

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FATS AND OILS

Twenty-Eighth Session

Kuala Lumpur, Malaysia

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### COMMENTS OF EAST AFRICAN COMMUNITY (EAC)

The EAC appreciates the opportunity to provide comments on different agenda items to be discussed by the 28<sup>th</sup> Session of the Codex Committee on Fats and oils (CCFO28). The following are the comments from the EAC for consideration.

#### ITEM 1: ADOPTION OF THE AGENDA

The EAC supports the adoption of the Provisional Agenda items as circulated.

#### ITEM 2: MATTERS ARISING FROM THE CODEX ALIMENTARIUS COMMISSION AND OTHER SUBSIDIARY BODIES

The EAC takes note of matters arising from the 44<sup>th</sup>, 45<sup>th</sup>, and 46<sup>th</sup> sessions of the Codex Alimentarius Commission (CAC44, CAC45, and CAC46) and its executive committee (CCEXEC81, CCEXEC82, CCEXEC83, CCEXEC84, and CCEXEC85) and other Codex Subsidiary bodies relating to the Codex Committee on Fats and oils. The matters noted include standards that were adopted and new work items that were proposed among others.

#### ITEM 3: CONSIDERATION OF THE RECOMMENDATIONS OF THE REPORTS OF THE 90<sup>TH</sup> AND 91<sup>ST</sup> MEETING OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA)

**General comment:** The EAC would like to thank the joint FAO/WHO JECFA Secretariats on their work: the Joint FAO/WHO Expert Committee on Food Additives has addressed issues on. previous cargoes and other contaminants

The EAC takes note of the matters of information from the 90th and 91st Meeting of the Joint FAO/WHO Expert Committee on Food Additives (JECFA)

The EAC further lauds the reliable information published on the Global Food Consumption Databases and ongoing activities to support countries to generate and to use data for risk analysis purposes, as this will significantly reduce costs of research in developing countries.

However, the EAC seeks clarification from JECFA on their assessment of mineral oil products due to issues of cross-contamination, and the fact that the evaluation assumed that mineral oil products shipped as previous cargoes are highly refined food-grade products free of Mineral Oil Aromatic Hydrocarbons (MOAH.)

**Rationale:** There is a possibility of cross-contamination of mineral oil products during transportation. Additionally, the report states that the evaluation of mineral oils assumed that mineral oil products shipped as previous cargoes are highly refined food-grade products free of Mineral Oil Aromatic Hydrocarbons (MOAH).

#### ITEM 4.1: PROPOSED DRAFT AMENDMENT/REVISION TO THE STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999): INCLUSION OF AVOCADO OIL

**General Comment:** The EAC thanks the EWG chaired by Mexico and co-chaired by the United States of America for this work and supports the efforts to amend the Standard on Named Vegetable Oils (CXS 210-1999) for the inclusion of avocado with the following proposals.

**Table 1**

**Comment:** The EAC suggests that “—” be replaced with “ND” and add "ND—Non-detectable, defined as  $\leq 0.05\%$ " below Table 1.

**Rationale:** The proposed representation of "Non-detectable" is for consistency with CXS 210.

**Table 2**

**Editorial Comment:** The EAC suggests the amendment of the expression of units for Refractive index in Table 2 to read as (nD 40°C) instead of (ND 40°C).

**Table 3**

**Comment:** The EAC agrees with the set minimum limit of 79% beta-sitosterol as a percentage of total sterols.

**Rationale:** Data from the EAC region is within the proposed range. Setting a limit below 79% is likely to encourage adulteration with other oils of low quality.

**Comment:** The EAC agrees with the set maximum limit of 1.5% Delta 7- stigmastanol as a percentage of total sterols.

**Comment:** The EAC proposes the upper limit of total sterols to be increased to 7,500mg/Kg.

**Rationale:** The region's avocados are grown under different agro-ecological zones that range from high to low altitudes, and coupled with variations in varieties may result in higher total sterols above 6,500mg/Kg as obtained from the current analytical data from the region's avocado oil processors.

