

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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CODEX COMMITTEE ON FATS AND OILS

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REPORT OF THE IN-SESSION WORKING GROUP ON THE PROPOSED DRAFT REVISIONS TO CODEX STANDARDS ON FATS AND OILS TO LIMIT TRANS-FATTY ACID INTAKE

(submitted by Canada, Chair of the In-session working group (ISWG))

Introduction

The Chair opened the session with an overview of the agenda item, recalling that CCFO28 had agreed to revise three Codex fats and oils standards to support global efforts to eliminate industrially produced *trans*-fatty acids (iTFA). She noted that the Committee had agreed that the revised standards should allow Members the flexibility to implement either or both of the WHO-recommended approaches of setting a 2% iTFA limit and/or prohibiting the use of partially hydrogenated oils (PHO).

The Chair indicated that the goal of the ISWG was to focus on several key issues identified in Part B of FO29/CRD20, including:

- The provision to limit iTFA/ban PHO;
- The compliance verification footnote; and
- The definitions for fully hydrogenated fats and oils (FHO) and PHO

Summary of Discussions of the ISWG

iTFA/PHO provision (Recommendation 7):

The ISWG noted acceptance of the revised scope for the provision as presented in CRD20. During the discussion, views diverged on whether the provision should retain both WHO-recommended approaches. Some delegations expressed a preference for a single requirement based solely on the 2% iTFA limit, citing trade considerations and ease of verification. Others underlined the importance of maintaining both approaches to provide flexibility for national implementation, consistent with the scope agreed at CCFO28.

The Chair recalled that the work was initiated on the basis of implementing either or both approaches and noted that the purpose of the discussion to consider how to operationalise both pathways within the standards.

There was broad support for part (a) of the provision regarding the limit on iTFA, whereas there was mixed support for part (b) regarding the PHO prohibition. For this reason, part (b) was placed in square brackets for continued discussion at plenary.

Compliance verification footnote (Recommendation 11):

There was mixed support for both options presented in CRD20 regarding a footnote to clarify non-analytical approaches for verifying compliance with this provision. Some delegations highlighted the practical limitations of analytical methods for distinguishing iTFA from ruminant TFA, while others cautioned against adding text beyond what is necessary or appropriate for a commodity standard. Given the divergent views, the proposed concise footnote under Option B was placed in square brackets and moved to Section 8 (Methods of Analysis and Sampling) for further consideration at plenary.

Definitions for FHO (Recommendation 3) and PHO (Recommendation 2):

The ISWG considered the proposed definitions for fully hydrogenated fats and oils (FHO) and PHO. The discussion focused initially on the definition for FHO, with several delegations proposing revisions to the definition contained in CRD20 and some proposing a definition more focussed on the product, rather than on the process. Considering the feedback from the ISWG, the Secretariat proposed a revised definition, which the Chair introduced for consideration and placed in square brackets. A corresponding update to the PHO definition was also proposed to maintain alignment and was likewise bracketed.

During the discussion, several delegations questioned whether a definition for FHO was needed at all for this work, noting that such a definition is not essential for applying the main provision. It was recalled that the definition had originally been introduced only to support the compliance verification footnote rather than as a stand-alone element of the standards. In light of the range of views and the desire to focus on elements directly relevant to the provision, the ISWG agreed to retain the proposed updated definitions for FHO and PHO in square brackets for further consideration at plenary.

Conclusion

The ISWG agreed to forward the revised text for the iTFA/PHO provision (Recommendation 7), including the PHO prohibition in square brackets, as well as the options for the compliance verification footnote under Recommendation 11 and the revised definitions for FHO and PHO, also in square brackets, to the plenary for further consideration.

ANNEX I

Annex I contains tracked versions of the following standards:

- Standard for Edible Fats and Oils Not Covered by Individual Standards (CXS 19-1981) – Part I
- Standard for Fat Spreads and Blended Spreads (CXS 256-1999) – Part II
- Standard for Named Animal Fats (CXS 211-1999) – Part III

Proposed revisions from CX/FO 26/29/5 are indicated in **black, bold and underlined text**.

