



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FATS AND OILS
Twenty-Seventh Session
Virtual, 18 - 26 October 2021
Comments from South Africa

South Africa would like to thank the European Margarine Association (IMACE) for taking the time to compile the project document.

1. Use of the term “Plant Butter”

South Africa would like to request the rationale or evidence from the Codex Committee of Fats and Oils (CCFO) on how did it come about proposing the three classes and compositions for these classes.

South Africa would like to propose that the term “plant butter” be brought to the attention of the Committee of the Joint FAO/WHO Committee of Government Experts on the Code of Principles Concerning Milk and Milk Products (CGECPMMP) and CCFO to provide guidance.

2. Essential Composition and Quality Factors

South Africa supports the work, however, there is a need for clarity in relation to the compositional requirement because the proposed amendment does not define animal fat vs animal derived ingredients. South Africa would like to propose that the composition for plant butter and plant spreads are included without deleting or replacing the current composition under section 3.1 in CXS 256-2007. Therefore, this means that there will be four product names or classes of fat spreads under sub-section 3.1.1.1 namely:

- a) Margarine – total fat of 80 – 90% derived from a combination of animal and plant-based fats and ingredients (including dairy). *Maximum animal fat content of 3%*.
- b) Plant Butter – total fat 80 – 90%, no animal fat and no animal derived ingredients, 100% plant-based composition.
- c) Fat spread – total fat < 80% derived from a combination of animal and plant-based fats and other ingredients (including dairy) *Maximum animal fat content 3%*.
- d) Plant Spread – total fat < 80% no animal fat and no animal derived ingredients, 100% plant-based composition.

South Africa requires clarity on the following concern:

- (a) The composition for plant spread has been reduced to a range 50 – 80% is there a scientific reason for this proposal.
- (b) South Africa proposes that the composition for plant spread is retained as total fat less than 80%, with no animal fat and no animal derived ingredients.