**Comment:** The EAC proposes that the committee consider the range of 1.0-2.5% for clerosterol.

**Rationale:** Data from the region has indicated some varieties of avocado oil with clerosterol levels above 2.0%

**ITEM 4.2: PROPOSED DRAFT AMENDMENT/REVISION TO THE STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999): INCLUSION OF CAMELLIA SEED OIL**

**General comment:** The EAC would like to thank the Electronic Working Group chaired by China for their good work. The EAC supports CCFO28 to consider the proposed amendments/revisions to the Standard for Named Vegetable Oils (CXS 210-1999) to include the provisions for Camellia seed oil due to its unique functional attributes after consideration of the specific comments below.

**Rationale:** The amendment would enable countries and the food industry to appropriately characterize, name, and market camellia seed oil developed for improved functional and nutritional benefits for consumers and the food processing industry. Since this oil will be utilized in expanded amounts due to its favorable characteristics, it needs to have consistent naming and specifications to ensure fair trade internationally.

**Product Definition:**

**Comment:** The EAC proposes the inclusion of the word 'including' in the product definition to read:

"Camellia seed oil (youcha oil) is derived from the seeds of cultivated Camellia species (**including** *C. oleifera*, *C. oleifera* var. *meiocarpa*, *C. chekiangoleosa*, and *C. vietnamensis*)."

**Rationale:** The definition only includes 4 species of camelia as sources of the oil and this will be too limiting for the various other species of Camelia from which the oil may be derived including *Camelia sinensis* (Linnaeus).

**Table 3 and Table 4**

**Comment:** The EAC notes and further seeks clarification on the total ranges of sterols in mg/kg of 100-4,000 and total tocopherols and tocotrienols of 70-1000 on whether the ranges are justifiable based on the Camelia varieties from which the oil is derived.

**Rationale:** The range is too broad and may allow for undetected adulteration of Camellia seed oil with other oils or with low quality oil, especially in the case of tocopherols, where very low levels of tocopherols in crude oils, below their natural range. Therefore, the EAC advises for further data collection from several samples obtained from different varieties from different climatic and geographical location to aid in setting of the proposed broad range.

**ITEM 4.3: PROPOSED DRAFT AMENDMENT/REVISION TO THE STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999): INCLUSION OF SACHA INCHI OIL**

**General comment:** The EAC would like to thank the Electronic Working Group chaired by Peru for their good work. We support the position of the EWG that CCFO28 to consider at Step 3 of the draft amendment/revision of the Standard for Named Vegetable Oils (CXS 210-1999) to include Sacha inchi oil with the following proposals:

**Rationale** Provides an opportunity to regulate Sacha inchi oil, and contribute to the safety, quality, and fairness of international food trade by protecting consumer health and removing barriers to trade.

**Clause 2.1 Product Definition**

**Comment:** The EAC proposes the deletion of the type of extraction process i.e. Cold pressing in the product definition to read:

‘Sacha inchi oil is obtained by cold pressing from seeds of sacha inchi fruit (*Plukenetia volubilis* L.).’

**Rationale:** To avoid hindrance of the innovation process and to align the text or be consistent with the current definitions in the Standard for Named Vegetable Oils (CXS 210-1999)

**Clause 3.1 GLC ranges of fatty acid composition (expressed as percentages)**

**Comment:** The EAC takes note of the contradicting values of the statement in 3.1 and Table 1 concerning Linoleic and linolenic acids. Whereas the statement in 3.1 gives values of lower limits the table is giving values as a range.

The EAC proposes the deletion of this clause “Sacha inchi oil shall contain not less than 44% linolenic acid (as a percentage of total fatty acid content) and more than 32 % linoleic acid” as the values are already indicated in Table 1.

**Rationale:** Not a useful repetition and thus may lead to confusion, and to be consistent with (CXS210-1999).

**Editorial comment:** The EAC suggests the amendment of the expression of units for Refractive index in Table 2 to read as (nD 40°C) instead of (ND 40 °C).