Proposed amendments in response to comments from CL 2025/79-FO are indicated in **red, bold and underlined text**

Proposed revisions from the in-session working group are indicated in **green, bold and underlined text**

PART I - PROPOSED DRAFT REVISIONS TO THE STANDARD FOR EDIBLE FATS AND OILS NOT COVERED BY INDIVIDUAL STANDARDS (CXS 19-1981)

1. SCOPE

This standard (formerly CAC/RS 19-1969) applies to oils and fats and mixtures thereof in a state for human consumption. It includes oils and fats that have been subjected to processes of modification (such as trans-esterification or **hydrogenation**ⁱ) or fractionation.

This standard does not apply to any oil or fat which is covered by one of the following:

- *Standard for named animal fats* (CXS 211-1999),¹
- *Standard for named vegetable oils* (CXS 210-1999),²
- *Standard for olive oils and olive-pomace oils* (CXS 33-1981),³ and
- *Standard for fish oils* (CXS 329-2017).⁴

2. DESCRIPTIONS

2.1 Product definitions

Edible fats and oils are foodstuffs defined in Section 1 which are composed of glycerides of fatty acids. They are of vegetable, animal or marine origin. They may contain small amounts of other lipids such as Phosphatides, of unsaponifiable constituents and of free fatty acids naturally present in the fat or oil. Fats of animal origin must be produced from animals in good health at the time of slaughter and be fit for human consumption.

Virgin fats and oils are edible vegetable fats and oils obtained, without altering the nature of the oil, by mechanical procedures, e.g. expelling or pressing, and the application of heat only. They may be purified by washing with water, settling, filtering and centrifuging only.

Cold pressed fats and oils are edible vegetable fats and oils obtained, without altering the oil, by mechanical procedures, e.g. expelling or pressing, without the application of heat. They may have been purified by washing with water, settling, filtering and centrifuging only.

2.2 Other definitions

Fully hydrogenated fats and oils (FHO) are produced through a chemical process in which hydrogen is added to all the double bonds in unsaturated fats and oils, using a catalyst. This process converts all unsaturated bonds into saturated single bonds, resulting in a fully saturated fat structure. Because the hydrogenation is complete, the formation of industrially produced trans-fatty acids (iTFA) is minimized. The resulting fats and oils are typically solid or semi-solid at room temperature due to their higher melting point and exhibit enhanced stability and resistance to oxidation.

[Full hydrogenation of fats and oils is an industrial chemical process in which through the addition of hydrogen, all unsaturated bonds are converted to saturated single bonds resulting in a fully saturated fat structure. Because the hydrogenation is complete, the formation of industrially produced trans-fatty acids (iTFA) is minimized [to less than 2%]. The resulting fully hydrogenated fats and oils are typically solid or semi-solid at room temperature due to their higher melting point and exhibit enhanced stability and resistance to oxidation.]

ⁱ The term “hydrogenation” may refer to either full or partial hydrogenation, ~~as applicable under national and/or regional legislation or regulations. This reflects the global public health objective of eliminating industrially produced trans-fatty acids (iTFA) from the food supply, by setting a mandatory limit of not more than 2 g iTFA per 100 g of total fat in all foods, and/or by prohibiting the production and use of partially hydrogenated fats and oils in all foods.~~

Partially hydrogenated fats and oils (PHO) are produced through a chemical process that adds hydrogen to some of the double bonds in unsaturated fats and oils, using a catalyst. This converts those double bonds into single bonds, making the fat more saturated. During this process, some of the remaining double bonds undergo geometric isomerization, changing from the natural cis configuration to the trans configuration. The process can be controlled to create fats and oils with a wide range of physical properties, such as texture and melting point, regardless of the original oil composition. It also leads to the formation of trans-fatty acids, which may vary depending on the degree of hydrogenation.

[Partial hydrogenation of fats and oils is an industrial chemical process in which through the addition of hydrogen, some of the double bonds in unsaturated fats and oils are converted to single bonds resulting in a more saturated fat. During this process, some of the remaining double bonds undergo geometric isomerization, changing from the natural *cis* configuration to the *trans* configuration. The process can be controlled to create fats and oils with a wide range of physical properties, such as texture and melting point, regardless of the original oil composition. It also leads to the formation of *trans*-fatty acids, which may vary depending on the degree of hydrogenation.]

Industrially produced *trans*-fatty acids (iTFA) are *trans*-fatty acids obtained through industrial processes, primarily formed during the partial hydrogenation of unsaturated fats and oils, though smaller amounts may also be produced during other industrial processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to ~~cannot be~~ chemically distinguished from other TFA.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

[3.1] The following provision applies to the products covered by this standardⁱⁱⁱ:

- a) The amount of industrially produced *trans*-fatty acids in the final product shall not exceed 2g per 100 g of total fatty acids; and/or
- b) [The production and use of partially hydrogenated fats and oils is prohibited.]

Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to:

- a) Set a limit of industrially produced *trans*-fatty acids (iTFA) to not more than 2 g per 100 g of total fat in all foodsⁱⁱⁱ; and/or
- b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods^{iv}.

8. METHODS OF ANALYSIS AND SAMPLING

For checking the compliance with this standard, the methods of analysis and sampling contained in the *Recommended methods of analysis and sampling* (CXS 234-1999)¹² relevant to the provisions in this standard, shall be used.

[For checking the compliance with provision 3.1, non-analytical measures such as ingredient declarations and process controls may ~~shall~~ be used ~~instead of, or~~ in addition to, the relevant methods of analysis and sampling contained in the *Recommended methods of analysis and sampling* (CXS 234-1999) recognizing the limitations in analytical methods for differentiating iTFA from naturally occurring TFA.] ~~as compliance cannot rely solely on analytical methods.~~

ⁱⁱⁱ ~~Food” as defined in the Codex Alimentarius Commission Procedural Manual.~~ ⁱⁱⁱ

^{iv} ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION:

OPTION A: NO FOOTNOTE

OPTION B: REVISED OPTION 1 (CONCISE) (moved to Section 8):

[For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls ~~may shall~~ be used ~~instead of, or~~ in addition to, the relevant methods of analysis and sampling contained in the *Recommended methods of analysis and sampling* (CXS 234-1999) recognizing the limitations in analytical methods for differentiating iTFA from naturally occurring TFA], ~~as compliance cannot rely solely on analytical methods.~~

OPTION 2 (DETAILED):

For checking the compliance with this provision:

- a) For the iTFA limit, a hybrid approach shall be used, combining analytical methods contained in the *Recommended methods of analysis and sampling* (CXS 234-1999) for total *trans*-fatty acid quantification, with non-analytical measures such as ingredient declarations, PHO-free certifications, and supply chain records to estimate ruminant TFA content and infer iTFA quantity.
- b) For the PHO prohibition, compliance shall be verified through documentation, as there are no validated analytical methods to directly detect PHO in foods. Iodine value (IV) may be used as a screening tool at the ingredient level to help differentiate fully hydrogenated oils from PHO, noting that IV ≥ 4 is typically associated with PHO.

PART II - PROPOSED DRAFT REVISIONS TO THE STANDARD FOR FAT SPREADS AND BLENDED SPREADS (CXS 256-1999)

2. DESCRIPTION

2.1 Product definitions

2.1.1 Fat spreads and blended spreads

The products covered by this standard are foods that are plastic or fluid emulsions, principally of water and edible fats and oils.

2.1.2 Edible fats and oils

“Edible fats and oils” means foodstuffs composed of glycerides of fatty acids. They are of vegetable or animal (including milk) or marine origin. They may contain small amounts of other lipids such as Phosphatides, of unsaponifiable constituents and of free fatty acids naturally present in fat or oil. Fats of animal origin must, if originating from slaughtered animals, be obtained from animals in good health at the time of slaughter and fit for human consumption as determined by a competent authority recognized in national legislation. Fats and oils that have been subjected to processes of physical or chemical modification including fractionation, inter-esterification or **hydrogenation**ⁱ are included.

2.2 Other definitions

2.2.1 Fully hydrogenated fats and oils

“Fully hydrogenated fats and oils” (FHO) are produced through a chemical process in which hydrogen is added to all the double bonds in unsaturated fats and oils, using a catalyst. This process converts all unsaturated bonds into saturated single bonds, resulting in a fully saturated fat structure. Because the hydrogenation is complete, the formation of industrially produced trans-fatty acids (iTFA) is minimized. The resulting fats and oils are typically solid or semi-solid at room temperature due to their higher melting point and exhibit enhanced stability and resistance to oxidation.

[Full hydrogenation of fats and oils is an industrial chemical process in which through the addition of hydrogen, all unsaturated bonds are converted to saturated single bonds resulting in a fully saturated fat structure. Because the hydrogenation is complete, the formation of industrially produced trans-fatty acids (iTFA) is minimized [to less than 2%]. The resulting fully hydrogenated fats and oils are typically solid or semi-solid at room temperature due to their higher melting point and exhibit enhanced stability and resistance to oxidation.]

