



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FATS AND OILS

Twenty-Seventh Session

Virtual, 18 – 22 October 2021 and 26 October 2021

PROPOSALS FOR NEW WORK

PROPOSED AMENDMENT/REVISION TO:

- 1. THE CODEX STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999) – INCLUSION OF CAMELLIA SEED OIL; MAHUA SEED OIL; SACHA INCHI OIL AND HIGH OLEIC ACID SOYA BEAN OIL**
- 2. THE CODEX STANDARD FOR FAT SPREADS AND BLENDED SPREADS (CXS 256-2007)**
- 3. THE CODEX STANDARD FOR FISH OILS (CXS 329-2017) – INCLUSION OF CALANUS OIL**

Comments at Step 3 (reply to CL 2021/36/OCS-FO and CL 2021/58/OCS-FO)

Comments of Australia, Brazil, Canada, Chile, Colombia, Cuba, Ecuador, Egypt, European Union, India, Indonesia, Iran, Iraq, Kenya, Malaysia, Panama, Peru, Saudi Arabia, Thailand, Uganda, USA, Fediol and GOED

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2021/36/OCS-FO issued in June 2021 (Annex I) and CL 2021/58/OCS-FO issued in July 2021 (Annex II). Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as Annexes I and II; and are presented in table format.

ANNEX I

Comments at Step 3 (reply to CL 2021/36/OCS-FO)

COMMENTS	MEMBER/ OBSERVER
Whether or not you support that process outlined in paragraph 3 (5 in the CL) above	
Australia has no comments concerning the document presented for comments.	Australia
Brazil agrees with the process outlined on CL 2021/58/OCS - FO to evaluate new work proposals.	Brazil
Canada supports the proposed process for evaluation of new work proposals outlined in paragraph 3 of the CL 2021/36/OCS-FO. Since the session will be held in a virtual environment, convening an in-session working group to discuss the merits of each proposal would be challenging and time-consuming. The proposed process will save time at the plenary session, since the assessment will be done outside of plenary. Member countries will still have an opportunity to evaluate the information provided ahead of the session and the sponsor/s of the new work could gather any additional information that may be identified by members as lacking in the proposal.	Canada
We agree.	Colombia
Cuba supports the process outlined in paragraph 5.	Cuba
Ecuador appreciates the work done by the Electronic Working Group and supports the process outlined in the paragraph.	Ecuador
Egypt supports the process outlined in paragraph 3 above.	Egypt
The European Union and its Member States (EUMS) support the process outlined in paragraph 3 of CL 2021/36/OCS-FO.	European Union
India supports proposed draft revision to the Standard for Camellia Seed Oil.	India
Indonesia supports the process outlined in paragraph 5 in order to facilitate an effective discussion at the CCFO session. We share the same concern as CCFO and Codex Secretariat that in-session working group during virtual meeting will not be feasible due to time limitations.	Indonesia
To have more satisfactory discussion on the topics, it would be very useful to have a virtual meeting at least with EWG members before the submitting the final documents to the members and also final approve. However but maybe some comments and points about explanation make in the session and it will be necessary consider them.	Iran
Malaysia supports the process outlined in paragraph 5 of CL 2021/36/OCS-FO.	Malaysia
Panama appreciates the work done, we agree with the proposed document, and we recommend its progress.	Panama
The Kingdom of Saudi Arabia agrees with the process outlined in paragraph 5. The Kingdom of Saudi Arabia support the five (5) proposals to undertake by new work of CCFO27.	Saudi Arabia
The United States supports the process outlined in paragraph 3 for the committee to evaluate the new work. The United States supports the process outlined in paragraph 3 for the committee to evaluate the new work. The United States supports committee approval of the following new work proposal, consistent with the Criteria for the Establishment of Work Priorities under the Codex Procedural Manual.	USA
GOED supports the process outlined in paragraph 3 above.	GOED
Whether or not you support CCFO27 to undertake new work as described in each of the five (5) proposals submitted in document CX/FO 21/27/8?	
Brazil supports the proposals of new work for the inclusion of Camellia seed oil, Mahua oil, Sacha inchi oil and high oleic soyabean oil. Moreover, Brazil supports the proposal of revision of the standard of fat spreads and blended spreads to discuss about products that are composed exclusively of vegetable fat or oil.	Brazil
Canada appreciates the work done by the various sponsors in developing the Discussion Papers and Project Documents below (Parts I to V). Canada has completed a review and assessment of the information provided in these documents and offers its comments and evaluation, with more details in the next section.	Canada

