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 - www.codexalimentarius.org

Agenda Item 5

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CODEX COMMITTEE ON FATS AND OILS

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PROPOSED DRAFT REVISIONS TO CODEX STANDARDS ON FATS AND OILS TO REDUCE TRANS-FATTY ACID (TFA) INTAKE

Comments in reply to CL 2025/79 – FO

Submitted by:

Argentina, Australia, Brazil, Canada, Chile, Costa Rica, Egypt, Food Industry Asia, Guatemala, Indonesia, Japan, Kenya, Malaysia, Norway, Panama, Paraguay, Thailand, Tunisia, Uruguay, United States of America and Coalition for Americas' Health, International Commission for Uniform Methods of Sugar Analysis (ICUMSA), IDF/FIL, International Association of Consumer Food Organizations, the Healthy Caribbean Coalition, World Health Organization (WHO), World Federation of Public Health Associations, World Public Health Nutrition Association

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/79-FO[1] issued in December 2025. 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 Annex

2. The comments submitted through the OCS are hereby annexed and presented in tabulated format.

[1] https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/

ANNEX I

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
Australia thanks the Chairs and EWG for this comprehensive report. Australia supports the objective to reduce TFA intake by aligning relevant Codex standards where appropriate with the WHO's REPLACE recommendations. However, we note that alignment is not necessarily the same as replication of the WHO recommendation to competent authorities, because alignment must take account of the scope and purpose of Codex standards. In this instance, replication of the WHO recommendation to set limits for and/or prohibit iTFA/PHO in all foods goes beyond the scope of CCFO commodity standards, and is not appropriate to include in the Essential Composition and Quality Factors section of specific fats and oils standards. We would encourage the committee to consider options for reframing the recommended provision to fit within the scope of the CCFO standards. We also note that CCNFSDU has a broader remit to consider guidance that could apply horizontally across all food types.	**Australia**
Brazil comments (note iii): Brazil is of the opinion that the concise option, option 1, is enough for the context of the standard.	**Brazil**
Canada strongly supports the proposed draft revisions to the Codex standards aimed at eliminating industrially produced trans-fatty acids (iTFA) from the global food supply, in alignment with WHO's REPLACE initiative. Canada implemented a mandatory prohibition on partially hydrogenated oils (PHO) in 2018 and endorses Codex efforts to harmonize international standards to protect public health and facilitate fair trade. Canada agrees with the recommendations presented by the Chair of the EWG.	**Canada**
La normativa sanitaria chilena se encuentra actualmente alineada con las recomendaciones de la OMS en relación con la reducción de la ingesta de ácidos grasos trans producidos industrialmente (AGTi). El artículo 248 del Reglamento Sanitario de los Alimentos (DTO-977) establece un límite máximo de 2 % de AGTi en los alimentos, equivalente a la opción basada en límites máximos considerada por el Codex. En consecuencia, Chile se inclina por la opción 1 de la propuesta, sin perjuicio de evaluar, a futuro, eventuales ajustes adicionales en el marco de la evolución de la evidencia científica y de las orientaciones internacionales.	**Chile**
Costa Rica agradece a las presidencias del Grupo de Trabajo por su labor y por la oportunidad de formular comentarios, y desea expresar su apoyo al objetivo de la OMS de eliminar los ácidos grasos trans industriales (AGTi). No obstante, recuerda que el proyecto se planteó con un enfoque en las grasas y aceites utilizados como ingredientes y no en "todos los alimentos", y que, conforme al Manual de Procedimiento, la sección de "Factores esenciales relativos a la composición y la calidad" debe establecer requisitos aplicables únicamente al producto cubierto por la norma y no al universo de alimentos, por lo que una norma para grasas y aceites, debe limitar sus disposiciones a los productos definidos en su ámbito de aplicación. En cuanto a las consultas a otros comités pertinentes, Costa Rica considera necesaria la aclaración del uso del término "hidrogenado" en la Norma general para el etiquetado de los alimentos preenvasados (CXS 1-1985), a través del CCFL, para distinguir claramente entre aceites parcialmente hidrogenados y aceites totalmente hidrogenados, sin que ello implique necesariamente esperar a la conclusión de los trabajos del CCFO. Adicionalmente, estima que remitir al CCNFSDU la revisión de la definición de AGT contenida en las directrices CXG 2-1985 aportaría mayor claridad y coherencia, instando al Comité a que dicha remisión se realice una vez que la definición esté consensuada y no hasta la finalización de los trabajos actualmente en curso en el CCFO.	**Costa Rica**

COMMENT	MEMBER / OBSERVER
También apoya que el Comité solicite al CCMAS que examine y ratifique los métodos y las disposiciones conexas necesarios para la verificación del cumplimiento.	
Egypt appreciates the work done in the documen and would like to provide the following comments : 1. The World Health Organization (WHO) recommends that countries adopt one of two best-practice policy options to eliminate industrially produced trans-fatty acids from the global food supply, namely: - The implementation of a mandatory national limit of no more than 2 g of iTFA per 100 g of total fat in all fats, oils, and foods; or - The implementation of a mandatory national ban on the production and use of partially hydrogenated oils (PHOs) in all foods. With reference to point 27, Egypt takes note of the latest draft definition of “industrially produced trans-fatty acids (iTFA),” which states: “Industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization.” Furthermore, Egypt would like to highlight that several countries, including Canada and the Kingdom of Saudi Arabia, have addressed trans-fatty acids through mandatory labeling requirements, whereby the trans-fatty acid content is declared on edible oil packaging(STANDARD FOR NAMED VEGETABLE OILS CXS 210-1999). Such measures contribute to increased transparency, consumer awareness, and public health protection. In light of the above, Egypt supports the adoption of clear, science-based definitions and regulatory measures aligned with WHO recommendations, including limits or bans on iTFA, as well as appropriate labeling provisions, to effectively reduce iTFA intake and protect public health. 2. Methods of Analysis and Sampling: With reference to point 48, Egypt proposes the introduction of a clear and harmonized definition for the claim “free of trans fats,” based on analytical results, in order to ensure consistency, enforceability, and consumer protection. For regulatory and labeling purposes, a food product may be considered “free of trans fats” when the result of laboratory analysis shows a trans-fatty acid content greater than 0.0% and not exceeding 0.5% of total fat. This tolerance accounts for unavoidable trace amounts of trans-fatty acids that may occur due to natural presence or minor formation during permitted processing practices, while remaining consistent with public health objectives The establishment of this definition would support accurate labeling, facilitate international trade, and align with existing practices adopted by several Codex members. 3. Egypt proposes the establishment of a dedicated working group to develop a “Code of Frying Practice for vegetables oil ”, in view of its potential impact on the formation of trans-fatty acids. Scientific evidence indicates that certain frying practices, particularly prolonged or repeated heating of oils at high temperatures, may lead to the formation of trans-fatty acids, in addition to other undesirable degradation products. In the absence of harmonized international guidance, variations in frying practices may pose risks to public health and create inconsistencies in food quality and safety. Egypt considers that the development of a Codex Code of Practice for Frying would provide practical, science-based guidance on the selection of appropriate frying oils, control of frying temperatures and duration, oil turnover, and proper handling and disposal of used	**Egypt**