2.2.2 Partially hydrogenated fats and oils

“Partially hydrogenated fats and oils” (PHO) **are** produced through a chemical process that adds hydrogen to some of the double bonds in unsaturated fats and oils, using a catalyst. This converts those double bonds into single bonds, making the fat more saturated. During this process, some of the remaining double bonds undergo geometric isomerization, changing from the natural cis configuration to the trans configuration. The process can be controlled to create fats and oils with a wide range of physical properties, such as texture and melting point, regardless of the original oil composition. It also leads to the formation of trans- fatty acids, which may vary depending on the degree of hydrogenation.

[Partial hydrogenation of fats and oils is an industrial chemical process in which through the addition of hydrogen, some of the double bonds in unsaturated fats and oils are converted to single bonds resulting in a more saturated fat. During this process, some of the remaining double bonds undergo geometric isomerization, changing from the natural cis configuration to the trans configuration. The process can be controlled to create fats and oils with a wide range of physical properties, such as texture and melting point, regardless of the original oil composition. It also leads to the formation of trans-fatty acids, which may vary depending on the degree of hydrogenation.]

ⁱ ~~The term “hydrogenation” may refer to either full or partial hydrogenation, as applicable under national and/or regional legislation or regulations. This reflects the global public health objective of eliminating industrially produced trans fatty acids (iTFA) from the food supply, by setting a mandatory limit of not more than 2 g iTFA per 100 g of total fat in all foods, and/or by prohibiting the production and use of partially hydrogenated fats and oils in all foods.~~

2.2.3 Industrially produced trans-fatty acids

“Industrially produced trans-fatty acids” (iTFA) are trans-fatty acids obtained through industrial processes, primarily formed during the partial hydrogenation of unsaturated fats and oils, though

smaller amounts may also be produced during other industrial processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to cannot be chemically distinguished from other TFA.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Composition

3.1.1 Fat spreads

3.1.1.1 For these products, any milk fat content must be no more than 3 percent of the total fat content.

3.1.1.2 The fat content shall be as follows:

- e) Margarine ≥ 80%
- e) Fat spreadsⁱⁱ < 80%

3.1.2 Blended spreads

3.1.2.1 These are blended spreads in which milk fat is more than 3 percent of the total fat content. However, a higher minimum percentage of milk fat may be specified in accordance with the requirements of the country of the retail sale.

3.1.2.2 The fat content shall be as follows:

- (a) Blends ≥ 80%
- (b) Blended fat spread < 80%

3.2 The following provision applies to the products covered by this standardⁱⁱⁱ:

- a) The amount of industrially produced trans-fatty acids in the final product shall not exceed 2g per 100 g of total fatty acids; and/or
- b) [The production and use of partially hydrogenated fats and oils is prohibited].

Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to:

- a) Set a limit of industrially produced trans-fatty acids (iTFA) to not more than 2 g per 100 g of total fat in all foods^{iv}; and/or
- b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods^v.

8 METHODS OF ANALYSIS AND SAMPLING

[For checking the compliance with provision 3.1, non-analytical measures such as ingredient declarations and process controls may shall be used instead of, or in addition to, the relevant methods of analysis and sampling contained in the Recommended methods of analysis and sampling (CXS 234-1999) recognizing the limitations in analytical methods for differentiating iTFA from naturally occurring TFA.] as compliance cannot rely solely on analytical methods.

ⁱⁱ The term "margarine" may, in some cases, be used in the name of the food as provided for in Section 7.1.1

^{iv} Food" as defined in the Codex Alimentarius Commission Procedural Manual. ^{iii/}

^v ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION:

OPTION A: NO FOOTNOTE

OPTION B: REVISED OPTION 1 (CONCISE) (Moved to Section 8):

[For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls may shall be used instead of, or in addition to, the relevant methods of analysis and sampling contained in the Recommended methods of analysis and sampling (CXS 234-1999) recognizing the limitations in analytical methods for differentiating iTFA from naturally occurring TFA], as compliance cannot rely solely on analytical methods.