<p>Part I – Proposed amendment/revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – inclusion of Camellia seed oil</p> <p>Canada notes that the data provided on the volume of production, consumption and regional and international trade in this oil is limited and may not be sufficient to warrant its consideration as new work for CCFO at this time.</p> <p>Part II – Proposed amendment/revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – inclusion of Mahua seed oil</p> <p>Canada notes that there is no data provided on the volume of production, consumption and regional and international trade in this oil at the present time. While there may be potential for the use of this oil in the future, Canada does not support consideration of this new work proposal at this time.</p> <p>Part III – Proposed amendment/revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – inclusion of Sacha inchi oil</p> <p>Canada supports the consideration of this new work for CCFO27, noting that the discussion paper and project document have addressed the key criteria for new work in the procedural manual.</p> <p>Part IV – Proposed amendment/revision to the Codex Standard for Fat Spreads and Blended Spreads (CXS 256-2007)</p> <p>The Discussion Paper and Project Document would benefit from a circular letter to seek input from member countries, with specific questions posed to flush out what are the issues with the current standards, categories and names used, etc. This would then enable the development of a stronger and more informed discussion paper and project document before new work could be considered.</p> <p>Part V – Proposed amendment/revision to the Codex Standard for Fish Oils (CXS 329-2017) – inclusion of Calanus oil</p> <p>Canada notes that the discussion paper and project document have addressed the key criteria and supports this new work for CCFO.</p>	
We agree.	Colombia
Cuba supports the proposed new work.	Cuba
Ecuador appreciates the work done by the Electronic Working Group and supports CCFO27 to undertake new work as described in the proposals submitted in document CX/FO 21/27/8.	Ecuador
Egypt supports CCFO27 to undertake new work as described in each of the five (5) proposals submitted in document CX/FO 21/27/8	Egypt
Indonesia supports the Committee to undertake new work particularly on Proposed Amendment/Revision to the Standard for Fat Spreads and Blended Spreads (CXS 256-2007): Sections 2 (Description) and 3 (Essential composition and quality factors) as described in CX/FO 21/27/8 Part IV.	Indonesia
<p>Part I - Proposed Amendment/ Revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – Inclusion of Camellia Seed Oil:</p> <p>Malaysia is of the view that this proposal may be supported if the relevant data/information pertaining to the volume of global production and consumption, global trade volume, and essential composition and quality factors of Camellia seed oil from other countries are provided in the Project Document. A Discussion Paper is also to be submitted in accordance with the requirements set in paragraph 132 (ii) of REP19FO. Some of the criteria established by the 16th Session of the CCFO (1999) on specific information required when proposing the addition of new oils to the Standard for Named Vegetable Oils (CXS 210-1999) as agreed in paragraph 132(iii)(a) also were not fulfilled. For example, the level of international trade of Camellia seed oil (171 to 262 tons) is negligible compared to its production (700,000 tons).</p> <p>Part II - Proposed Amendment/ Revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – Inclusion of Mahua Oil:</p> <p>Malaysia is of the view that the proposal may be supported if relevant information is provided pertaining to volume of global production and consumption, and pattern of trade between countries is provided. Some of the criteria established by the 16th Session of the CCFO (1999) on specific information required when proposing the addition of new oils to the Standard for Named Vegetable Oils (CXS 210-1999) as agreed in paragraph 132(iii)(a) also were not fulfilled. For example, no data has been provided for level of international trade.</p>	Malaysia

<p>Part IV - Proposed Amendment/ Revision to the Codex Standard for Fat Spreads and Blended Spreads (CXS 256-2007):</p> <p>The proposal to amend/revise the Standard for Fat Spreads and Blended Spreads CXS 256-2007 is not supported as the existing standard already adequately protects the consumer and facilitates trade. The replacement of the term “margarine” with “Plant butter” would cause the former term to disappear in the future. The use of the term “Plant butter” may also have legal implications in some countries.</p> <p>Part V - Proposed Amendment/ Revision to the Codex Standard for Fish Oils (CXS 329-2017) – Inclusion of Calanus Oil: Malaysia is of the view that this proposal may be supported if the relevant data, including trade volume and consumption data to prove that there is substantial trade between countries, and sufficient essential composition data is provided. Some of the criteria established by the 16th Session of the CCFO (1999) on specific information required when proposing the addition of new oils to the Standard for Named Vegetable Oils (CXS 210-1999) as agreed in paragraph 132(iii)(a) also were not fulfilled. For example, insufficient data has been provided for level of international trade.</p>	
<p>The United States supports the committee to approve the following new work proposals since they have appropriately met the Criteria for the Establishment of Work Priorities under the Codex Procedural Manual.</p> <p>Amendment/revision to the Standard for Named Vegetable Oils (CXS 210-1999) to include camellia seed oil – submitted by the People’s Republic of China (Part I)</p> <p>The United States supports the proposal for new work to amend/revise the Codex Standard for Named Vegetable Oils (CXS 210-1999) to include camellia seed oil, submitted by the People’s Republic of China. While the current volume of trade for camelia seed oil is still limited (estimated at 338 tons in 2020), the proposal highlights growing demand for this oil due to its unique functional attributes and sufficiently addresses the need for an internationally harmonized standard to protect consumers and ensure fair trade.</p> <p>Amendment/revision to the Standard for Named Vegetable Oils (CXS 210-1999) to include mahua seed oil – submitted by India (Part II)</p> <p>The United States supports the proposal for new work to amend/revise the Codex Standard for Named Vegetable Oils (CXS 210-1999) to include Mahua Oil, submitted by India. The development of a standard for mahua oil may enhance consumer protection and international harmonization by preventing the proliferation of divergent private standards.</p> <p>Amendment/revision to the Standard for Named Vegetable Oils (CXS 210-1999) - To include sacha inchi oil - submitted by Peru (Part III)</p> <p>The United States supports the proposal for new work to amend/revise the Codex Standard for Named Vegetable Oils (CXS 210-1999) to include sacha inchi oil, submitted by Peru. This proposal highlights the growing demand for sachi inchi oil. The United States supports new work to encourage fair trade and discourage deceptive practices.</p> <p>Amendment/revision to the Standard for Fat Spreads and Blended Spreads (CXS 256-2007) – submitted by the European Margarine Association (IMACE) (Part IV)</p> <p>The United States supports the proposal to revise the Standard for Fat Spreads and Blended Spreads (SCS 256-2007). The standard has not been revised for many years and the characteristics of products in this category have changed over time due to changes in dietary preferences. Therefore, the United States supports that CCFO undertake work to update the standard to define more accurately and fairly the characteristics of products currently traded in this category. The United States believes the proposal needs a member to sponsor it before proceeding.</p>	<p>USA</p>
<p>GOED supports CCFO27 to undertake the new work described in document CX/FO 21/27/8 Part V - Proposed Amendment/Revision to the Codex Standard for Fish Oils (CXS 329-2017) - Inclusion of Calanus Oil</p>	<p>GOED</p>
<p>Provide comments or observations on the various aspects of each project document in line with the Codex Procedural Manual Page 43-47 (criteria for the establishment of work priorities). (see below the relevant documents)</p>	
<p>Brazil has no specific comments regarding the Project Documents presented and the provisions of Codex Procedural Manual.</p>	<p>Brazil</p>
<p>Part I - Proposed amendment/revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – inclusion of Camellia seed oil</p> <p>Canada appreciates the work done by the delegation of the People’s Republic of China to develop the Project Document on this new work proposal (CX/FO 21/27/8 Part I). Based on the information provided in this document, it appears that this oil, which has a similar fatty</p>	<p>Canada</p>

acid profile to olive oil, may have a lot of potential. However, the data presented indicates that the volume of production, consumption, and international trade in this oil is still limited. This includes data for only the last three years (2018-2020), with no breakdown of the volume of trade for the various countries mentioned to show an upward trend in the global trade of this oil. More evidence of international or regional market potential would be useful for consideration.