COMMENT	MEMBER / OBSERVER
oils. Such guidance would contribute to minimizing the formation of trans-fatty acids and other harmful compounds, while supporting food safety and quality objectives. Accordingly, Egypt supports the establishment of a Codex working group to elaborate this Code of Practice, taking into account existing scientific evidence, WHO recommendations, and the experiences of Codex Members. PROPOSED DRAFT REVISIONS TO THE STANDARD FOR (CXS 19-1981),(CXS 256-1999),(CXS 211-1999) Egypt suggests to replace the proposal of hydrogenation with fully hydrogenation and delete the related note (i)	
In general, Indonesia supports the proposed placement of the footnotes, the new definitions, and the inclusion of the statement on the PHO prohibition and/or iTFA restriction. However, Indonesia provides the following comments for the Committee's further consideration.	**Indonesia**
Japan's comments on the draft standards are provided on the following pages, with particular reference to the section on essential composition. With regard to the EWG report, Japan supports discussing the proposed Recommendations 1–12 at CCFO29. Among these, Japan has concerns regarding the methods of analysis (Recommendation 12). Using AOAC 996.06 as an example, this method is currently listed in CXS 234 for use in infant formula. However, it should be recognized that analytical performance may vary depending on the food matrix, and that different target foods may yield different analytical outcomes. Therefore, it is not necessarily clear whether an analytical method applicable to infant formula is also suitable for other foods. Additionally, with existing methods, greater variability in analytical results is known to occur, especially for short-chain fatty acids such as butyric acid. Furthermore, depending on the condition of the GC column and other analytical conditions, cis/trans isomers may not be adequately separated and may be eluted and detected together, which could make it difficult to ensure the reliability of quantitative results for trans fatty acids. At present, the proposed framework consists of: (i) a regulatory limit of iTFA < 2 g per 100 g of total fat; (ii) an analytical approach based on the determination of total TFA; and (iii) an operational approach whereby compliance is assessed through an overall judgment that combines analytical results with past manufacturing information and other supplementary documentation. Under such a structure, it is considered that compliance with the proposed regulatory requirement cannot be assessed solely on the basis of analytical results in an objective and reproducible manner. In the past, when AOAC 996.06 was discussed by CCMAS36 (2015), concerns were already raised by AOCS that "low levels of trans fatty acids cannot be routinely determined by the average laboratory with any high degree of reproducibility. This situation might lead to confusion in the marketplace and in general trade where products might be deemed to be "trans-free" by one laboratory and above the threshold for this claim in another" (REP15/MAS, para. 33). A similar concern may arise in the present context if "TFA-free" is replaced by "iTFA < 2 g per 100 g of total fat." Such situations are of particular concern for countries that export products from jurisdictions that do not apply an iTFA maximum limit to jurisdictions that apply an iTFA maximum limit, where compliance with requirements not imposed domestically must be demonstrated. In these circumstances, reliance on analytical results that require interpretation based on manufacturing information or other supplementary documentation may raise challenges in ensuring consistent and objective enforcement, and could potentially lead to uneven application in trade. Accordingly, robust analytical methods with clearly defined and reproducible performance characteristics are essential.	**Japan**

COMMENT	MEMBER / OBSERVER
In order for CCMAS to adequately respond to these needs, it would be necessary for CCFO to clearly indicate to CCMAS: (i) which fatty acid molecular species are included within the analytical scope; (ii) how the proposed 2 g iTFA limit is to be interpreted for compliance assessment, in light of its relationship to the fatty acid molecular species covered by the iTFA definition (iii) the range of foods to be subject to analysis, including the scope of composite foods; and (iv) the performance parameters demonstrating whether AOAC 996.06 or other analytical methods can meet these requirements (e.g. limits of detection (LOD) and limits of quantification (LOQ) per individual fatty acid molecular species, as well as repeatability (RSDr) and reproducibility (RSDR)), and, where necessary, clear criteria regarding the separation of fatty acid isomers (in particular cis/trans), such as chromatographic resolution, or the proposal of alternative analytical methods that can meet the required performance criteria.	
Malaysia would like to thank Canada and Saudi Arabia for respectively chairing and co-chairing the Electronic Working Group (EWG) on the Proposed Draft Revisions to Codex Standards on Fats and Oils to Reduce Trans-Fatty Acid (TFA) Intake. Malaysia appreciates the opportunity to provide comments on the EWG Report CX/FO 26/29/5 as in relevant sections of Annex II. Our comment on Part I also applies to relevant section of Part II and III. Further, since Reccomendation 5, 9, 10 and 12 do not appear in Annex II, the followings are our comments on these. **Recommendation 5:** Malaysia notes that the proposed definition of industrially produced trans-fatty acids (iTFA) does not conflict with the definition of trans-fatty acids in CXG 2-1985 used for nutrition labelling, as the two definitions serve distinct regulatory purposes. **Recommendation 9:** Malaysia has no objection to the proposed EWG recommendation to refer the matter of potential revisions to Section 4.2.3.1 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) to CCFL. **Recommendation 10** Malaysia has no objection to the recommended structural revision of CXS 19-1981, as it supports consistency across Codex standards and facilitates effective enforcement. **Recomendation 12** With reference to Table A.5 (Investigative Methods for Rapid Screening), Malaysia would like to highlight that the AOCS Method Cd 14e-09 Total Isolated Trans Fat by Negative Second Derivative Infrared Spectroscopic Method has been validated by a Standards Development Organization (SDO).	**Malaysia**
Norway supports the global public health objective to reduce the intake of industrially produced trans fatty acids from partially hydrogenated vegetable oils. We would like to provide the following comment on Recommendation 5: We do not see a need for the Codex definition of trans fatty acids to be revised. If, however the definition is revised, we recommend that the Conjugated Linoleic Acid (CLA) remains excluded from the definition. The focus of the WHO REPLACE is to eliminate industrial trans fatty acids from the global food supply, we believe any work undertaken by Codex should not impact the exclusion of CLA isomers from the Codex definition for trans fatty acids in foods.	**Norway**
Panama expresses support for the progression of this document to the next stage of the process. We highly value both the content of the proposal and the initiative itself, recognizing its strategic importance for strengthening public health standards in our region.	**Panama**

COMMENT	MEMBER / OBSERVER
Furthermore, following relevant consultations with the Panamanian industrial sector, it is confirmed that companies have already begun the process of adapting their production plants. These efforts are aimed at mitigating the negative impact of hydrogenated and partially hydrogenated fats, responding proactively to global concerns regarding their link to the development of oncological diseases. Panamá manifiesta su respaldo al avance del presente documento hacia la siguiente etapa del trámite. Valoramos positivamente tanto el contenido de la propuesta como la iniciativa en sí, reconociendo su importancia estratégica para el fortalecimiento de los estándares de salud pública en nuestra región. Asimismo, tras realizar las consultas pertinentes con el sector industrial panameño, se confirma que las empresas ya han iniciado procesos de adecuación en sus plantas de producción. Estos esfuerzos están orientados a mitigar el impacto negativo de las grasas hidrogenadas y parcialmente hidrogenadas, respondiendo de manera proactiva a las preocupaciones globales sobre su vínculo con el desarrollo de enfermedades oncológicas.	
The United Arab Emirates (UAE) would like to thank the Electronic Working Group (EWG), for the comprehensive work undertaken to support the global efforts aimed at eliminating industrially produced trans-fatty acids (iTFA), in alignment with WHO recommendations. After reviewing draft revisions to the Codex Standards on Fats and Oils to Limit Trans-Fatty Acid (TFA) intake as contained in document CX/FO 26/29/5 (Annex II, Part I – III) the UAE provides the following comments: • Implement legislative or regulatory measures: The UAE supports implement mandatory measures to limit industrially produced trans-fatty acids (iTFA) to a maximum of 2 g per 100 g of total fat in all foods and to prohibit the use of partially hydrogenated fats and oils (PHO). • Definition of “Industrially produced trans-fatty acids” (iTFA): The UAE notes that the proposed draft definition describes iTFA as trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils, while also acknowledging the possibility of smaller amounts being produced during other industrial processes such as refining and deodorization. Therefore, the UAE recommends that the Committee consider additional clarification regarding the reference to iTFA formation during refining and deodorization, to avoid potential misinterpretation during regulatory implementation and enforcement. • Analytical methods: The UAE supports the technical statement that iTFA are defined by their method of production and cannot be chemically distinguished from other trans-fatty acids. The UAE highlights that this analytical limitation has practical implications for compliance assessment, as routine laboratory testing generally quantifies total trans-fatty acids without differentiating between iTFA and naturally occurring ruminant trans-fatty acids. Therefore, the UAE supports the use of complementary approaches such as documentation, supply-chain verification, and supplier declarations (e.g., PHO-free certification) as part of effective enforcement mechanisms.	**United Arab Emirates**
The United States participated in the Electronic Working Group and supports the initiative to revise CCFO standards to limit iTFA intake. Below are the United States’ comments on each of the EWG recommendations. • **Recommendation 1:** The United States agrees to include definitions for PHO’s and TFA’s under a new section 2.2 Other Definitions within each standard. • **Recommendation 2:** For the proposed definition for partially hydrogenated fats and oils (PHO), the United States proposes some changes to the text that refocus the definition on the product rather than on the process, and which provides a measurable limit to distinguish PHO from fully hydrogenated oils (IV >4).	**USA**

