

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 2, 3, 4.4, 5, 6, 7, 8.1, 8.2

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FATS AND OILS

Twenty-Eighth Session

Kuala Lumpur, Malaysia

19-23 February 2024

### COMMENTS OF BANGLADESH

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

##### Key Considerations 2.1

- It is recommended to adopt positions that enable CCFO to support the replacing of the provisions in existing CCFO standards related to methods of analysis and sampling with the new standardized text. Similar text for the Standard on Olive Oils and Olive Pomace Oils is welcome in the future, upon the completion of the standard review.
- It is recommended to adopt positions that enable CCFO to support of the revision of the section “Labelling of non-retail containers” in all CCFO related standards, and to note that their labeling shall be in accordance with the newly adopted General Standard for the Labelling of Non-Retail Containers of Foods (CXS 346-2021).
- It is recommended to adopt positions that enable CCFO to support the recommendation of CCEXEC83 in prioritizing and undertaking work on new standards or reviewing existing standards relating to the composition of foods, by reducing non-communicable diseases risk factors.

##### Key Considerations 2.2

- It is recommended to adopt positions that support the reconsideration of the use chlorophyll as an additive in vegetable oils to restore the natural color lost in processing or color standardization. Such use may in fact be intended to shadow a quality defect or to increase value, such as making refined oil appear to be like virgin oil, precisely as olive oil due to the greenish color generated using chlorophyll. Nevertheless, since colors are acceptable food additives for fats and oils covered in CXS 19-1981, except for virgin and cold pressed oils, an alternative color, other than chlorophyll may be suggested, characterized by a yellowish color rather than green.
- It is recommended to adopt positions that offer no objection on the use of paprika extract in dairy fat spreads covered in Standard for Dairy Fat Spreads (CXS 253-2006) and fat spreads and blended spreads covered in the Standard for Fat Spreads and Blended Spreads (CXS 256-1999), given that colors are acceptable food additives for foods covered by these standards. This usage may be requested in flavored dairy fat spreads for sensory purposes and should never be used to hide deformities or inconsistency in product appearance.

#### 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)

##### Key Considerations 3.1

- Overall, it is suggested to support the JECFA recommendation that CCFO consider revising criterion no. 2 in the Recommended International Code of Practice for the Storage and Transport of Edible Oils and Fats in Bulk (CXC 36-1987), as well as the need to provide sufficient chemical and toxicological information to allow for the evaluation of montan wax, non-food-grade calcium lignosulfonate liquid, acetic anhydride and cyclohexane as previous cargoes.

**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****Key Considerations 4.4.1**

- High oleic soya bean oil has enhanced functionality.
- The inclusion of high oleic acid soya bean oil would enable member countries to characterize, name, and appropriately market high oleic acid soya bean oil developed for improved functional and nutritional benefits for consumers and the food processing industry.
- The amendment would also facilitate fair trade practices and establish a new standard that is consistent with other similar provisions in the standard, (i.e. high oleic acid safflower oil).
- A suggestion to review the proposed range of Oleic Acid "C18:1" in high oleic acid Soya bean oil (65.0% – 87.0%) into an acceptable minimum limit instead of a range, to be more consistent with other sources of oleic acid such as virgin olive oil.
- Using colors, such as chlorophyll, in high oleic soya bean oil, should be reviewed to avoid possible confusion with olive oil.
- Overall, It is recommended to adopt positions that overall support the advancement of the standard in the Step process.

**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****Key Considerations 5.1**

- There was no sound evidence to support the proposed value of 55% as the minimum value of C18:1. To include authentic oils with low C18:1, the value of 53% shall remain.
- The use of two decimal places in the trans fatty acid limit should be supported.
- The footnote "Virgin olive oil's authenticity is not compromised if one sterol, or their minimum content, does not fall within the ranges provided for, if all other sterols and parameters tested referred to in this standard fall within the stated ranges" should be maintained in the standard.
- The increase in the value of the median of the most perceived defect for virgin olive oil from 2.5 to 3.5 with a footnote "includes the uncertainty predicted by the IOC method" shall not be supported. (to be discussed/validated by the region).

**Key Considerations 5.2**

- The removal of the provision for 1,2-diglycerides (DAGs) and for pyropheophytin "a" (PPP) and their associated analytical method as an additional quality factor in the appendix of the standard should not be adopted since these parameters are useful to determine the quality of extra virgin olive oil. (to be discussed/validated by the region).
- It is recommended to support the harmonization of the methods of analysis and to agree with the proposed list of methods in Section 8 and Section 3 of the Appendix.
- It worthy to mention that there was no consensus on most issues raised in the different sections. This is way the proposal of the Chair of the EWG that CCFO28 consider holding an in-session working group with a view to resolve outstanding issues is to be supported.
- It will be important to get the feed-back of key Olive Oil producing countries in the Near East region to inform this analysis even further

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

- It is suggested to support of the recommendation to advancing the proposed draft revision to the Codex Standard for fish Oils (CXS 329-2017) to include calanus oil.

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

- It is recommended not to have any objection on the EWG recommendations.

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

- Efforts to reduce TFA intake or eliminate PHOs by revising appropriate standards for fats and oils is always supported.
- It is important to integrate of a clear definition of PHOs and TFAs when considering revision to the standards for fats and oils,
- A need for clarification on the scope of TFA limits, sources such as TFAs from refined oils and fully hydrogenated oils or from any naturally occurring TFAs such as from ruminant sources.
- It would be important to consider the Collection of data on the processes generating small quantities of TFA (refining, trans-esterification, and interesterification) to determine whether this is an issue of concern or not, in order to develop reasonable limits that will assist in reducing TFA in the food supply.
- The elimination of PHOs in the relevant standards remain a feasible priority. It would be important to consider discussing alternative approaches with other relevant Codex committee(s) regarding TFAs, such that the declaration of total trans fats, may be more practical and effective in achieving positive public health outcomes.

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

- Overall, it is suggested to support the work to develop a new standard for microbial omega-3 oils for use in human consumption.
- Data collection on production, trade and scope of usage of such products need to be performed at a global and regional level.
- This new work could potentially align with the CCEXEC83 (2023) request to consider global efforts to achieve health and nutrition related goals by reducing non-communicable diseases risk factors when undertaking new work.