Canada would like to see more evidence to support new work to include this oil in the Codex Standard CXS 210-1999. More information on the production of camellia seed oil e.g. areas/countries where this is produced, volume/ hectare, consumption as food, regional and international trade, etc. would be helpful. Forecasts in terms of potential increased production (e.g. increased area/ number of farms, production facilities etc.) would also be useful information to demonstrate the importance of this oil in the countries' economies. In addition to data on global trade (volume and value), it would be important to demonstrate evidence of diversification of national legislations in trading countries and actual or potential trade impediments, if any. Demonstration of actual or potential trade and consumer protection issues, including fraudulent practices reported, could support the need for international or regional standardization.

Part II – Proposed amendment/revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – inclusion of Mahua seed oil

Canada appreciates the work done by the delegation of the India to develop the Discussion Paper and Project Document on this new work proposal (CX/FO 21/27/8 Part II). Mahua oil appears to have a lot of potential as a possible alternative ingredient to cocoa butter. However, the document has not provided data to substantiate that there is sufficient production, consumption as food, and regional and international trade in this vegetable oil/fat, and the current and potential future demand for its use.

Canada believes that while there is very good potential for the use of the mahua seed oil, any new work to consider its inclusion in the Codex Standard for Named Vegetable Oils (CXS 210-1999), may not be warranted at this time.

Part III – Proposed amendment/revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – inclusion of Sacha inchi oil

Canada appreciates the work done by the delegation of Peru in developing the Discussion Paper and Project Document on this new work proposal (CX/FO 21/27/8 Part III). The document has provided adequate data on the key criteria for consideration of this oil as new work in CCFO27. This includes the essential characteristics of this oil, adequate volume of production and consumption in various countries, and volume and value in international trade. Canada supports CCFO27 to undertake new work to include Sacha inchi oil in the Codex Standard for Named Vegetable Oils (CXS 210-1999)

Part IV – Proposed amendment/revision to the Codex Standard for Fat Spreads and Blended Spreads (CXS 256-2007)

Canada appreciates the work done by the European Margarine Association (IMAGE) in developing the Discussion Paper and Project Document on this new work proposal (CX/FO 21/27/8 Part IV). While it is recognized that certain aspects of the current standard CXS 256-2007 appears outdated, more work needs to be done to flush out the issues based on the experiences of member countries. The discussion paper is a bit "weak" in that it provides the organization's rationale for the new work, but it seems it is not reflective of any circular letter seeking members' input on this specific topic, what are the issues with the current standards and names, etc. This document would benefit from a circular letter with specific questions posed to members that would then enable the development of a stronger and more informed discussion paper and project document before new work could be considered.

The above is particularly the case with respect to some of the potentially more controversial proposals such as the category "plant butter" to replace margarine. As margarine is a currently established common name in many countries, the discussion paper should really flush out the pros and cons on this proposal, take into consideration whether there is really a problem with the existing common name, as well as consider that dairy terms have provisions in CCMMP. The term "butter" may also confuse given the discussion paper's comments on lactose intolerance as a driver for this work. Hence, member countries may need to consider input not just from the fats and oils industry stakeholders, but also dairy stakeholders.

In terms of the specific proposals, Canada has the following comments:

Canada supports aligning the definition for Fats Spreads and Blended Spreads with the definition for Dairy Fat Spreads. There are concerns however with regards to some of the proposed classification and common names. For example, "Blended Spread" may not be meaningful to consumers in some countries, and would need to be more specifically

<p>described on the label. The common name “plant spread” in 3.1.1 would be more meaningful if it was “(naming the plant(s)) spread”. In 3.1.2 the common name “blended spread” would be more meaningful if the edible oils blended were included in the common name, such as “(naming the fat(s)) blended spread” or “(naming the fat spread(s)) blended spread” or “Blended (naming the fat spreads)”. At a minimum, “blended fat spread” would be more meaningful. There should be consideration to permit countries to continue to use “margarine” as an alternative or required common name if that is how the product is commonly known within their country.</p> <p>There are questions whether Calorie-reduced terms could be used as well, for example, “Calorie-Reduced Margarine” is a standardized food in Canada. Further, if Low- and Reduced-fat (and calorie-reduced) terms may be used, and applied to either plant butters or plant spreads, there could be a potential for confusion in the naming of the resulting products.</p> <p>Part V – Proposed amendment/revision to the Codex Standard for Fish Oils (CXS 329-2017) – inclusion of Calanus oil</p> <p>Canada appreciates the work done by the delegation of Norway in developing the Discussion Paper and Project Document on this new work proposal (CX/FO 21/27/8 Part V). The information provided in these documents generally demonstrated the need to elaborate a standard for the calanus oil derived from the crustacean <i>Calanus finmarchicus</i>, a marine zooplankton. Since the oil’s basic characteristic, being primarily wax esters, is different from the other fish oils in the standard CXS 329-2017, which are composed mostly of triglycerides, calanus oil could not be accommodated in the broad classification of (unnamed) fish oils.</p> <p>While the volume of production of this oil is currently limited, with slight projection based on the annual commercial harvesting quotas for the raw material, <i>Calanus finmarchicus</i>, the price of the oil compared to other fish oils appears very high, based on data provided on annual product and value in 2018. Increasing demand is also projected based on exports to various countries. However, there was no data on how much was actually exported to the various countries mentioned. It would be helpful if more information could be provided in this area. In spite of this, it is recognized that having an international standard that could be used by importing countries to assess the purity of products they receive would be important to ensure fair trade.</p> <p>Based on the information provided, Canada supports this new work to be undertaken by CCFO.</p>	
Cuba has no comments on the projects.	Cuba
We have no further comments.	Ecuador
Egypt agrees with the project documents in view of Codex Procedural Manual Page 43-47 (criteria for the establishment of work priorities).	Egypt
<p>Part III (Sacha inchi oil):</p> <p>All data in tables (fatty acids, chemical and physical characteristics, sterols and tocopherols) should be completed and given in the same format as for other oils in CSX 210-1999.</p>	European Union
<p>Indonesia is of the view that the Description of fat spreads and blended spreads needs to be revised. The current Description contained the term “plastic” which gave a negative perception to consumer and potentially create a trade problem due to misleading information. It is consistent with the General Criterion for Criteria applicable to commodities and point e) Coverage of the main consumer protection and trade issues by existing or proposed general standards, in the criteria for the establishment of work priorities. The proposal to revise Description might impact to other Section of the Standard, for example composition and name of the products, that needs to be carefully considered, taking into account diversification of national legislations.</p>	Indonesia
Agree	Iraq
Comments and observations in response to CL 2021/36/OCS-FO are as below (at relevant document)	Malaysia
<p>As described in Norway’s discussion document, compared to unnamed fish oils, calanus oil is unique given that it is a wax ester rich omega-3 oil. For this reason, calanus oil should be included as a named fish oil in the Standard for Fish Oils (CXS 329-2017) in order to avoid any impediments to international trade. Furthermore, GOED believes calanus oil is amenable to standardization as outlined by Norway.</p>	GOED
PROPOSED AMENDMENT/REVISION OF THE STANDARD FOR NAMED VEGETABLE OILS (CXS 210-	