COMMENT	MEMBER / OBSERVER
The EWG proposed definition: “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.” The U.S suggested revised definition: Partially hydrogenated fats and oils (PHO) are fats and oils that have been hydrogenated, but not to complete or near complete saturation, and with an iodine value greater than 4 as determined by a method that is suitable for this analysis (e.g., ISO 3961 or equivalent). The incomplete hydrogenation may result in oils with varying amounts of trans fatty acids. • **Recommendation 3:** For the proposed definition for fully hydrogenated fats and oils, the United States proposes some changes to the text that refocus the definition on the product rather than on the process, and which provides a measurable limit to distinguish fully hydrogenated oils (IV <4) from PHO. The EWG proposed definition: “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”. The U.S. suggested revised text: Fully hydrogenated oils (FHO) are fats and oils that have been hydrogenated to complete or near complete saturation, and with an iodine value (IV) of 4 or less, as determined by a method that is suitable for this analysis (e.g., ISO 3961 or equivalent). • **Recommendation 4:** For the proposed definition for industrially produced trans-fatty acids (iTFA), the United States agrees with the definition with minor modification of adding "ruminant" before TFA in the last sentence. However, since it is unclear if reliable methods are available to distinguish iTFA and naturally occurring TFA, the best practice may be to focus on limiting PHO where these forms of TFA are present. The EWG proposed definition: “industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to chemically distinguish from naturally occurring ruminant TFA”. • **Recommendation 5:** The United States agrees that once the CCFO completes this work, the committee may propose to refer the matter of revising the Codex definition of trans-fatty acids in CXG 2-1985 to CCNFSDU. • **Recommendation 6:** The United States agrees with the inclusion of the proposed exclusionary provisions for PHO and iTFA in the “Essential Composition and Quality Factors” section of each standard. • **Recommendation 7**: The United States provides the following input on the draft wording*: The provisions are clear. However, since it is unclear if reliable methods exist to distinguish iTFA from naturally occurring ruminant TFA, it may be challenging to enforce provision (i), the set limit of 2 g iTFA per 100 g of total fat, in complex food products. The United States	

COMMENT	MEMBER / OBSERVER
acknowledges that ingredient declaration and the hybrid approach detailed for recommendation #11 could assist in the determination. Provision (ii) on PHO prohibition is in line with FDA guidelines for partially hydrogenated oils. *The proposed draft wording is: "Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: i. Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods*; and/or ii. Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods" *"Food", as defined in the Codex Alimentarius Commission Procedural Manual". • **Recommendation 8:** The United States finds the footnote acceptable but prefers the option to provide explicit clarification in the main text each time the terms are mentioned: "fully hydrogenated, or, where permitted by competent national and/or regional authorities, partially hydrogenated." • **Recommendation 9:** The United States agrees that the Committee consider the proposal to refer the matter of potential revisions to Section 4.2.3.1 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) to CCFL to improve clarity and support enforcement of the work of the CCFO, following its completion. • **Recommendation 10:** The United States agrees with the recommendation to consider the structural revision to CXS 19-1981 to include a "Methods of Analysis" section in the main body while retaining this section in the Appendix, ensuring consistency across Codex standards and to support effective enforcement of the iTFA limit and/or PHO prohibition. • **Recommendation 11:** The United States agrees to the inclusion of a footnote to clarify the compliance verification for the provision to limit iTFA and/or prohibit PHO. A concise footnote #1 is preferable as it provides greater flexibility toward compliance verification by national authorities. • **Recommendation 12:** the United States agrees to recommend that the Committee request CCMAS to review and endorse the methods and related provisions necessary for verification of compliance.	
As general for 'Enforcement Footnote Options for Committee Consideration'', FIA is supportive of the detailed footnote (Option 2). The detailed footnote provides a lot more clarity on why/the importance of differentiation. Additional Comment for Annex II - Part III FIA recommend a revision to the statement to the statement on Section 8 on the Methods of Analysis and Sampling in this standard to "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) 7 relevant to the provisions in this standard, may be used. Where necessary, these methods may be complemented by other non-analytical measures, recognizing the limitations of analytical methods in verifying compliance with provisions related to industrially produced trans-fatty acids. ". 1. Replacing 'shall be used' to 'maybe used' as this approach is consistent with Codex principles which provide science-based standards and guidance while leaving the choice of compliance and enforcement tools to competent national and/or regional authorities. 2. Addition statement on acknowledging combination of alternative non-analytical method, recognizing the iTFA cannot be reliably distinguished from other TFA by analytical methods alone.	**Food Industry Asia**

COMMENT	MEMBER / OBSERVER
3. To align the statement in section 8 across other related fats and oil standard. Additional comment for Annex II - Part II FIA recommend a revision to the statement to the statement on Section 8 on the Methods of Analysis and Sampling in this standard to: “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) 8 relevant to the provisions in this standard, may be used. Where necessary, these methods may be complemented by other non-analytical measures, recognizing the limitations of analytical methods in verifying compliance with provisions related to industrially produced trans-fatty acids.”. 1. Replacing ‘shall be used’ to ‘maybe used’ as this approach is consistent with Codex principles which provide science-based standards and guidance while leaving the choice of compliance and enforcement tools to competent national and/or regional authorities. 2. Addition statement on acknowledging combination of alternative non-analytical method, recognizing the iTFA cannot be reliably distinguished from other TFA by analytical methods alone. 3. To align the statement in section 8 across other related fats and oil standard.	
The changes all seem reasonable and well-explained.	**ICUMSA**
In addition to the comments provided on Recommendations 2 and 4, IDF would like to comment on Recommendation 5 (The Committee is invited to review and provide input on the proposal to refer the matter of revising the Codex definition of trans-fatty acids in CXG 2-1985 to CCNFSDU, following the CCFO’s completion of this work). We do not support nor see a need for the Codex definition of trans fatty acids to be revised, based on our feedback to the iTFA definition above, we do not see a need for the Codex trans fatty acid definition to be revised as via the iTFA definition it can be made clear that ruminant trans fatty acids are out of scope of the standards addressing iTFA. If, however, CCFO29 recommends CCNFSDU revises the Codex definition of trans fatty acids, we strongly recommend that the Conjugated Linoleic Acid (CLA) remains excluded from the Codex trans fatty acid definition.We support the global public health objective to reduce the intake of industrially produced trans fatty acids from partially hydrogenated vegetable oils. As the focus of the WHO REPLACE is to eliminate industrial trans fatty acids from the global food supply, we believe any work undertaken by Codex should not impact the exclusion of CLA isomers from the Codex definition for trans fatty acids in foods and have noted the following points of address to support our position: • CLA is structurally different from industrially produced trans fatty acids, as the trans double bond is part of the conjugated double bond structure. Trans double bonds in conjugation behave differently from isolated trans double bonds (or methylene interrupted double bonds). • The conclusions drawn by the 2023 WHO Guideline on Saturated fatty acid and trans-fatty acid intake for adults and children (2023 WHO Guideline[1]) regarding CLA do not have referenced scientific studies supporting the conclusion to include CLA in the overall definition of trans fatty acids. • Furthermore, one study referenced by the 2023 WHO Guideline states: “Animal and cell culture studies demonstrate that the effects of rTFA may differ from those of iTFA, and they suggest that VA [vaccenic acid] and c9,t11-CLA may be hypo-cholesterolemic and antiatherogenic.”[2] The isomer of CLA that is naturally occurring in ruminant fat is predominantly c9,t11-CLA.[1] Saturated fatty acid and trans-fatty acid intake for adults and children: WHO guideline.Geneva: World Health Organization; 2023. https://iris.who.int/server/api/core/bitstreams/463fa93e-6c17-4e5b-a4d7-928354ea34c3/content[2]	**IDF/FIL**