OPTION 2 (DETAILED):

For checking the compliance with this provision:

- c) For the iTFA limit, a hybrid approach shall be used, combining analytical methods contained in the

~~Recommended methods of analysis and sampling (CXS 234-1999) for total trans fatty acid quantification, with non-analytical measures such as ingredient declarations, PHO-free certifications, and supply chain records to estimate ruminant TFA content and infer iTFA quantity.~~

- d) ~~For the PHO prohibition, compliance shall be verified through documentation, as there are no validated analytical methods to directly detect PHO in foods. Iodine value (IV) may be used as a screening tool at the ingredient level to help differentiate fully hydrogenated oils from PHO, noting that $IV \geq 4$ is typically associated with PHO.~~

PART III - PROPOSED DRAFT REVISIONS TO THE STANDARD FOR NAMED ANIMAL FATS (CXS 211-1999)

2. DESCRIPTION

2.1 Product definitions

2.1.1 Lard

Pure rendered lard is the fat rendered from fresh, clean, sound fatty tissues from swine (*Sus scrofa*) in good health, at the time of slaughter, and fit for human consumption. The tissues do not include bones, detached skin, head skin, ears, tails, organs, windpipes, large blood vessels, scrap fat, skimmings, settlings, pressings, and the like, and are reasonably free from muscle tissues and blood.

Lard subject to processing may contain refined lard, lard stearin and **hydrogenated**¹ lard, or be subject to processes of modification provided that it is clearly labelled.

2.1.2 Rendered pork fat

Rendered pork fat is the fat rendered from the tissues and bones of swine (*Sus scrofa*) in good health, at the time of slaughter, and fit for human consumption. It may contain fat from bones (properly cleaned), from detached skin, from head skin, from ears, from tails and from other issues fit for human consumption.

Rendered pork fat subject to processing may also contain refined lard, refined rendered pork fat, **hydrogenated**ⁱ lard, **hydrogenated**ⁱ rendered pork fat, lard stearin and rendered pork fat stearin provided that it is clearly labelled.

Premier jus (oleo stock) is the product obtained by rendering at low heat the fresh fat (killing fat) of heart, caul, kidney and mesentery collected at the time of slaughter of bovine animals in good health at the time of slaughter and fit for human consumption, as well as cutting fats.

2.1.3 Edible tallow

Edible tallow (dripping) is the product obtained by rendering the clean, sound, fatty tissues (including trimming and cutting fats), attendant muscles and bones of bovine animals and/or sheep (*Ovis aries*) in good health at the time of slaughter and fit for human consumption.

Edible tallow subject to processing may contain refined edible tallow, provided that it is clearly labelled.

2.2 Other definitions

2.2.1 Fully hydrogenated fats and oils

Fully hydrogenated fats and oils (FHO) are produced through a chemical process in which hydrogen is added to all the double bonds in unsaturated fats and oils, using a catalyst. This process converts all unsaturated bonds into saturated single bonds, resulting in a fully saturated fat structure. Because the hydrogenation is complete, the formation of industrially produced trans-fatty acids (iTFA) is minimized. The resulting fats and oils are typically solid or semi-solid at room temperature due to their higher melting point and exhibit enhanced stability and resistance to oxidation.

[Full hydrogenation of fats and oils is an industrial chemical process in which through the addition of hydrogen, all unsaturated bonds are converted to saturated single bonds resulting in a fully saturated fat structure. Because the hydrogenation is complete, the formation of industrially produced trans-fatty acids (iTFA) is minimized [to less than 2%]. The resulting fully hydrogenated fats and oils are typically solid or semi-solid at room temperature due to their higher melting point and exhibit enhanced stability and resistance to oxidation.]

¹ The term “hydrogenated” may refer to either full or partial hydrogenation, ~~as applicable under national and/or regional legislation or regulations. This reflects the global public health objective of eliminating industrially produced trans-fatty acids (iTFA) from the food supply, by setting a mandatory limit of not more than 2 g iTFA per 100 g of total fat in all foods, and/or by prohibiting the production and use of partially hydrogenated fats and oils in all foods.~~

2.2.2 Partially hydrogenated fats and oils

Partially hydrogenated fats and oils (PHO) are produced through a chemical process that adds hydrogen to some of the double bonds in unsaturated fats and oils, using a catalyst. This converts those double bonds into single bonds, making the fat more saturated. During this process, some of the remaining double bonds undergo geometric isomerization, changing from the natural cis configuration to the trans configuration. The process can be controlled to create fats and oils with a wide range of physical properties, such as texture and melting point, regardless of the original oil c g on the degree of hydrogenation.