1999), - PART 1- INCLUSION OF CAMELLIA SEED OIL	
<p>The first sentence of section 2 (Relevance and timeliness) of the project document should be deleted as it suggests that camellia oil may be marketed as a substitute to olive oil. Data on composition (sterols and tocopherols) should be completed.</p> <p>With its extremely similar fatty acid profiles and physicochemical properties to those of olive oil, camellia seed oil is therefore honored as the “oriental olive oil” and “the king of cooking oil”. It is rich in oleic acid (68–87%). Meanwhile, camellia seed oil also contains a multitude of natural antioxidants, such as squalene, phytosterol (β-sitosterol, campesterol and stigmaterol), polyphenols, fat-soluble vitamins (Vitamins A, B, E), sasanquasaponin, and other functional substances. These components with various biological activities are useful for lowering triglycerides and cholesterol, thus preventing hypertension, heart disease, arteriosclerosis, and other diseases. Also, it could be used as a base oil for high-level skin care oil through further intensive processing.</p>	European Union
<p>For vegetable oils such as Camellia and Mahua oils are considerable as new source origin edible oil and fat it would be suitable to present toxicological tests or similar documents if exists to ensure its suitability to be consumed. (CXS 210-1999)</p>	Iran
<p>General Comment:Kenya supports the proposal to included Camellia as proposed by the project document by the People’s Republic of China</p> <p>Rationale: We have confirmed that the project document is developed in full compliance with the procedural manual.</p>	Kenya
<p>(a) Volume of production and consumption in individual countries and volume and pattern of trade between countries.</p> <p>Volume of production in China is given as 700,000 tons per annum. No data is provided for production in other countries and</p> <p>Volume of consumption in other countries is not provided.</p> <p>Export in 2018 and 2019 are given as 171 tons and 262 tons, respectively. However, the quantity exported seems negligible when compared to the total production, though the Discussion Paper mentions of export to more than 15 countries.</p> <p>(b) Diversification of national legislation and apparent resultant or potential impediments to international trade</p> <p>No evidence has been provided on potential impediments to international trade. Nonetheless, quantities traded currently seem to be rather small.</p> <p>(c) International or regional market potential</p> <p>Though international market potential exists as there are 15 countries importing camellia seed oil, quantities traded seem to be rather small compared to production volume.</p> <p>(d) Amenability of the commodity to standardisation</p> <p>According to Project Document, the voluntary National Standard for Camellia seed oil (GB/T 11765) in China was first published in 2003 and revised in 2018. This suggests the commodity can be standardised. This point has also been addressed in the purpose and scope of the amendment.</p> <p>(d) Coverage of the main consumer protection and trade issues by existing or proposed general standards</p> <p>Though attempt has been made to address this point in the Project Document, as volume of international trade is rather small, it is not clear how the standard would address this.</p>	Malaysia
<p>Panama appreciates the work done, we agree with the proposed document, and we recommend its progress.</p>	Panama
<p>Uganda supports the project document for new work items as proposed in 7.1 (proposed amendment/revision to the codex standard for named vegetable oils (CXS 210-1999), - inclusion of camellia seed oil</p>	Uganda
PROPOSED AMENDMENT/REVISION OF THE STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999), - PART II - MAHUA OIL	
<p>Mahua oil is not defined as other named vegetable oils, but the name is used for several oils of different botanical origin. This approach has to be clarified in the definition and has to be agreed on by all Codex Members (Indian illipe butter versus Malaysian illipe butter). Data on composition (fatty acids, sterols and tocopherols) as well as data on chemical and physical characteristics should be completed and given in the same format as for other oils in CSX 210-1999. For example, ranges should be given for the individual and total sterols and for tocopherols - not single values or only upper limits. Trans fatty acid isomers will occur in</p>	European Union