COMMENT	MEMBER / OBSERVER
Gebauer, S. K., Destaillats, F., Dionisi, F., Krauss, R. M., & Baer, D. J. (2015). Vaccenic acid and trans fatty acid isomers from partially hydrogenated oil both adversely affect LDL cholesterol: a double-blind, randomized controlled trial. American Journal of Clinical Nutrition, 102(6), 1339–1346. https://doi.org/10.3945/ajcn.115.116129	
The World Federation of Public Health Associations strongly supports the draft revisions to CXS 19-1981 (Standard for Edible Fats and Oils Not Covered by Individual Standards), CXS 256-1999 (Standard for Fat Spreads and Blended Spreads), and CXS 211-1999 (Standard for Named Animal Fats). We note that the below draft text, proposed to be incorporated into each of the three Standards, aligns with World Health Organization (WHO) best practice (1): 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 ; and/or b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods. Enforcement footnote Option 2 (detailed) provides necessary detail to guide compliance and enforcement. Option 1 (concise) is inadequate for these purposes. We support incorporating Option 2 into each of the three Standards. Consumption of industrially produced trans-fatty acids (iTFAs) is harmful to humans, with small increases in intake leading to considerable increases in cardiovascular disease risk (2). The WHO considers iTFA reduction/elimination a “best buy” policy to address noncommunicable disease risk (3), and in 2018 called for iTFAs to be eliminated globally (1). WHO tracking of policies to address iTFAs in the food supply shows remarkable progress has been made (4). Over 60 countries around the world, including many low- and middle-income countries, have introduced a best practice iTFA policy (4). The evidence is clear – these policies have been readily implemented in a range of settings (5, 6). Where mandatory, they have proven effective, cost-effective and equity-enhancing, while voluntary efforts demonstrably lead to poorer outcomes (5). International experience confirms that food manufacturers have successfully reformulated under mandatory arrangements (6). Introducing these proposed revisions into the three Codex Standards will not only save hundreds of thousands of lives around the world. It will also support trade by setting a clear expectation against dumping of products containing iTFAs, and support competitiveness by reducing market distortion from information asymmetry and externalisation of costs caused by iTFAs. 1. World Health Organization. 2024. Countdown to 2023: WHO 5-year milestone report on global trans fat elimination 2023. 2. Mozaffarian D, et al. 2006. Trans Fatty Acids and Cardiovascular Disease. New England Journal of Medicine. 3. World Health Organization. 2024. Tackling NCDs: best buys and other recommended interventions for the prevention and control of noncommunicable diseases, 2nd edition. 4. World Health Organization. Global database on the Implementation of Food and Nutrition Action (GIFNA) - TFA Country Score Card. Accessed 14/01/2026. 5. Downs SM, et al. 2017. The Impact of Policies to Reduce trans Fat Consumption: A Systematic Review of the Evidence. Current Developments in Nutrition. 6. Resolve to Save Lives. 2022. Implementing And Enforcing Trans Fat Elimination Policies – Case Studies.	**World Federation of Public Health Associations**
WHO thanks the EWG Chairs for their efforts in coordinating the EWG discussion and putting together the recommendations. WHO would like to provide its comments on recommendations 7, 8 and 11 as follows.	**WHO**

COMMENT	MEMBER / OBSERVER
Recommendation 7 WHO proposes a new text (**Option C**) for consideration by CCFO29. This proposal builds on previous discussions of the EWG and responds to requests from Members for flexibility in implementation, while ensuring Codex standards clearly specify essential composition requirements for foods. Proposed change / Proposed text **Option A** EWG chairs' proposal Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: 1. Set a limit of industrially produced *trans*-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or 2. Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods **Option B** WHO's initial proposal (EWG round 2) Same text as Option A, with "shall" instead of "should". Competent national and/or regional authorities ~~**should**~~ **shall** implement mandatory legislative or regulatory measures to: 1. Set a limit of industrially produced *trans*-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or 2. Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods **New Option C** WHO's alternative proposal for CCFO29 Added the bold and underlined part. **The final product covered by the standard shall not contain PHO and/or exceed 2 grams of iTFA per 100 grams of total fat.** **To achieve this,** competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: 1. Set a limit of industrially produced *trans*-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or 2. Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods Rationale for proposing Option C During EWG Round 2, WHO proposed text aligned with **Option B**, reflecting WHO's recommendation that mandatory legislative or regulatory measures are the most effective means of eliminating iTFA, based on extensive country experience. That said, WHO recognizes that some Members have requested flexibility in how standards are implemented, as reflected in the project document. **Option A** (EWG chairs' proposal) accommodates this request by using the term *"should"*, allowing countries discretion in their approach, including voluntary strategies. While WHO's recommended approach (i.e. best-practice policy) is for countries to implement a mandatory legislation or regulation, in the spirit of compromise, WHO is prepared to accept this flexibility with respect to the approaches to implementation. However, Option A alone is insufficient to meet the stated objective of this work. The project document clearly indicates that the revision aims to include in CCFO standards a prohibition of PHO and/or limits on iTFA in foods. Option A addresses only the policy approach	

COMMENT	MEMBER / OBSERVER
("how" countries may act) and does not specify the essential composition of foods. i.e. the actual allowable level of iTFA in foods. This is a critical omission as it is the very subject of the section under discussion. The requested flexibility concerns how countries implement the standard, not what level of iTFA is acceptable in foods. The latter must be clearly defined as an essential composition. **Option C** resolves this gap by adding a clear essential composition requirement ("The final product covered by the standard shall not contain PHO and/or exceed 2 grams of iTFA per 100 grams of total fat."). The use of *"shall"* here is appropriate and consistent with Codex practice for essential composition provisions (e.g. in CXS 256-1999 fat spreads and blended spreads standard has as a provision in the essential composition section "3.1.1.2 The fat content shall be as follows: …"). The additional sentence refers to products covered by the standard, aligned with the scope of the standards under discussion. Additionally, it refers to the final products (not ingredients) so it gives the flexibility allowed within the two best practice policies. Finally, the second part of Option C retains the EWG Chairs' text as is, which provides recommended policy approaches in order to achieve the required essential composition (i.e. best-practice policies for all foods). If CCFO were to adopt Option A alone, the impact of these CCFO standards will be minimal on both public health and trade harmonization. The text would merely reflect the current situation where countries with best-practice policies would maintain them, while countries without any regulation could continue without action. As a result, populations in countries without regulations (predominantly low-income countries) would remain unprotected from this toxic compound, perpetuating existing global health disparity. Clearly defined essential composition as in Option C supports fair and harmonized international trade by reducing unnecessary regulatory divergence and technical barriers to trade, and enhancing transparency and trust among trading partners. In the absence of harmonized limits, unsafe products may preferentially flow to countries with weaker regulations, distorting trade patterns and undermining fair trade practices. The next session CCFO30 will have marked 10 years since the launch of the WHO's REPLACE initiative in 2018. And it will have been 25 years since Denmark first introduced their regulation in 2003. While approximately 60 countries have implemented best-practice policies thus far, progress has stalled lately, and half of the world's population remains unprotected. Accelerating action on iTFA elimination is one of the most cost-effective and achievable measures to reduce the global burden of noncommunicable diseases. In a number of countries, despite initial discussions on best-practice TFA policies, the additional impetus required to advance these efforts toward adoption has been lacking. Policymakers have often required additional reinforcement and support to maintain momentum and to ensure that TFA elimination becomes and remains a priority within national agendas. Strong Codex standards would provide this essential support, helping to catalyze policy progress and implementation. WHO strongly encourages CCFO to consider Option C, which strikes an appropriate balance between implementation flexibility and the need for clear compositional requirement. This approach allows Codex to fulfill its commitment to public health protection and trade harmonization. WHO sincerely hopes that Codex/CCFO will make meaningful contribution envisioned when this work was initiated two years ago and help accelerate global action to eliminate iTFA. ***Additional note – Option D:** In Option C above, the additional sentence ("The final product covered by the standard shall not contain PHO and/or exceed 2 grams of iTFA per 100 grams of total fat.") includes both the absence of PHO and an iTFA limit. This was intended to accommodate the two best-practice policy approaches. However, if members could agree that a 2% iTFA limit alone is sufficient as the essential composition requirement, this would significantly simplify the provision, further contributing to trade harmonization, and therefore Option D is our most preferred approach (see **Option D** below).	