**ITEM 4.4: PROPOSED DRAFT AMENDMENT/REVISION TO THE STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999): INCLUSION OF HIGH OLEIC ACID SOYA BEAN OIL**

**General comment:** The EAC would like to thank the Electronic Working Group chaired by the United States of America for their good work. The EAC supports the position of the EWG that CCFO28 advances the amendment/revision to the Standard for Named Vegetable Oils (CXS 210-1999) to include high oleic acid soya bean oil after consideration of the following comments:

**Rationale:** Provides an opportunity to regulate high oleic acid soya bean oil, and contribute to the safety, quality, and fairness of international food trade by protecting consumer health and removing barriers to trade

**Clause 3.1**

**Comment:** The EAC proposes the deletion of this clause “High oleic acid soya bean oil must contain not less than 65% oleic acid (as a % of total fatty acids)”, as the values are already indicated in Table 1.

**Rationale:** Not a useful repetition and thus may lead to confusion and to be consistent with CXS 210-1999=

**Editorial comment:** The EAC suggests the amendment of the expression of units for Refractive index in Table 2 to read as (nD 40°C) instead of (ND 40 °C).

Further the EAC proposes the subtitles for Table 2, 3 & 4 to indicate the characteristics of ‘crude soya bean oil (high oleic acid)’ and not crude vegetable oil.

**Rationale:** For consistency

**ITEM 5: PROPOSED DRAFT REVISION TO THE STANDARD FOR OLIVE OILS AND OLIVE POMACE OILS (CXS 33-1981): REVISION OF SECTIONS 3, 8 AND APPENDIX**

**Comment:** The EAC thanks the Electronic Working Group (EWG) chaired by Spain and co-chaired by Argentina for the work well done.

However, the EAC would like to seek clarification of the deletions of values in the trans-fatty acid profiling alongside the minimum or maximum signs and the setting of limits to exact figures.

**ITEM 6: PROPOSED DRAFT AMENDMENT/REVISION OF THE STANDARD FOR FISH OILS (CXS 329-2017): INCLUSION OF CALANUS OIL**

**General comment:** The EAC would like to thank the Electronic Working Group chaired by Norway for their good work. We support the position of the EWG that CCFO28 considers the proposed amendments/revisions to the Standard for fish oils (CXS 329-2017) in Appendix I, CX/FO 24/28/9 to advance them in the Step process.

**Rationale:** Provides an opportunity to regulate Calanus oil, contribute to the safety, quality and fairness of international food trade by protecting consumer health and removing barriers to trade

**ITEM 7: REVIEW OF THE LIST OF ACCEPTABLE PREVIOUS CARGOES (APPENDIX II TO CXC 36-1987)**

**General comment:** The EAC thanks the Electronic Working Group chaired by Malaysia for their good work. The EAC supports the work and recommendations of the EWG that CCFO28 considers and adopts the recommendations.

**ITEM 8.1: DISCUSSION PAPER ON POSSIBLE WORK THAT CCFO COULD UNDERTAKE TO REDUCE TFAs OR ELIMINATE PHOs**

**General comment:** The EAC agrees and supports the CCFO28 to consider proposed revisions to Codex standards on fats and oils to reduce trans-fatty acid intake and to submit the project document as a new work item for approval by CAC.

**ITEM 8.2: REPLIES TO CL 2021/96-FO: PROPOSAL FOR NEW WORK ON A STANDARD FOR MICROBIAL OMEGA-3 OILS**

**General comment:** The EAC would like to appreciate the Global Organization for EPA and DHA omega 3s (GOED) for their good work specifically preparation of the discussion paper. We support the work and its advancement in the step process and that CCFO28 considers the discussion paper.

**Rationale:** Provides opportunity to regulate Microbial Omega-3 Oils as a food, contribute to the safety, quality, and fairness of international food trade by protecting consumer health and removing barriers to trade