

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 4

CRD8

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FATS AND OILS

25<sup>th</sup> Session

Kuala Lumpur, Malaysia, 27 February - 3 March 2017

### COMMENTS ON DRAFT STANDARD FOR FISH OILS

(Comment of Egypt, India, Thailand, Global Organization for EPA and DHA Omega-3s (GOED) and International Special Dietary Foods Industries (ISDI))

#### EGYPT

Egypt supports the document and the joint effort to develop a common standard on the following subject:

#### 7.3 Other labelling requirements

This section contains two options for the specific labelling of vitamin A and vitamin D. **The second option is preferred** because it offers flexibility as to the different requirements for retail sale. CX/FO 17/25/4 7

This section contains two options for the labelling of the content of EPA and DHA (obligatory/optional). **The first option (obligatory) is preferred.** EPA and DHA are the most valuable constituents of fish oils. According to Table 1 of the draft standard the EPA and DHA contents may vary over a rather broad range. This is valuable and essential information for the consumer about the real content of EPA and DHA in the different fish oils. It should therefore be safeguarded in order to ensure that consumers can make informed choices.

Egypt supports Norway that the ML for arsenic in fish oils apply to total arsenic or to only inorganic arsenic. The inorganic arsenic is considered far more toxic than the organic arsenic, and it is the organic arsenic which is mainly found in seafood

#### INDIA

Section 7.3- Other Labelling requirements

**India accepts the following text with regard to vitamin A and Vitamin D:**

For Fish liver oils (Section 2.3 and 2.4) the content of vitamin A and vitamin D **should** be given.

#### Rationale:

Since Vitamin A and Vitamin D are nutrients their content should be given on the labels so that the consumers are provided with important information so as to enable them to make wiser choices as fish liver oils are mainly consumed as health supplements.

India feels that the content of EPA and DHA **should** be given for all fish oils covered by this standard.

#### Rationale:

As fish oils are consumed for health benefits in regards to Omega-3 fatty acids, the content of EPA and DHA should be given on the label so that the consumer can differentiate between the various products. Thus, this information should not be optional but be made mandatory.

#### THAILAND

Thailand would like to submit comments to CL 2015/05-FO Part B, Point 4 as follows:

#### SECTION 7.3 OTHER LABELLING REQUIREMENT

In response to proposals for alternative texts in Section 7.3 "Other Labelling Requirements", Thailand is of the view that the text in options two appear in square brackets provide more flexibility to the different requirements of countries for retail sale. We also agree to use the term "shall" for declaring the content of EPA/DHA for fish oils under this proposed draft standard. The amended texts should be read:

~~[For fish liver oils (Sections 2.3 and 2.4) the content in vitamin A and vitamin D shall be given.~~

or

For fish liver oils (Sections 2.3 and 2.4) the content in vitamin A and vitamin D, naturally present or restored, shall be given if required by country of retail sale.]

The content of EPA and DHA [shall/may] be given for all fish oils covered by this Standard.

## GOED

### Fatty Acid Data for Wild Salmon Oil

GOED has received additional fatty acid data for wild salmon oil that it would like considered for inclusion in the draft standard. Based on this data, GOED proposes (as detailed in the following table) to adjust the wild salmon oil ranges for some of the fatty acids.

The below represents the range of fatty acid data from the 2013-2016 Alaskan Wild Salmon runs (May – August). The catch area is FAO 67, more specifically Prince William Sound, Valdez, and southeast Alaska which would be the area around Wrangell and Ketchikan, Alaska.

Fatty Acids	As written in CL 2015/23-FO July 2015	Proposed Revision
C14:0 myristic acid	2.0-4.5	2.0-5.0
C15:0 pentadecanoic acid	ND-1.0	No change
C16:0 palmitic acid	12.0-16.0	10.0-16.0
C16:1 (n-7) palmitoleic acid	4.5-6.0	4.0-6.0
C17:0 heptadecanoic acid	ND-1.0	No change
C18:0 stearic acid	2.0-5.0	No change
C18:1 (n-7) vaccenic acid	n/a	1.5-2.5
C18:1 (n-9) oleic acid	16.0-18.0	8.0-16.0
C18:2 (n-6) linoleic acid	1.5-2.0	1.5-2.5
C18:3 (n-3) linolenic acid	ND-1.0	ND-2.0
C18:3 (n-6) γ-linolenic acid	ND-1.0	ND-2.0
C18:4 (n-3) stearidonic acid	1.0-2.5	1.0-4.0
C20:0 arachidic acid	ND-0.5	No change
C20:1 (n-9) eicosenoic acid	4.5-6.0	2.0-10.0
C20:1 (n-11) eicosenoic acid	n/a	No change
C20:4 (n-6) arachidonic acid	0.5-1.0	0.5-2.5
C20:4 (n-3) eicosatetraenoic acid	1.0-2.0	1.0-3.0
C20:5 (n-3) Eicosapentaenoic acid	6.5-9.5	6.5-11.5
C21:5 (n-3) heneicosapentaenoic acid	ND-1.0	ND-4.0
C22:1 (n-9) erucic acid	1.0-1.5	ND-1.5
C22:1 (n-11) cetoleic acid	1.0-1.5	No change
C22:5 (n-3) docosapentaenoic acid	1.5-3.0	No change
C22:6 (n-3) docosahexaenoic acid	6.0-8.5	6.0-14.0

## ISDI

ISDI supports the adoption of the Codex draft Standard for Fish Oils at Step 8 during the 25<sup>th</sup> CCFO.

### Background:

Fish oil for human consumption is an important product that is produced and traded internationally. It is sold to consumers directly and used as a key nutritional ingredient in foods.

In nutrition products it is used to provide important fatty acids such as DHA (docosahexaenoic acid). In particular in **infant formula and foods for young children** the use of fish oil as a source of DHA is common.

A clear Codex Standard will help ensure consumer protection and facilitate international trade when countries recognize the CODEX Standard.

**Position:**

**ISDI supports the adoption of the Codex draft Standard for Fish Oils at Step 8 during CCFO25.**

- **ISDI supports the work previously done regarding Codex draft Standard for Fish Oils and in particular to keep the scope, descriptions and definitions of named and unnamed Fish Oils as agreed previously during CCFO24<sup>1</sup>.**
  - **ISDI is open to proposals of introductions of defined species, providing that criteria regarding volumes and fatty acids data are met.**
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