COMMENT	MEMBER / OBSERVER
Notably, during EWG Round 1, many countries, including those that have already implemented PHO bans, supported the 2% iTFA limit as an essential composition requirement, as noted in the Working Document 2 (WD2) prepared by EWG chairs. This approach is technically sensible because, in practice, banning PHO results in only non-PHO iTFA being present, typically at levels around 2%. Thus, in terms of the final iTFA content of foods, a PHO ban leads to an outcome that is effectively equivalent to an iTFA limit of 2%. Adopting only the 2% iTFA limit as the essential composition would also simplify the response to Recommendation #11. Compliance would need to be verified solely against the iTFA limit, which may be more amenable to enforcement particularly in a trade context, because iTFA levels can be measured in the final product. This is generally more practical than relying primarily on documentation checks, as would be the case for a PHO ban. **Option D**: "**The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat.** **To achieve this,** competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: 1. Set a limit of industrially produced *trans*-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or 2. Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods" Recommendation 8 WHO understands the intent to clarify the terms "hydrogenation" and "hydrogenated" in CCFO standards. From a technical perspective though, the term hydrogenation already covers both partial and full hydrogenation, by definition. Therefore, a clarifying footnote is unnecessary. If a clarifying note is nevertheless retained across the three standards, WHO suggests amendment to the clarifying footnote because the proposed text in recommendation 8 that emphasizes national or regional legislative discretion may undermine its public health intent. WHO suggests changing the footnote as follows to align with our proposal for recommendation 7 above. **<Suggested amendment to the footnote>** • If the Committee agrees with Option C "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.~~" **As provided in the essential composition section, the final product covered by the standard shall not contain PHO and/or exceed 2 grams of iTFA per 100 grams of total fat.** • If the Committee agrees with Option D – **preferred** "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.~~" **As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat.** Recommendation 11 • If the Committee agrees with Option C	

COMMENT	MEMBER / OBSERVER
We believe Footnote Option 2 (Detailed) provides clarity of the compliance verification approaches that vary between the two policy options (both i and ii needed). • If the Committee agrees with Option D – **preferred** As mentioned above under "* Additional note (Option D)", Footnote Option 2 (Detailed) is still preferred, but we can simplify the provision as we would only need the first bullet "i" for the iTFA limit. We would not need the second bullet "ii" for the PHO prohibition.	

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
PROPOSED DRAFT REVISIONS TO THE *STANDARD FOR EDIBLE FATS AND OILS NOT COVERED BY INDIVIDUAL STANDARDS* (CXS 19-1981)	
1. SCOPE	
hydrogenation Comment: Kenya supports the inclusion of hydrogenation in the scope and the accompanying explanation provided in the footnote. Justification: Hydrogenation is one of the modification processes applied in the processing of fats and oils and can lead to formation of trans fatty acids.	**Kenya**
hydrogenation Recommendation 8: Malaysia is of the view that there is no need to include a clarifying footnote on hydrogenation. However, if a definition is considered necessary, Malaysia proposes that the second sentence be removed, as it primarily states the public health objective.	**Malaysia**
hydrogenation Including, within a single note, both the intent to clarify that the term "hydrogenation" encompasses both full hydrogenation and partial hydrogenation, and the intent to avoid any interpretation that the use of partially hydrogenated oils, where permitted, is positively regarded by competent national and/or regional authorities, may risk hindering an accurate understanding of the purpose of the note. The purpose of this note appears to be to clarify the meaning of the term "hydrogenation." In this context, it may be sufficient to explain that hydrogenation can refer to either full or partial hydrogenation. References to national or regional regulatory approaches and global public health objectives may be more appropriately addressed elsewhere, rather than in a terminology note. Accordingly, Japan proposes to retain only: "The term 'hydrogenation' may refer to either full or partial hydrogenation."	**Japan**
hydrogenation Paraguay apoya la inclusión de la hidrogenación dentro del alcance de las normas del Codex de grasas y aceites en revision, porque es una decisión estratégica que alinea la política de salud pública nacional con las metas globales de la Organización Mundial de la Salud (OMS).	**Paraguay**
Footnote i. Brazil would like to suggest excluding the note i with the explanation for hydrogenation. The first part of the note is not essential for the context of the standard and the second part should be added to the definition of industrial trans fatty acids (iTFA) on item 2. Descriptions. The alternatives are already included on item 3.	**Brazil**
Footnote i. We recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: 'The term "hydrogenation" may refer to either full or partial hydrogenation. As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat.' Standards must avoid unnecessary clarification that may weaken the objectives of these revisions, the intent to improve clarity and consistency in the use of the terms "hydrogenation" and "hydrogenated" across Codex fats and oils standards is understood. From a technical standpoint, however, the term "hydrogenation" already encompasses both partial and full hydrogenation. The additional clarification as currently proposed is therefore unnecessary and risks diverting attention from the primary public health objective of eliminating iTFA from the food supply.	**International Association of Consumer Food Organizations**

