, LV_u=10 µg L^{-1}, is within the uncertainty interval, the test is inconclusive at the given confidence level.

A second series of four independent analyses of the arsenic concentration is then performed with the second water subsample. This gives the result $\overline{C}_{As,2} = 8.66 \mu gL^{-1}$. The uncertainty interval is now:

$$I_{MU} = 8.66 \pm \frac{1.96 \cdot 1.485}{\sqrt{4}} = 8.66 \pm 1.46 \ \mu gL^{-1} \qquad (8)$$

Again the upper limit value, LV_u=10 µg L^{-1}, is within the uncertainty interval and the test is inconclusive.

The results of both set of measurements are the combined. The concentration of arsenic resulting from the seven measurements is: $\overline{C}_{As} = \frac{\overline{C}_{As,1} \cdot 3 + \overline{C}2 \cdot 4}{7} = 8.84 \mu gL^{-1}$. The new I_{MU} is:

$$I_{MU} = 8.84 \pm \frac{1.96 \cdot 1.485}{\sqrt{7}} = 8.84 \pm 1.10 \ \mu gL^{-1} \qquad (9)$$

788 This uncertainty interval is all below the LV_u. This last
789 result enables the statement of conformity with the
790 specified limit at the given confidence level.

791 **Example 2**

792 The second example deals with the Eurachem/CITAC
793 approach [35]. In this case, one should define the size of
794 the guard band and choose to perform a test enabling high
795 confidence of correct rejection (as in Fig. 6a) or high
796 confidence of correct acceptance (as in Fig. 6b).
797 Commission regulation (EU) No 105/2010 of 5 February
798 2010 amending Regulation (EC) No 1881/2006 setting
799 maximum levels for specific contaminants in foodstuffs
800 with regard to ochratoxin A specifies the upper limit value
801 LV_u=80 μg kg^{-1} for the concentration of ochratoxin A in
802 liquorice extract [53]. Suppose that the combined uncer-
803 tainty of a measurement method, evaluated before
804 performing the necessary measurements, is 3.5 μg kg^{-1}.
805 By using the above data, choosing α=0.05 and performing
806 the test enabling high confidence of correct acceptance, the
807 guard band is equal to 1.65·3.5=5.775 μg kg^{-1}. The
808 guard band is subtracted from the upper limit value. The
809 acceptance zone then extends to 80−5.775=
810 74.225 μg kg^{-1}. Suppose that the concentration of
811 ochratoxin A in two samples are 86.07 μg kg^{-1} and
812 72.33 μg kg^{-1}. The first sample is rejected and the second
813 is accepted. In contrast, when performing the test is to
814 enable high confidence of correct rejection, the guard band
815 is added to the upper limit value. The acceptance zone then
816 extends to 80+5.775=85.775 μg kg^{-1}. In this second case,
817 both samples are accepted.

818 **Conclusions**

819 This literature information confirms that some aspects of the
820 assessment of conformity with legal or compositional limiting
821 values deserve further developments. A general agreement
822 exists about the need to properly take into account the
823 uncertainty of measurement in decision making, and use of
824 the correct MU (including the sampling uncertainty compo-
825 nent and estimated according to GUM). But problems still
826 exist, especially concerning the need for unification and/or
827 unequivocal formulation of the wording of prescriptions by
828 the regulatory Authorities. Finally, decision making could be
829 greatly facilitated by issuing really unified and, consequently,
830 generally agreeable and usable guidelines.

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