

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda item 4.31**

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## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX ALIMENTARIUS COMMISSION**

**Forty-ninth Session**

***CICG, Geneva, Switzerland***

**6-10 July 2026**

### **COMMENTS ON THE DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 29TH SESSION OF THE CODEX COMMITTEE ON FATS AND OILS (CCFO29) FOR ADOPTION BY THE 49TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION**

*Submitted by*

*Brazil, Colombia, Egypt, European Union, Paraguay, Peru, Thailand,  
United Arab Emirates, United Republic of Tanzania, United States of America (USA)  
and the Global Organization for EPA and DHA Omega-3s (GOED)*

#### **BACKGROUND**

1. This document compiles the comments on the standards and related texts submitted to CAC49 for final adoption, as indicated in the relevant circular letter (CL 2026/24-CAC). The comments include those received through the Codex Online Commenting System (OCS)<sup>1</sup>, or via email by the time this document was issued.
2. The comments in response to CL 2026/24-CAC is shown in Appendix I.

#### **EXPLANATORY NOTES ON APPENDIX I**

3. The comments received are presented in a table format, with two columns as follows:
  - **First column** – Presents the comments with the rationale.
  - **Second column** – Presents the provider of the comments (name of Member or Observer).

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<sup>1</sup> OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardized way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

## Appendix I

## COMMENTS IN REPLY TO CL 2026/24-CAC

## GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
United Republic of Tanzania (URT) accepts and supports the draft standards to be forwarded for adoption by CAC49.	United Republic of Tanzania

**REQUEST FOR COMMENTS ON THE AMENDMENTS TO THE  
CODE OF PRACTICE FOR THE STORAGE AND TRANSPORT OF EDIBLE FATS AND OILS IN BULK  
(CXC 36-1987) – APPENDIX II LIST OF ACCEPTABLE PREVIOUS CARGOES**

COMMENT	MEMBER / OBSERVER
In regard to mineral oils, Brazil has no objections in relation to the proposed solution to retain both mineral oils in the list with the addition of the qualification "highly refined food-grade," as the safety concerns raised are adequately addressed by this solution as clarified by FAO.  Regarding ethanol Brazil does not oppose the Committee's decision to maintain the list as it currently stands and suggests that further discussion should take place regarding potential risks associated with denaturants that are used in denaturated alcohol.	Brazil
El documento está listo para su adopción, con la siguiente aclaración: a) Se considera conveniente la adopción de la enmienda que incorpora el descriptor "altamente refinado, apto para uso alimentario" a las entradas de aceite mineral en la Lista de cargas anteriores aceptables del CXC 36-1987, ya que constituye un avance necesario para la protección de la inocuidad. No obstante, tal como está redactado, el descriptor no se corresponde con un referente analítico vinculante. La evaluación del JECFA que sustenta la enmienda fue realizada bajo el supuesto explícito de que el aceite mineral se encontraba libre de hidrocarburos aromáticos de aceite mineral (MOAH); si la enmienda no establece ningún mecanismo para verificar ese supuesto, entonces es necesario complementarla incluyendo una aclaración, por ejemplo: "Para los efectos de esta lista, se entiende que los aceites minerales 'altamente refinados y aptos para uso alimentario' son aquellos que cumplen con las especificaciones analíticas establecidas internacionalmente (Farmacopea Europea o USP) para aceites minerales de grado alimentario. El cumplimiento no se verifica mediante inspección portuaria, sino con base en la documentación apropiada emitida por el fabricante del producto.	Colombia
We agree with the proposed amendments to the Code of Practice for the Storage and Transport of Edible Fats and Oils in Bulk (CXC 36-1987), particularly the updates to Appendix II regarding the List of Acceptable Previous Cargoes.	Egypt
The European Union (EU) reiterates its reservation as already expressed in CCFO29.  1. Maintain mineral oil, high viscosity (CAS number 8012-95-10) and mineral oil, medium viscosity in the List of Acceptable Previous Cargoes (LOAPC).  The EU expresses its reservation regarding the retention of mineral oil high viscosity (CAS number 8012-95-1) and mineral oil medium viscosity in Appendix 2 of CXC 36-1987. MOAH fraction of mineral oils contains certain genotoxic carcinogens and would present potential health risks associated with consumer exposure. While FAO informed CCFO that mineral oil, high viscosity and mineral oil, medium viscosity had been assessed previously by JECFA as food additives it is not specified in the previous cargoes list that mineral oil medium and high viscosity should be food grade. This means that any type of oils, food grade or not, could be used as a previous cargo. Furthermore, JECFA did not assess the MOAH content of these oils. Food grade quality provides no guarantees on the absence of MOAH.	European Union
Paraguay apoya la aprobación definitiva del documento Código de Prácticas para el almacenamiento y transporte de aceites y grasas comestibles a granel (CXC 36-1987)	Paraguay
Sobre las Enmiendas al Código de prácticas para el almacenamiento y transporte de grasas y aceites comestibles a granel (CXC 36-1987), indicadas en el informe REP26/FO	Peru

apéndice IV, Parte 1; Perú manifiesta que dichas Enmiendas a la norma están listas para su adopción final.	
United Arab Emirates agrees with the final adoption of the amendments to the Code of practice for the storage and transport of edible fats and oils in bulk (CXC 36-1987)	<b>United Arab Emirates</b>
The United States supports the conclusions, including any amendments/revisions, agreed to by CCFO29 to the Code of practice for the storage and transport of edible fats and oils in bulk (CXC 36-1987). We also agree that a standard template will help streamline the process for making changes to the List of Acceptable Previous Cargoes (LOAPC).	<b>USA</b>