COMMENT	MEMBER / OBSERVER
In particular, clarification language that emphasizes national or regional legislative discretion may inadvertently weaken the primary objective of the proposed revisions, namely the elimination of iTFA from the food supply. Care should be taken to ensure that any additional explanatory text does not shift focus away from the substantive requirements of the standard or create interpretive pathways that undermine its public health intent.	
Footnote i. For the proposed footnotes (footnotes number 1, 4 and 8) on hydrogenation/hydrogenated (recommendation 8), we recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term “hydrogenation” may refer to either full or partial hydrogenation. As provided in this standard, [add final new language from section 3].	**Coalition for Americas' Health**
Footnote i. We recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term “hydrogenation” may refer to either full or partial hydrogenation. As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. Standards must avoid unnecessary clarification that may weaken the objectives of these revisions, the intent to improve clarity and consistency in the use of the terms “hydrogenation” and “hydrogenated” across Codex fats and oils standards is understood. From a technical standpoint, however, the term “hydrogenation” already encompasses both partial and full hydrogenation. The additional clarification as currently proposed is therefore unnecessary and risks diverting attention from the primary public health objective of eliminating iTFA from the food supply. In particular, clarification language that emphasizes national or regional legislative discretion may inadvertently weaken the primary objective of the proposed revisions, namely the elimination of iTFA from the food supply. Care should be taken to ensure that any additional explanatory text does not shift focus away from the substantive requirements of the standard or create interpretive pathways that undermine its public health intent.	**World Public Health Nutrition Association**
Footnote i. Kenya supports the draft as provided by the EWG.	**Kenya**
Footnote 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.~~ Indonesia supports the inclusion of a clarifying footnote. However, Indonesia is of the view that the clarification text within the standard should focus solely on the scientific explanation of the terms 'hydrogenation' or 'hydrogenated'. Consequently, the second sentence ('this reflects...') should be removed, as it is not directly related to the technical provisions of the standard. The second sentence serves more as a justification for the revision of the standard, which has already been addressed in the project document.	**Indonesia**
Footnote i. Paraguay, está de acuerdo con la propuesta de incluir el pie de página, ya que la terminología aclara la aplicación coherente por las distintas instituciones regulatorias.	**Paraguay**
Footnote i. El término «hidrogenación» puede referirse a la hidrogenación total o ~~parcial, según lo establecido~~ parcial (cuando sea permitido en la legislación o normativa nacional y/o ~~regional~~regional). Esto refleja el objetivo de salud pública	**Costa Rica**

COMMENT	MEMBER / OBSERVER
<u>mundial de eliminar los ácidos grasos *trans* producidos industrialmente (AGTi) del suministro alimentario, mediante el establecimiento de un límite obligatorio de no más de 2 gramos de AGTi por cada 100 gramos de grasa total en todos los alimentos, y/o prohibiendo la producción y el uso de grasas y aceites parcialmente hidrogenados en todos los alimentos.</u> La nota aclaratoria sobre la hidrogenación, tal como se propone, es conforme con las buenas prácticas de la OMS, sólo se sugiere un ajuste para evitar confusión, que consiste en colocar entre paréntesis la frase "cuando sea permitido en virtud de la legislación o la normativa nacional o regional" seguido de la palabra "parcial", de manera que se entienda que algunos países permitirían los APH.	
2. DESCRIPTIONS	
Recommendation 1: Malaysia has no objection to the proposed EWG recommendation to include the proposed definitions within “Section 2: Descriptions” for all three standards and introduce two subsections within Section 2.	**Malaysia**
For the proposed footnotes on hydrogenation/hydrogenated (recommendation 8), we recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term “hydrogenation” may refer to either full or partial hydrogenation. As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat.	**The Healthy Caribbean Coalition**
Placement of definitions. Canada supports placing the proposed definitions in Section 2 (“Descriptions”) and introducing subsections “2.1 Product definitions” and “2.2 Other definitions” to all three targeted standards, for clarity and consistency.	**Canada**
<u>2.1 Product definitions</u> Kenya supports inclusion of the definitions as proposed by the working group. This is consistent with the guidance of the Codex Procedural Manual, Section 2.6, Paragraph 90.	**Kenya**
<u>2.1 Definiciones de los productos</u> Se considera adecuado que en las definiciones de productos se determinan aspectos básicos sobre las grasas en general, tales como su origen, las características que las hace “vírgenes” y los procesos de extracción.	**Ecuador**
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. Change capital letter ‘P’ to small letter ‘p’.	**Food Industry Asia**
Se entiende por ***grasas y aceites prensados en frío*** … a) Las definiciones deberían ubicarse en la norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981), por ser más general evitando la repetición de definiciones extensas para facilitar su actualización y garantizar consistencia con el enfoque empleado generalmente en los textos del Codex. Se propone colocar una referencia en las normas para grasas animales especificadas (CXS 211-1999) y grasas para untar y mezclas de grasas para untar (CXS 256-1999), de forma	**Guatemala**

COMMENT	MEMBER / OBSERVER
que se lea así: 2.2.1 A los efectos de la presente norma, serán de aplicación las definiciones de aceites y grasas parcialmente hidrogenados (APH), aceites y grasas totalmente hidrogenados (ATH) y ácidos grasos trans producidos industrialmente (AGTi) establecidas en la Norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981) b) Se apoya las subsecciones «2.1 Definiciones de los productos» y «2.2 Otras definiciones» para separar las descripciones de los productos.	
Fully hydrogenated fats and oils **(FHO)** We encourage Members to suggest revisions to the definition of "fully hydrogenated fats and oils" to reflect that full hydrogenation converts nearly all unsaturated bonds, resulting in an almost fully saturated fat structure, in order to improve technical accuracy and avoid potential misinterpretation in implementation.	**International Association of Consumer Food Organizations**
Fully hydrogenated fats and oils **(FHO)** Kenya proposes an editorial amendment to the definition to read: 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 in the presence of a catalyst.	**Kenya**
Fully hydrogenated fats and oils **(FHO)** We encourage Members to suggest revisions to the definition of "fully hydrogenated fats and oils" to reflect that full hydrogenation converts nearly all unsaturated bonds, resulting in an almost fully saturated fat structure, in order to improve technical accuracy and avoid potential misinterpretation in implementation.	**World Public Health Nutrition Association**
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~~negligible. 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.** Indonesia proposes replacing the word 'minimized' in the third sentence with 'negligible'. Indonesia considers the term 'minimized' potentially misleading, as it implies reduction rather than the outcome of full hydrogenation. In our view, 'negligible' is the more appropriate term, as complete hydrogenation effectively prevents iTFA formation. This change ensures better clarity regarding the full hydrogenation process in the context of global public health goals.	**Indonesia**
Fully hydrogenated fats and oils **(FHO)** Recommendation 3: Definition of 'fully hydrogenated fats and oils'. Canada supports the proposed definition, as drafted. It clearly distinguishes FHO from PHO and reflects their compositional and functional characteristics	**Canada**
Fully hydrogenated fats and oils **(FHO)** Recommendation 3: Malaysia suggests that the definition should focus only on clearly describing what constitutes FHO, without including detailed explanations of the hydrogenation process, chemical mechanisms or the formation of trans-fatty acids.	**Malaysia**

COMMENT	MEMBER / OBSERVER
Fully hydrogenated fats and oils **(FHO) are produced through a chemical process in which hydrogen is added to all the carbon-carbon 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.** In the first sentence, Thailand proposes using the term "carbon–carbon double bonds" instead of "double bonds" to specify the type of double bonds involved in the hydrogenation process and to align with the definition of "trans-fatty acids" in CXG 2-1985, which uses this terminology.	**Thailand**
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.~~** Brazil suggest deleting the last sentence of the proposed definition because being predominantly solid at room temperature is also a characteristic of partially hydrogenated fats and oils and is not essential for the definition: 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. Brazil would like to suggest excluding the note i with the explanation for hydrogenation. The first part of the note is not essential for the context of the standard and the second part should be added to the definition of industrial trans fatty acids (iTFA) on item 2. Descriptions, in order to in to give greater prominence to alternatives for reducing industrial trans fatty acids.	**Brazil**
Fully hydrogenated fats and oils **(FHO) are produced through a chemical process in which hydrogen is added to virtually all the double bonds in unsaturated fats and oils, using a catalyst. This process converts virtually 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.** Under the current wording, the definition may be interpreted as requiring 100% saturation for fats and oils to qualify as fully hydrogenated. In practice, however, complete conversion of all unsaturated bonds and analytical confirmation of absolute 100% saturation are technically difficult. While the use of terms such as "nearly" or "almost" may introduce ambiguity and blur the distinction from partially hydrogenated oils (PHO), the addition of terms such as "virtually" or "theoretically" would better reflect industrial and analytical realities without introducing subjective interpretation.	**Japan**
Fully hydrogenated fats and oils **(FHO)** Paraguay está de acuerdo con la inclusión de la definición propuesta, en el entendimiento de que este enfoque aporta consistencia y claridad al documento.	**Paraguay**

