



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FATS AND OILS

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

(Comments of Burundi, European Union, Ghana, India, Kenya, New Zealand, Russian Federation, United Republic of Tanzania and FEDIOL)

Burundi

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

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

Comment:

(1) Burundi agrees with the set maximum limit of 1.5% Delta 7- stigmastenol as a percentage of total sterols.

(2) Burundi proposes the upper limit of total sterols to be increased to 7,500mg/Kg.

Rationale: The Burundi and EAC 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: Burundi proposes that the committee consider the range of 1.0-2.5% for clerosterol.

Rationale: Data from the EAC region, in which Burundi is located, has indicated some varieties of avocado oil with clerosterol levels above 2.0%

European Union

Mixed Competence

Member States Vote

The European Union and its Member States (EUMS) would like to thank to the Electronic Working Group chaired by Mexico and co-chaired by the USA for updating the draft **Standard for avocado oil**.

Avocado production is a recent and rapidly growing industry in regions where this product was not previously common, largely due to changing climate conditions. Therefore, the enlargement of area of production is likely to impact the composition of the oil. The EUMS would like, therefore, to submit the following comments:

PARAGRAPH	COMMENTS	
Table 1	Fatty acid	Avocado oil
	C16:0	11.0 – 26.0 <u>27.0</u>
	C18:1	<u>39.0</u> 42.0 – 75.0
	C18:2	7.8 – 49.0 <u>22.0</u>
	Rationale: New available data about qualitative characteristics of avocados showed a slightly different composition from that proposed in Table 1. Therefore, the EUMS propose these changes to the values in this table.	
Table 3	Campesterol: 4.0 – 8.3 <u>11</u> Beta-sitosterol: [79.0] - 93.4 Delta-7-stigmastenol: ND - [1.0] Total sterols (mg/kg): [3000] – 6500 <u>7500</u> Others: [ND] - 2.0 Rationale: The value of 6500 could exclude some avocado oils produced in Africa and Europe. The values supported originate from data of companies working with avocados from West Africa and samples from avocado oils originating from some European countries.	

Ghana

Position: Ghana has no objection to advancing the work of the proposed draft standard and therefore supports the work to amend/revise the Standard for Named Vegetable Oils (CXS 210-1999).

Rationale: The amendment/revision will be of benefit to consumers and the food processing industry. The amendment could also facilitate fair trade practices and establish a new standard that is consistent with current provisions in the standards.

India

India appreciates the work done by chair of the respective EWGs in revising the standard for named vegetable oils: Inclusion of Avocado oil, Camellia seed oil, Sacha inchi oil, High oleic acid soya bean oil. India supports the proposed amendment in Agenda 4.1, 4.2, 4.3, 4.4.

Kenya

General Comment: Kenya thanks the EWG chaired by Mexico and co-chaired by the United States of America for this work.

Table 3

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

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

Comment: Kenya agrees with the set maximum parameter of 1.5% Delta 7- stigmastenol as a percentage of total sterols.

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

Justification: Kenyan 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 Kenyan avocado oil processors.

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

Justification: Data from Kenya has indicated some varieties of avocado oil with clerosterol levels above 2.0%

New Zealand

New Zealand thanks Mexico and the USA for leading this work. We have the following comments to make:

Fatty acid composition in Table 1

New Zealand notes that based on the currently available data, avocado oils produced by New Zealand producers may fall outside of the ranges of fatty acids composition listed in Table 1. However, we understand that if the fatty acids composition ranges are made wider to accommodate avocado oils produced around the world, it may render the avocado oil to be vulnerable for adulteration. We are pleased with the inclusion of statement "Samples falling within the appropriate ranges specified in Table 3 are in compliance with this Standard. Supplementary criteria, for example national geographical and/or climatic variations, may be considered, as necessary, to confirm that a sample is in compliance with the Standard." in 3.1, which enables New Zealand's avocado oils that fall outside of the ranges in Table 3 to be compliant, after considering the geographical and climatic variations.

Stigmasterol range in Table 3

New Zealand proposes changing the range of stigmasterol from 0.3-2.0 to ND-2.0. The stigmasterol content of New Zealand avocado oil ranges from 0.1 to 0.3%.

Cis-vaccenic acid as an indicator of adulteration

New Zealand has come across a recent study showing cis-vaccenic acid (C18:1 n7) could be a potential indicator to detect avocado oil adulteration, which is also mentioned by the USA in CX/FO 24/28/4 Add.1. We understand that currently there is not enough and representative cis-vaccenic acid data for the inclusion of this fatty acid in the draft standard, and there is a need to finalise the standard to support trade and enforcement activities. We support finalising the standard for avocado oil in CCFO28 and considering a new work to amend the standard for the inclusion of cis-vaccenic acid specification in the future.

Russian Federation

The Russian Federation considers it appropriate to include avocado oil in the Standard for Named Vegetable Oils (CXS 210-1999) and supports the adoption of the proposed draft amendment/revision at CCFO28 at step 5/8.

In Table 2, the value for "Unsaponifiable matter" is inconsistent with CXS Standard 210-1999. We consider it possible to agree with the PRC's proposal to replace the value "19.0 max" with "≤19".

United Republic of Tanzania

General Comment: Tanzania 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: Tanzania suggests that "—" be replaced with "ND" and add "ND—Non-detectable, defined as ≤0.05%" below Table 1.

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

Table 2

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

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

Comment: Tanzania agrees with the set maximum limit of 1.5% Delta 7- stigmastenol as a percentage of total sterols.

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

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

FEDIOL

FEDIOL appreciated the opportunity to comment on the provisions of the draft proposal on avocado oil left for consideration at the CCFO28 meeting via the Codex Online Commenting System (OCS). With reference to the CODEX consultation CL 2023/57/OCS-FO, FEDIOL supports the values in table 3 left in square brackets as indicated below:

Beta-sitosterol: [79.0] - 93.4

Delta-7-stigmastenol: ND - [1.0]

Total sterols (mg/kg): [3000] - ~~6500~~ 7500

Others: [ND] - 2.0

Regarding the Beta-sitosterol minimum value, FEDIOL wishes to point out that the current communication replaces the value uploaded via the Online Commenting System [71.0] which was erroneous. Once the consultation is completed, the OCS unfortunately no longer allows for modifications.

Furthermore, regarding the upper value of total sterols, although outside the scope of the consultation, FEDIOL nevertheless expressed a general comment in favour of the value of 7500mg/kg, since according to the analysis of authentic samples analysed by FEDIOL members companies, the value of 6500 could exclude some avocado oils from West Africa.