refined oils so they are not mentioned in the table for fatty acid composition. As a natural product it should show a range of compositional variation.	
For vegetable oils such as Camellia and Mahua oils are considerable as new source origin edible oil and fat it would be suitable to present toxicological tests or similar documents if exists to ensure its suitability to be consumed. (CXS 210-1999)	Iran
For Fat Spreads and Blended Spreads (CXS 256- 2007) we need to a maximum limit for milk fat in blended spread that might be 30 % due to economic and rheological issue and the important point is differentiation these origin to each other. As you know, it is not as much as easy to detect amount less than 20 percent milk fat in blended fat by international standard method and then regarding to value difference between two sources, evaluation of claim on label and price make some challenges.	Iran
<p>General Comment: Kenya proposes that project document be improved to be in compliant to procedural manual before being submitted to CAC for consideration. Rationale: The project paper was not clear on the following aspects: Volume of production consumption in individual countries and volume and pattern of trade between countries – The project document did not all provide the required information as required by this procedural provision especially in regard consumption and pattern of trade to enable Kenya make informed decision of this proposal. Reference to the source of data provide is not clear.</p> <p>International or regional market potential – The project paper has not provided information related to internal market potential.</p>	Kenya
<p>Volume of production and consumption in individual countries and volume and pattern of trade between countries.</p> <p>Volume of production in India is given as 20,000 – 25,000 tonnes per annum. No data is provided for production in other countries.</p> <p>No data has been provided for consumption, trade or pattern of trade has been provided.</p> <p>Diversification of national legislations and apparent resultant or potential impediments to international trade.</p> <p>As no trade data has been provided, it is not possible to evaluate potential impediments of international trade if the commodity is not included into CXS 210-1999.</p> <p>International or regional market potential</p> <p>No data has been provided to indicate the international or regional market potential of Mahua oil.</p> <p>Amenability of the commodity to standardization.</p> <p>Project Document mentions that the standards for Mahua oil have been prescribed under Food Safety and Standards Regulation (Food Products Standards and Food Additives) Regulation, 2011.</p> <p>Coverage of the main consumer protection and trade issues by existing or proposed general standards.</p> <p>The Project Document mentions that the development of a Codex for Mahua oil would 'enhance consumer protection by discouraging deceptive practices'.</p> <p>Number of commodities, which would need separate standards indicating whether raw, semi-processed or processed.</p> <p>According to Project Document, this pertains to the product mentioned (Mahua oil).</p> <p>Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies).</p> <p>Information given in the Project Document is not specific to Mahua oil and only refers to general standards</p>	Malaysia
Panama appreciates the work done, we agree with the proposed document, and we recommend its progress.	Panama
<p>Uganda does not support submission of proposal contained in 7.2 (proposed amendment/revision to the codex standard for named vegetable oils (CXS 210-1999), - inclusion of Mahua oil).</p> <p>In all these cases, the basis of support is on the requirements of the procedural manual but not on the proposed specific values as this will be considered and discussed in step 3, if CAC agrees and adopts the new work.</p> <p>Justification</p> <p>The reservation of 7.2 is because the project paper was not clear on the Volume of production</p>	Uganda

<p>consumption in individual countries, volume and pattern of trade between countries. In addition, the project document did not all provide the required information as required by this procedural provision especially in regard consumption and pattern of trade to enable Uganda make informed decision of this proposal. Reference to the source of data provide is not clear. Further, the project paper has not provided information related to International or regional market potential.</p>	
<p>PROPOSED AMENDMENT/REVISION OF THE STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999), - PART III (SACHA INCHI OIL)</p>	
<p>1. Chile supports discussing the comments on new work proposals during the plenary session.</p> <p>2. Chile supports the 27th plenary session to undertake the new work outlined for the following:</p> <p>New work proposal for the amendment/revision to the Standard for named vegetable oils (CXS 210-1999) to include camellia seed oil. – Comments: It has been observed that the production of seeds, their oil and their trade has grown steadily.</p> <p>New work proposal for the amendment/revision to the Standard for named vegetable oils (CXS 210-1999) to include Mahua oil. – Comments: It has been noted that its production is not very significant, but since it does have special characteristics, it provides alternatives to other oils, as a substitute of palm oil and cocoa butter.</p> <p>New work proposal for the amendment/revision to the Standard for fat spreads and blended spreads (CXS 256-2007): Sections 2 (Description) and 3 (Essential composition and quality factors). – Comments: Due the industry's technological development, some products exist today that are not currently included in the Codex Standard for fat spreads and blended spreads (CXS 256-2007), which therefore needs to be updated.</p> <p>Chile does not support the 27th plenary session to undertake the new work outlined for the following:</p> <p>New work proposal for the amendment/revision to the Standard for fish oils (CXS 329-2017) to include calanus oil. – Comments: This oil is produced in small quantities and does not seem to meet the mandatory requirements for the inclusion of new work. In addition, these organisms are vitally important for trophic networks, since they have a key role in the Arctic sea water food web and their harvesting could damage the marine ecosystem.</p> <p>Chile has no comments about the New work proposal for the amendment/revision to the Standard for named vegetable oils (CXS 210-1999) to include sacha inchi oil. –</p>	<p>Chile</p>
<p>Cuba supports including sacha inchi oil in the revision to the Standard for named vegetable oils CXS 210-1999.</p>	<p>Cuba</p>
<p>Egypt agrees with the project document in view of Codex Procedural Manual Page 43-47 (criteria for the establishment of work priorities)</p>	<p>Egypt</p>
<p>Part III (Sacha inchi oil):</p> <p>All data in tables (fatty acids, chemical and physical characteristics, sterols and tocopherols) should be completed and given in the same format as for other oils in CSX 210-1999.</p>	<p>European Union</p>
<p>We support CCFO27 to undertake new work to include Sacha inchi oil in the Codex Standard for Named Vegetable Oils (CXS 210-1999)</p>	<p>Iraq</p>
<p>Malaysia is of the view that the proposal may be supported if relevant information is provided pertaining to volume of global production and consumption, and pattern of trade between countries is provided.</p> <p>Some of the criteria established by the 16th Session of the CCFO (1999) on specific information required when proposing the addition of new oils to the Standard for Named Vegetable Oils (CXS 210-1999) as agreed in paragraph 132(iii)(a) also were not fulfilled. For example, the data provided on volume of production is very limited. Data has been provided on volume of international trade. However, the data is limited to Peru's exports and no data is provided on actual global trade of sacha inchi oil.</p> <p>4.1 <i>Volume of production and consumption in individual countries and pattern of trade between countries:</i></p> <p>Although the hectarage information in several producer countries is provided in the Project Document, data provided on volume of production is very limited. Only volume of production in Ecuador is provided, and that too is merely about 2846 tons. Even volume of production in Peru was not provided.</p> <p>4.2 <i>Diversification of national legislation and apparent resultant or potential impediments to international trade</i></p> <p>This point is moderately addressed in the Project Document.</p>	<p>Malaysia</p>