COMMENT	MEMBER / OBSERVER
Las grasas y aceites totalmente hidrogenados **(ATH) se producen mediante ~~un proceso químico~~ una reacción química en el que se ~~añade~~ adiciona hidrógeno a ~~todos~~ los dobles enlaces de las grasas y aceites insaturados, utilizando un catalizador. Este proceso convierte ~~todos~~ los enlaces insaturados en enlaces simples saturados, ~~lo que da como resultado una estructura grasa totalmente saturada. Dado que~~ minimizando la ~~hidrogenación es completa, se reduce al mínimo la~~ formación de ácidos grasos *trans* producidos industrialmente (AGTi). Las grasas y aceites resultantes suelen ser sólidos o semisólidos a temperatura ambiente debido a su punto de fusión más elevado y presentan una mayor estabilidad y resistencia a la oxidación.** La definición tal como se propone es idónea para fines de inclusión/ referencia en las normas específicas del CCFO, no obtante, se proponen ajustes para fines de claridad y simplificación.	**Costa Rica**
Las grasas y aceites totalmente hidrogenados **(ATH)** La definición propuesta es técnicamente coherente y esencial para la convergencia normativa con las metas de la OMS. Al centrarse en la saturación total de los enlaces dobles, proporciona una base legal clara para el cumplimiento por parte de la industria y una protección efectiva para la salud del consumidor. No obstante, el consumo de grasas saturadas no debe sobrepasar el 10% del total de calorías de la dieta, conforme con las Directrices de la OMS, pero constituyen un riesgo menor en comparación con los iTFA. Se considera pertinente que se señale que las grasas y aceites totalmente hidrogenados (FHO), cuando cumplen con las especificaciones establecidas y no contienen iTFA en cantidades significativas, no constituyen una fuente relevante de iTFA, a fin de evitar restricciones regulatorias innecesarias que no aportan beneficios adicionales en términos de salud pública.	**Ecuador**
Partially hydrogenated fats and oils **(PHO)** Kenya proposes the following definition. 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 in the presence of a catalyst, converting them into single bonds and increasing the level of saturation. 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, whose level may vary depending on processing conditions and the degree of hydrogenation. Justification: To bring clarity about the degree of hydrogenation considering that the TFA formation not only depends on the degree of hydrogenation but also processing conditions applied.	**Kenya**
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 industrially-produced *trans*-fatty acids, which may vary depending on the degree of hydrogenation.** This edit is consistent with the definition of fully hydrogenated fats and oils	**IDF/FIL**

COMMENT	MEMBER / OBSERVER
***Partially hydrogenated fats and oils* (PHO)** Recommendation 2: Definition of 'partially hydrogenated fats and oils'. Canada supports the proposed definition, as drafted. It is technically accurate and aligns with WHO guidance.	**Canada**
***Partially hydrogenated fats and oils* (PHO)** Recommendation 2: Malaysia suggests that the definition should focus only on clearly describing what constitutes PHO, without including detailed explanations of the hydrogenation process, chemical mechanisms or the formation of trans-fatty acids.	**Malaysia**
***Partially hydrogenated fats and oils* (PHO) are produced through a chemical process that adds hydrogen to some of carbon-carbon the double bonds in unsaturated fats and oils, using a catalyst. This converts those double bonds into single bonds, making the fat and oil 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.** 1.In the first sentence, Thailand proposes using the term "carbon–carbon double bonds" instead of "double bonds" to specify the type of double bonds involved in the hydrogenation process and to align with the definition of "trans-fatty acids" in CXG 2-1985, which uses this terminology 2.Thailand also notes that the hydrogenation process described in the first sentence applies to both fats and oils. Accordingly, for technical accuracy, it is proposed to insert the words "and oils" after the word "fats" in the second sentence.	**Thailand**
***Partially hydrogenated fats and oils* (PHO)** In line with the comments presented in the electronic working group, Brazil reiterates its position that the experience of other countries that already use the iodine value to define partially hydrogenated oils, an objective threshold between partially and fully hydrogenated fats and oils is useful, and the use of the iodine value (≥ 4 for partially hydrogenated fats and oils) makes this distinction clearer. Classifying a vegetable oil or fat as partially hydrogenated requires the definition of two criteria: it must have undergone the hydrogenation process and present an iodine value greater than 4. This definition has been used by Brazil since 2019, with no issues identified to date. It is worth noting that the same parameter is also used by other countries. In this context, we would like to suggest the following wording: 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. Hydrogenated fats and oils with iodine value greater than 4 (four) are considered partially hydrogenated.	**Brazil**

COMMENT	MEMBER / OBSERVER
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.** To avoid implying a conceptual contrast such as natural/artificial or natural/unnatural, the term “natural” is not necessary. Both cis and trans configurations can occur naturally in fats and oils.	**Japan**
Partially hydrogenated fats and oils **(PHO)** FIA proposed amendment of PHO as below: 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 industrially-produced trans fatty acids, which may vary depending on the degree of hydrogenation. The proposed changes is to ensure consistent clarity.	**Food Industry Asia**
Partially hydrogenated fats and oils **(PHO)** Paraguay está de acuerdo con la inclusión de la definición propuesta, en el raciocinio de que esta definición aporta a la diferenciación entre los tipos de grasas y aceites acompañando el crecimiento industrial, dando así, mayor claridad al documento.	**Paraguay**
Las grasas y aceites parcialmente hidrogenados **(APH) se producen mediante ~~un proceso químico en el~~ una reacción química que ~~se añade~~ adiciona hidrógeno a ~~algunos de~~ los dobles enlaces de las grasas y aceites insaturados, utilizando un catalizador, sin llegar a la saturación total. Esto convierte esos dobles enlaces en enlaces simples, lo que hace que la grasa sea más saturada. Durante este proceso, algunos de los dobles enlaces restantes sufren una isomerización geométrica, pasando de la configuración cis ~~natural~~ original a la configuración trans dando lugar a la formación de ácidos grasos trans, que pueden variar en función del grado de hidrogenación. El control del proceso permite crear grasas y aceites con una amplia gama de propiedades físicas, como la textura y el punto de fusión, independientemente de la composición original del ~~aceite. También da lugar a la formación de ácidos grasos~~ aceite o grasa.~~*trans*, que pueden variar en función del grado de hidrogenación.~~** La definición tal como se propone es clara, sin embargo, se proponen ajustes para mejorar su precisión técnica.	**Costa Rica**
Las grasas y aceites parcialmente hidrogenados **(APH)** Se recomienda mantener este nivel de detalle en la redacción del texto, ya que permite a las autoridades sanitarias nacionales identificar y regular específicamente los PHO como la fuente principal de iTFA industriales, facilitando la armonización con las directrices de la OMS para su eliminación global. Además, el término "aceite" suele asociarse a estados líquidos a temperatura ambiental que se caracterizan por tener mayor contenido de ácidos grasos insaturados; mientras que las grasas en cambio, son sólidas y tienen mayor contenido de ácidos grasos	**Ecuador**