[Partial hydrogenation of fats and oils is an industrial chemical process in which through the addition of hydrogen, some of the double bonds in unsaturated fats and oils are converted to single bonds resulting in a more saturated fat. During this process, some of the remaining double bonds undergo geometric isomerization, changing from the natural cis configuration to the trans configuration. The process can be controlled to create fats and oils with a wide range of physical properties, such as texture and melting point, regardless of the original oil composition. It also leads to the formation of trans-fatty acids, which may vary depending on the degree of hydrogenation.]

2.2.3 Industrially produced *trans*-fatty acids

Industrially produced *trans*-fatty acids (iTFA) are *trans*-fatty acids obtained through industrial processes, primarily formed during the partial hydrogenation of unsaturated fats and oils, though smaller amounts may also be produced during other industrial processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and ~~are difficult to cannot be~~ chemically distinguished from other TFA.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Gas-liquid chromatography (GLC) ranges of fatty acid composition (expressed as percentages)

Samples falling within the appropriate ranges specified below are in compliance with this standard.

	Lard rendered pork fat	Premier jus tallow
C6:0	< 0.5 in total	< 0.5 in total
C8:0		
C10:0		
C12:0		
C14:0	1.0–2.5	2–6
C14:ISO	< 0.1	< 0.3
C14:1	< 0.2	0.5–1.5
C15:0	< 0.2	0.2–1.0
C15:ISO	< 0.1	< 1.5 in total
C15:ANTI ISO	< 0.1	
C16:0	20–30	20–30
C16:1	2.0–4.0	1–5
C16:ISO	< 0.1	< 0.5
C16:2	< 0.1	< 1.0
C17:0	< 1	0.5–2.0
C17:1	< 1	< 1.0
C17:ISO	< 0.1	< 1.5 in total
C17: ANTI ISO	< 0.1	
C18:0	8–22	15–30
C18:1	35–55	30–45
C18:2	4–12	1–6
C18:3	< 1.5	< 1.5
C20:0	< 1.0	< 0.5
C20:1	< 1.5	< 0.5
C20:2	< 1.0	< 0.1
C20:4	< 1.0	< 0.5

C22:0	< 0.1	< 0.1
C22:1	< 0.5	not detected

3.2 The following provision applies to the products covered by this standard²:

- a) Industrially produced *trans*-fatty acids in the final product shall not exceed 2g per 100 g of total fatty acids; and/or
- b) [The production and use of partially hydrogenated fats and oils is prohibited.]

Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to:

- a) Set a limit of industrially produced *trans*-fatty acids (iTFA) to not more than 2 g per 100 g of total fat in all foods³; and/or
- b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods⁴.

8 METHODS OF ANALYSIS AND SAMPLING

[For checking the compliance with provision 3.1, non-analytical measures such as ingredient declarations and process controls may shall be used instead of, or in addition to, the relevant methods of analysis and sampling contained in the *Recommended methods of analysis and sampling* (CXS 234-1999) recognizing the limitations in analytical methods for differentiating iTFA from naturally occurring TFA.] as compliance cannot rely solely on analytical methods.

³ Food” as defined in the *Codex Alimentarius Commission Procedural Manual*.^{11/}

⁴ ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION:

OPTION A: NO FOOTNOTE

OPTION B: REVISED OPTION 1 (CONCISE):

[For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls may shall be used instead of, or in addition to, the relevant methods of analysis and sampling contained in the *Recommended methods of analysis and sampling* (CXS 234-1999) recognizing the limitations in analytical methods for differentiating iTFA from naturally occurring TFA]., as compliance cannot rely solely on analytical methods.

OPTION 2 (DETAILED):

For checking the compliance with this provision:

- e) For the iTFA limit, a hybrid approach shall be used, combining analytical methods contained in the *Recommended methods of analysis and sampling* (CXS 234-1999) for total *trans*-fatty acid quantification, with non-analytical measures such as ingredient declarations, PHO-free certifications, and supply chain records to estimate ruminant TFA content and infer iTFA quantity.

For the PHO prohibition, compliance shall be verified through documentation, as there are no validated analytical methods to directly detect PHO in foods. Iodine value (IV) may be used as a screening tool at the ingredient level to help differentiate fully hydrogenated oils from PHO, noting th