<p>4.3 <i>International or regional market potential</i> Not possible to evaluate the market potential as insufficient data has been provided to support the statement made in the Project Document. The regional market potential remains unclear.</p> <p>4.4 <i>Amenability of the commodity to standardisation</i> According to Project Document, the commodity can be standardised.</p>	
Panama appreciates the work done and recommends the advancement of the document.	Panama
<p>With regard to the request for comments, we would like to provide the following replies to point 6 in CL 2021/36/OCS-FO:</p> <p>i) Whether or not you support that process outlined in paragraph 5 above. ANSWER: We agree with point 5 of CL 2021/36/OCS-FO.</p> <p>ii) Whether or not you support CCFO27 to undertake new work as described in each of the five (5) proposals submitted in document CX/FO 21/27/8 (Part I, II, III, IV and V). ANSWER: We support CCFO27 to undertake new work as described in the proposal submitted in document CX/FO 21/27/8 (Part III).</p> <p>iii) Provide comments or observations on the various aspects of each project document in line with the Codex Procedural Manual Page 43-47 (criteria for the establishment of work priorities). Each project document has been uploaded to the Codex Online Commenting System (OCS): https://ocs.codexalimentarius.org/, as per the guidance below. ANSWER: We have no comments about the projects.</p>	Peru
In principle, Thailand has no objection with the proposal to amend Codex Standard for Named Vegetables Oil to include Sacha Inchi Oil.	Thailand
PART IV - PROPOSED AMENDMENT/REVISION TO THE STANDARD FOR FAT SPREADS AND BLENDED SPREADS (CXS 256-2007): SECTIONS 2 (DESCRIPTION) AND 3 (ESSENTIAL COMPOSITION AND QUALITY FACTORS)	
<p>Section 2 (Description) of the Standard for fat spreads and blended spreads (CXS 256-2007). 2. Description 2.1 Plant Spreads and Blended Spreads. The products covered by this standard are foods that are a spreadable emulsion principally of the type water-in-edible fats and oils. The proposal to amend the term "plastic" is considered relevant and we support its modification. Keep the current Codex definitions in CXS 256-2007.</p> <p>Section 3 (Essential composition and quality factors) of the Standard for fat spreads and blended spreads (CXS 256-2007). 3. Essential Composition and Quality Factors 3.1 Composition 3.1.1. Plant Spreads 3.1.1.1 These products contain between 50-80% fat which all is derived from plant sources. No animal (including dairy) fats may be used. (a) Plant butter - total fat 80-90% (b) Plant spread - total fat 50-80% 3.1.2 Blended Spreads 3.1.2.1 These products contain between 50-80% fat, of which, some from animal (including dairy) origin. (a) Blended Spread - total fat up to 80% - (animal fat 3-50%, including dairy) Keep the current Codex definitions in CXS 256-2007.</p> <p>The amendments suggested in Plant Spreads directly exclude the use of dairy fat, which increases production costs for those countries that do not produce plant-fat. In addition, this would require consumer education, which takes a long time and is expensive for the industry. This is worsened by problems affecting the sale of Colombian products.</p> <p>In line with the meetings held, we do not agree with creating a category for plant spreads, because such category would be included in the classification as a spread. Likewise,</p>	Colombia

<p>Resolution 2154 does not contain the term “plant butter”, which is the rationale being used to include a specific standard for plant spreads.</p> <p>The definitions in Resolution 2154 of 2012 include margarines and table and cooking spreads (“<i>margarinas y esparcibles de mesa y cocina</i>”), defined as products with a soft consistency made of an emulsion of edible oils and/or fats of plant or animal origin (milk or milk and marine derivatives). Many margarines in the industry contain milk, or milk whey, which is a derivative. We consider this classification as appropriate.</p>	
<p>The EUMS oppose replacing the well-established term “fat spread” with the term “plant spread”.</p> <p>A product containing only plant-fat, with a total fat content of less than 80% shall be a <i>Plant Spread (previously ‘Fat Spread’)</i></p> <p>The EUMS also oppose renaming “margarine” as “plant butter” as this would mislead the consumer and go against General Standard for the Use of Dairy Terms (CXS 206-1999).</p> <p>A product containing only plant-fat, with a total fat content of 80-90% shall be a <i>Plant Butter (previously Margarine)</i></p>	European Union
<p>India supports the new work proposal, with disagreement on the inclusion of term plant butter.</p> <p>Plant spread - total fat 50-80%</p> <p>The maximum limit of fat percentage in plant spread/ plant fat may be omitted and keep the minimum percentage only.</p> <p>Because the food business operators in India are producing plant spread having total fat upto 90%.</p>	India
<p>Kenya supports the revision of the standard as proposed and notes that the project document is in compliance to the procedural manual. However, the project document proposes names of the products that in our view should be introduced for comment at step 3. As a result, we propose that the clause on main aspect to be covered be revised such that it capture roman i & ii of the project documents and expunge the specific names as proposed.</p> <p>The proposed names as presented appears as concluded names of the products which if adopted with project document in CAC44 may not provide a room for discussing the names of the products. We therefore recommend that these names be discussed at step 3.</p>	Kenya
<p>General Criterion</p> <p>Ensuring fair practices in food trade and needs of developing countries are not adequately fulfilled by the proposed amendment to the standard (CXS-256-2007).</p> <p>a) Volume of production and consumption in individual countries, and volume and pattern of trade between countries</p> <p>Based on the data provided, there is significant trade in fats and blended spreads. However, it is not clear if the data will be similar for ‘plant butter’, ‘plant spread’ or ‘blended spread’.</p> <p>b) Diversification of national legislations and apparent resultant or potential impediments to international trade</p> <p>Based on available trade data, there is no evidence for impediment to international trade of the product due to the existing standard CXS 256-2007.</p> <p>c) International or regional market potential</p> <p>No evidence has been provided to support the suggestion in the Project Document that the proposed revision would enhance international trade in the product, or its raw materials.</p> <p>d) Amenability of the commodity to standardization</p> <p>The commodity has already been standardised as per the existing standard CXS 256-2007.</p> <p>e) Coverage of the main consumer protection and trade issues by existing or proposed general standards</p> <p>The existing standard CXS 256-2007 already adequately protects the consumer and facilitates trade. The proposed amendments do not add any additional coverage. The proposed use of the term ‘plant butter’ is probably inconsistent with or against national legislations in several countries.</p> <p>f) Work already undertaken by other international organizations in this field</p> <p>No such work is necessary as the current CXS 256-2007 is sufficient.</p>	Malaysia
<p>Panama appreciates the work done, we agree with the proposed document, and we recommend its progress.</p>	Panama
<p>Thailand has no objection on adding Plant Spreads in CXS 256-2007. However, current CXS 256-2007 allows the use of any milk fat content of no more than 3% of the total fat content in</p>	Thailand