#### REQUEST FOR COMMENTS AT STEP 5 ON THE STANDARD FOR MICROBIAL OMEGA-3 OILS

<b>COMMENT</b>	<b>MEMBER / OBSERVER</b>
<p>Brazil agrees with the proposed draft standard that was agreed at CCFO29.</p> <p>Brazil would like to provide the following comments on the items below:</p> <p>Item 2, Part 2: Food Additive Provisions in the Proposed Draft Standard for Microbial Omega-3 Oils</p> <p>Brazil agrees with the proposed functional classes of additives, the technological justifications, and the maximum limits.</p> <p>Item 2, Part 3: Proposed Draft Revisions to the Food Categories in the GSFA to Include Microbial Oils</p> <p>Brazil agrees with the proposed amendment to food category 02.0 and the inclusion of sub-category 02.1.4, which defines microbial oils and fats, for CCFA's information and consideration.</p>	<b>Brazil</b>
<p>El documento no se encuentra listo para su aprobación por: b) Se considera conveniente contar con una norma internacional armonizada para los aceites omega-3 de origen microbiano. Sin embargo, se deben señalar algunos aspectos relacionados con la inocuidad alimentaria que deben resolverse como condición previa a la adopción definitiva:</p> <p>a. Límites de contaminantes inorgánicos no definidos. Aunque se solicitó extender a esta categoría los niveles máximos de arsénico (0,1 mg/kg) y plomo (0,08 mg/kg) establecidos en la norma CXS 193-1995, no se establecieron plazo ni valores provisionales para ello. La ausencia de límites explícitos para arsénico inorgánico y plomo no debería diferirse indefinidamente. La adopción definitiva debe condicionarse a que se adopte una decisión formal al respecto</p> <p>b. Parámetros de oxidación no resueltos. El Cuadro 2 del Apéndice III contiene valores para el índice de anisidina, el valor TOTOX y el índice de ácido no han sido establecidos formalmente. Estos parámetros miden productos de oxidación secundaria de lípidos y ácidos grasos libres cuya elevación indica deterioro del aceite con implicaciones para la salud del consumidor. Se deben establecer formalmente los límites propuestos antes de la adopción definitiva</p> <p>c. El criterio de "antecedentes de uso inocuo" no se ha definido claramente. La Sección 2.1 de la norma delega en cada país la determinación de si una fuente microbiana tiene "antecedentes de uso inocuo", pero no se especifica el tipo de evidencia científica requerida. Se debe especificar qué requisitos mínimos de evidencia científica son necesarios para evaluar los aceites omega-3 provenientes de fuentes microbianas.</p>	<b>Colombia</b>
<p>We support the advancement of the Draft Standard for Microbial Omega-3 Oils.</p> <p>In conclusion, Egypt considers these texts ready for adoption and encourages their progress during the upcoming CAC49 session .</p>	<b>Egypt</b>
Paraguay apoya el avance al trámite 5 del documento de Anteproyecto para los aceites Omega -3 de Origen Microbiano.	<b>Paraguay</b>
Respecto al Proyecto de norma para aceites omega-3 microbiano Perú manifiesta que no contamos con data científica ni producción nacional a la fecha de aceites omega-3 de origen microbiano. Sin embargo, no se opone a su avance y adopción en etapa 5, asimismo no se tienen comentarios específicos	<b>Peru</b>

Thailand has no objection to the adoption of the Draft Standard for Microbial Omega-3 Oils at Step 5	<b>Thailand</b>
United Arab Emirates acknowledges the work done by CCFO in developing the draft standard for microbial omega-3 oils. UAE supports the adoption of this standard at Step 5.	<b>United Arab Emirates</b>
The United States supports interim adoption of the draft standard for microbial omega-3 oils. We are also prepared to continue chairing the EWG.	<b>USA</b>
In response to CL 2026/24 - CAC, the Global Organization for EPA and DHA Omega-3s (GOED) supports the adoption at Step 5 by CAC49 of the draft standard for microbial omega-3 oils. Once the draft standard for microbial omega-3 oils is adopted at Step 5, GOED looks forward to participating in the EWG, chaired by the United States of America and co-chaired by China, to consider the outstanding issues in square brackets.	<b>GOED</b>