Agenda Item 5 (CX/CAC 17/40/3) Final Adoption of Codex texts

Comments on draft standards and related texts submitted to the commission for adoption (Committee on Fats and Oils: Draft Standard for Fish Oils (REP 17/FO Para 28 Appendix III))

Addendum to IFFO’s comments on the adoption of the standard for fish oils (draft) under Agenda Item 5

IFFO believe that it is important to move forward with the Fish Oil Standard and supports the adoption of the Fish Oil Standard at Stage 8 as it is currently written. Our comments submitted to CL 2017/40/OCS-FO “Request for Comments at Step 8 on Draft Standard for Fish Oils” are not intended to delay or oppose the adoption process of the Codex Standard for Fish Oil. The draft standard for fish oil will facilitate trade and will promote good quality, authentic fish oil.

Our suggestions can be incorporated into the CL that was proposed by CCFO 25 (Report 2017):

21 However, a CL should be sent out after the adoption of the standard encouraging members to monitor the application of the standard with respect to the conformity of named fish oils with the requirements (especially the fatty acid profile), its effect on trade and to bring this information to CCFO26. Based on that data the Committee will evaluate whether a revision of the fatty acid profiles for named fish oils is necessary and whether other aspects such as additional complementary criteria are needed.

We propose that the current quality criteria such as the PV of 5 meq/kg may also be evaluated under the CL to determine whether the PV may be too low and may affect trade. IFFO suggested that a PV of 10 meq/kg may be more realistic for fish oils and will be in line with the Codex Standard for Named Vegetable Oils. The request for data by the proposed CL should therefore include data on the quality criteria in addition to the fatty acids profiles. The data collected by the CL will also be of value to determine whether a minimum quantity of the specific fish genus used for the production of named fish oils should be included.

If needed, IFFO’s other comments can be dealt with in future CCFO meetings.