sub- section 3.1.1.1. Therefore, Thailand would like to seek clarification on the missing range of the lower value 0-3% of milk fat content.	
Uganda supports the project document for new work items as proposed in proposed amendment/revision to the standard for fat spreads and blended spreads (CXS 256-2007): sections 2 (description) and 3 (essential composition and quality factors)	Uganda
PART V - PROPOSED AMENDMENT /REVISION TO THE CODEX STANDARD FOR FISH OILS	
India supports the new work proposal in the amendment or revision to the standard for fish oil.	India
For fish oils, Iran has no comments and is not opposed	Iran
General Comment: Kenya supports the proposal to included Calanus oil as proposed by the project document by Norway Rationale: We have confirmed that the project document is developed in full compliance with the procedural manual.	Kenya
Volume and production and value of trade Volume of production of Calanus oil is given as 17 tonnes (value USD 5 million); compared to total of 90,049 tonnes (value USD 1074) of fish oil produced in 2018. Volume of production in 2019 is given as 25 tonnes. Annual commercial harvesting quota determines production volumes. The high value of calanus oil compared to many other fish oils is highlighted. Consumption and trade data not provided. International or regional market potential No data has been provided to indicate the international or regional market potential of Calanus oil.	Malaysia
Panama appreciates the work done, we agree with the proposed document, and we recommend its progress.	Panama
Uganda supports the project document for new work items as proposed in proposed amendment/revision to the codex standard for fish oils (CXS 329-2017) – inclusion of Calanus oil	Uganda

ANNEX II

**PART VI - AMENDMENT/REVISION TO THE STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999)
– INCLUSION OF HIGH OLEIC ACID SOYA BEAN OIL**

Comments at Step 3, (in reply to CL 2019/58-FO)

COMMENT	MEMBER/ OBSERVER
Australia has no comments concerning the document presented for comments.	Australia
Chile has no comments about the new work proposal for the amendment/revision to the Standard for named vegetable oils (CXS 210-1999) to include high oleic acid soya bean oil.	Chile
Agree	Iraq
Kenya supports the proposal to amendment/revision CXS 210-1999 as proposed in the project document by United States of America Rationale: We have confirmed that the project document is developed in full compliance with the procedural manual	Kenya
Peru states no position about circular letter CL 2021/58/OCS-FO Proposed amendment/revision to the Codex Standard, for named vegetable oils (CXS 210-1999) to include high oleic acid soya bean oil, because this product is not manufactured in our country.	Peru
i. Whether or not you support that process outlined in paragraph 5 of CL 2021/36/OCS - FO?	
Canada supports the proposed process for evaluation of new work proposals outlined in paragraph 3 of the CL 2021/36/OCS-FO. Since the session will be held in a virtual environment, convening an in-session working group to discuss the merits of each proposal would be challenging and time-consuming. The proposed process will save time at the plenary session, since the assessment will be done outside of plenary. Member countries will still have an opportunity to evaluate the information provided ahead of the session and the sponsor/s of the new work could gather any additional information that may be identified by members as lacking in the proposal.	Canada
Colombia agrees.	Colombia
Cuba appreciates the opportunity to reply to CL 2021/58/OCS-FO and, in principle, supports the process outlined in paragraph 5 of circular letter CL 2021/36/OCS - FO. We also support CCFO27 to undertake the inclusion of high oleic acid soya bean oil as new work.	Cuba
Egypt supports that process outlined in paragraph 5 of CL 2021/36/OCS - FO	Egypt
India supports the new work proposal, amendment/revision to the codex standard, for named vegetable oils (CXS 210-1999), - inclusion of high oleic acid soya bean oil. CX/FO 21/27/8	India
To have a more satisfactory discussion on the topics, it would be very useful to have a virtual meeting at least with EWG members before submitting the final documents to the members and also final approval. However, but maybe some comments and points about explanation make in the session and it will be necessary to consider them.	Iran
Malaysia supports the process outlined in paragraph 5 of CL 2021/58/OCS-FO	Malaysia
Panama supports the process described in paragraph 5 of CL 2021/36 / OCS – FO	Panama
The Kingdom of Saudi Arabia support the agenda of the Committee session for new work, as suggested in recommendation.	Saudi Arabia
Against the Covid19 pandemic background and the impossibility to hold a physical in-session working group meeting during the CCFO27 week, FEDIOL supports the process for consideration of new proposals as described under point 5 of CL2021/36/OCS-FO so to proceed with a virtual screening, collection of comments and elaboration of a report to be presented to the plenary by the CCFO secretariat.	Fediol
ii. Whether or not you support CCFO27 to undertake new work as described in the proposal for inclusion of high oleic acid soya bean oil proposals submitted in document CX/FO 21/27/8 Part VI?	

Canada appreciates the work done by the delegation of the United States of America (USA) in developing the Project Document on this new work proposal. It is acknowledged that there is great potential for this oil, noting its functional characteristics, stability, and nutritional benefits in terms of a reduction in the amount of trans fats in foods. However, while there appears to be an increase in the actual volume of production of this oil in the USA, the actual volume in international trade remained low at only 300 metric tons in 2020 (note that it was reported at 230 MT in 2012). This may not be enough to warrant its inclusion in the Codex Standard CXS 210-1999 at this time, unless the sponsor provides a strong justification, acceptable to the Committee, for reconsideration of the criteria on volume in international trade of this oil.	Canada
Colombia agrees.	Colombia
Egypt supports CCFO27 to undertake new work as described in each of the five (5) proposals submitted in document CX/FO 21/27/8	Egypt
<p>Malaysia is of the view that this proposal may only be supported pending submission of the Discussion Paper, relevant data on trade between countries - intra and inter regional, relevant data on essential composition and quality factors as well as evidence for apparent resultant and possible impediments to international trade in the absence of a standard for high oleic acid soyabean oil.</p> <p>Some of the criteria established by the 16th Session of the CCFO (1999) on specific information required when proposing the addition of new oils to the Standard for Named Vegetable Oils (CXS 210-1999) as agreed in paragraph 132(iii)(a) also were not fulfilled. For example, the current level of international trade of high oleic acid soya bean oil is less than 1% of its production. Hence, amount traded is negligible compared to its production.</p>	Malaysia
Panama does support CCFO27 to undertake new work as described in the proposal for the inclusion of proposals for soybean oil with high oleic acid content presented in document CX / FO 21/27/8 Part VI	Panama
The Kingdom of Saudi Arabia support the inclusion of high oleic acid soya bean oil proposals to undertake by new work of CCFO27	Saudi Arabia
FEDIOL, representing the EU vegetable oil and proteinmeal industry, supports the proposal for inclusion of high oleic acid soya bean oil in CXS 210-1999 as submitted by the United States of America for consideration at the CCFO27.	Fediol
<p>iii. Provide comments or observations on the various aspects of the project document in line with the Codex Procedural Manual Page 43-47 (criteria for the establishment of work priorities). Each project document has been uploaded to the Codex Online Commenting System (OCS): https://ocs.codexalimentarius.org/, as per the guidance below.</p>	
<p>Canada appreciates the work done by the delegation of the United States of America in developing the Project Document on this new work proposal (CX/FO 21/27/8 Part VI). The document identified the benefits of High Oleic Acid Soya Bean Oil (HOSBO), considering its heat stability and nutritional benefits, particularly in terms of lowering the amounts of trans fats in foods. It is anticipated that this oil could replace a huge proportion of soybean oil in the market in the future.</p> <p>It is noted that this work proposal has been introduced in previous sessions of the CCFO, notably at CCFO 22 (in 2011, see REP11/FO) and CCFO23 (in 2013, see REP13/FO). Reports of the discussions indicated that the Committee at those times concluded that the volume of production and international trade was not high enough to warrant consideration as new work.</p> <p>Comparing the volumes of production and international trade in the project documents in 2013 and 2021 (see below) it is clear that the production of this oil has considerably increased in nearly a decade. However, the volume in international trade has remained low (230 MT in 2012 and 300 MT in 2020).</p> <p>In comparison, a review of the volume in international trade for High Oleic Safflower Oil reported by the delegation from Japan in 1999, when this oil was considered for inclusion in CXS 210-1999 (see CL00/25) indicated 32,000 Tons, which was 90% of total volume produced at that time. There were no data on trade volumes from the delegation from France who sponsored the inclusion of High Oleic Sunflower Oil in the same report.</p> <p>Canada would be interested to know the reasons for the low volumes in international trade for High Oleic Soybean Oil, to understand whether there might be some consideration that could</p>	Canada

<p>be sought for this criteria for new work proposals. We would also be interested to know the countries that trade in this oil, how much volume is traded, including how it is named, and any impediments to the trade of this oil.</p> <p>Comparison of the data reported in 2013 and 2021:</p> <p>(a) – area planted in hectares (b) – oil production in metric tons (c) – international trade in metric tons</p> <p>CCFO23 (2013) (REP13/FO): 2011: (a) <10,000; (b) 5,550; (c) None. 2012: (a) 40,485; (b) 21,963; (c) 230. Forecast for 2017: (a) 1,900,000; (b) 1,032,260; (c) 31,300</p> <p>CCFO27 (2021) (CL 2021/58/OCS-FO): 2020: (a) 141,643; (b) 93,375 (\$83 Million USD); (c) 300. Forecast/anticipated: (a) 728,450, in 2023; (b) 160,073 in 2021; (c) 1000 in 2021.</p>	
Colombia has no comments.	Colombia
Egypt agrees with the project document in view of Codex Procedural Manual Page 43-47 (criteria for the establishment of work priorities).	Egypt
For soybean oil with high oleic acid, there is a need to include a discrimination test to detect other vegetable oils with a similar fatty acid composition to have a fair trade and also as a tool for importers. Triacylglycerol composition is suggested to be included for the mentioned purpose (CXS 210-1999).	Iran
<p><i>Volume of production and consumption in individual countries and volume and pattern of trade between countries.</i></p> <p>Volume of production in the United States is provided, but no data is provided for production in other countries. Consumption and trade patterns within countries is not provided.</p> <p>The production in the US is given as 93,375 metric tons in 2020, and traded volume is only 300 metric tons. Estimated production in 2021 is given as 160,073 metric tons, of which only 1000 metric tons is expected to be exported. The quantity exported at present seems negligible, i.e. well below 1% compared to the total production in the US.</p> <p>Expected increase in hectareage in 2023 is mentioned, but no estimate provided for production or export at that point of time.</p> <p><i>Diversification of national legislations and apparent resultant or potential impediments to international trade.</i></p> <p>No evidence has been provided for potential impediments to international trade possible to evaluate the potential impediment to international trade.</p> <p><i>International or regional market potential.</i></p> <p>Not possible to evaluate the market potential as the quantities traded seem to be rather small (less than 1% of production). Most of the information provided is predictive.</p> <p><i>Amenability of the commodity to standardization.</i></p> <p>According to Project Document, the commodity can be standardised.</p>	Malaysia
Panama appreciates the work done and the new proposals given, and we express our agreement with it. We recommend your advance to the next stages.	Panama