COMMENT	MEMBER / OBSERVER
saturados. De esta forma, al incluirse tanto aceites como grasas en la definición, se previenen vacíos legales que podrían presentarse cuando se trate de aplicar la normativa a un producto que se considere técnicamente como grasa. La conservación de las siglas originales correspondería a una medida práctica por el conocimiento de estos términos en la nomenclatura internacional, pero no tiene implicaciones mayores una vez que se cuente con la definición establecida. Se sugiere que, cuando se haga referencia general a "ácidos grasos trans (AGT)" en el texto normativo, se precise explícitamente cuando corresponda si se trata de AGT totales o de AGT producidos industrialmente (iTFA), a fin de evitar interpretaciones regulatorias que puedan afectar productos que contienen AGT de origen natural en niveles bajos y no asociados a riesgo poblacional significativo, conforme a la evidencia científica actual de la OMS	
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 cannot be chemically ~~distinguished~~ distinguished, based on currently available analytical methods, either naturally occurring trans fats or trans fats derived from ~~other TFA~~ruminants.** This version: Avoids ambiguity about "other", clearly separates natural occurrence and ruminant origin and keeps a conservative, standards-style tone suitable for technical or regulatory texts	**Uruguay**
Industrially produced trans-fatty acids (iTFA) Kenya proposes an editorial amendment to the definition to read: Kenya proposes the definition to read: 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.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 cannot be chemically distinguished from other TFAs.	**Kenya**
Industrially produced trans-fatty acids (iTFA) **are *trans*-fatty acids ~~obtained through~~ formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization. iTFA are not naturally produced and defined solely by their method of production.~~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 cannot be chemically distinguished from other TFA.~~** The revised draft definition of iTFA provided in CX/FO 26/29/5 has not been incorporated into the draft text of the standard. Edits were made to aligned with the revised draft definition of iTFA provided in CX/FO 26/29/5. IDF would like to suggest the indicated additions to the revised draft definition of iTFA provided in CX/FO 26/29/5. We consider it important to keep the definition focused and to avoid including analytical aspects, as these do not necessarily fit within a definition and may change over time. Any evolution in analytical methods could quickly render such references incorrect. For this reason, we propose deleting the phrase "are difficult to chemically distinguish from naturally occurring TFA." Instead, the definition should emphasize the essential point: iTFA are not naturally produced, unlike ruminant TFA. This is why we propose adding the wording "are not naturally produced."	**IDF/FIL**

COMMENT	MEMBER / OBSERVER
Industrially produced trans-fatty acids (iTFA) Recommendation 4: In view that deodorization is usually carried out as part of oil refining, Malaysia proposes the following changes to the definition of iTFA: "Industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining. iTFA are defined solely by their method of production and are difficult to chemically distinguish from naturally occurring TFA."	**Malaysia**
Industrially produced trans-fatty acids (iTFA) Recommendation 5: Referral to CCNFSDU to revise definition of 'trans-fatty acids'. Canada supports referring this matter to CCNFSDU to ensure global consistency and alignment with WHO definitions, while considering implications for nutrition labelling.	**Canada**
Industrially produced trans-fatty acids (iTFA) Recommendation 4: Definition of 'industrially produced trans-fatty acids'. Canada supports the proposed definition as drafted, and agrees that explicit exclusion of ruminant TFA is unnecessary since "industrially produced" implies this distinction.	**Canada**
Industrially produced trans-fatty acids (iTFA) National Position on the iTFA Limit of 2 %: We support the proposal to set a maximum limit of 2 % industrially produced trans-fatty acids (iTFA) per 100 g of total fat in all foods. • National Position on the Complete Ban of Partially Hydrogenated Oils (PHO): We agree with the proposal to prohibit the production and use of partially hydrogenated oils (PHO) in all foods. This measure aligns with the Gulf Cooperation Council (GCC) standards, which have already taken steps to restrict or eliminate PHO usage due to its role in generating harmful trans fats. This prohibition is an important public health measure that contributes to the reduction of cardiovascular diseases. • Approval of the Proposed Revisions and Clarity for National Implementation: We agree with the proposed revisions to the Codex standard. The revisions are clear, and we believe they are feasible for national implementation. • Between the Three Standards and Definitions: The definitions of FHO, PHO, and iTFA appear to be harmonized across the three standards, which is desirable for consistency. However, minor editorial adjustments may be considered to avoid unnecessary duplication and ensure that the terms are applied consistently without repetition across the standards. Streamlining the language used could enhance the clarity and effectiveness of these definitions.	**Qatar**
Industrially produced trans-fatty acids (iTFA) In line with the comments presented in the electronic working group, Brazil suggests replacing "cannot be" by "difficult to" in the definition, considering that chemically speaking, it is known that: a) ruminant trans fatty acids main fatty acids are vaccenic acid (18:1Δ11t) in amounts of 30 to 50%,16:1 fatty acids around 20% and the presence of conjugated linolenic acid (CLA); b) industrial trans fatty acids from vegetable origin are characterized by presence of 20-30% of trans fatty acids 18:1; c) industrial trans fatty acids from marine origin are characterized by the presence of C20:1 and C22:1 trans isomers. So, they are difficult but not impossible to distinguish.	**Brazil**

COMMENT	MEMBER / OBSERVER
Moreover, Brazil suggests that part of the content of the note for hydrogenation in item 1 should be added to this definition in order to give greater prominence to the need to eliminate iTFA from the food supply.The alternatives are already included on item 3. In this context, we would like to suggest the following wording: 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 chemically distinguished from other TFA. There is a global public health objective of eliminating industrially produced trans-fatty acids (iTFA) from the food supply. As an alternative, the last sentence can be deleted without prejudice to the understanding.	
Industrially produced trans-fatty acids (iTFA) FIA noted that this definition does not align with what has been circulated in CX/FO 26/29/5: “industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to chemically distinguish from naturally occurring TFA”. Based on the CX/FO 26/29/5 definition, FIA would like to suggest two amendments for iTFA definition as below: “industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to simply chemically distinguish from naturally occurring ruminant TFA”.	**Food Industry Asia**
Industrially produced trans-fatty acids (iTFA) Paraguay está de acuerdo con la inclusión de la definición propuesta , en el entendimiento que el término es ampliamente utilizado y, en ese sentido compartimos lo mencionado en el EWG en la importancia de la revisión de la CXG 2 -1985 , donde se encuentra una definición amplia de los TFA y la diferenciación aportaría comprensibilidad a los textos.	**Paraguay**
Los ácidos grasos trans producidos industrialmente (AGTi) La definición tal como se propone es clara, precisa e idónea para fines de inclusión/ referencia en las normas específicas del CCFO.	**Costa Rica**
Los ácidos grasos trans producidos industrialmente (AGTi) Se concuerda con la distinción centrada en el método de producción a nivel industrial y la imposibilidad de distinguirlos de los TFA de origen animal (vacuno) a nivel de laboratorio, aspectos que resultan fundamentales para el desarrollo de herramientas regulatorias, en específico para la determinación de métodos de control y vigilancia del cumplimiento normativo. Al incluir los ácidos grasos trans generados por refinación/desodorización, la norma cubre todas las posibles fuentes de generación de iTFA.	**Ecuador**
Los ácidos grasos trans producidos industrialmente (AGTi) **son ácidos grasos *trans* obtenidos mediante procesos industriales, formados principalmente durante la hidrogenación parcial de grasas y aceites insaturados, aunque también pueden producirse en cantidades menores durante otros procesos industriales, como el refinado y la desodorización del**	**Argentina**

COMMENT	MEMBER / OBSERVER
aceite. Los AGTi se definen únicamente por su método de producción y no pueden distinguirse químicamente de ~~otros AGT~~los AGTr. Se propone modificar la última frase del párrafo de la siguiente manera: "Los AGTi se definen únicamente por su método de producción y no pueden distinguirse químicamente de los AGTr", dado que los "otros AGT" son los ácidos grasos trans de origen natural provenientes de rumiantes.	
3. ESSENTIAL COMPOSITION AND QUALITY FACTORS	
Uruguay considers option 2 of the footnote with the suggested modifications to be better. And in option a) and b) of the footnote Uruguay considers that the term “should” is more appropriate than “shall”, as the provision is intended to be recommendatory rather than mandatory.	**Uruguay**
Kenya supports the proposed placement of the provision to prohibit partially hydrogenated oils (PHOs) and/or restrict industrially produced trans fatty acids (iTFAs) under the Essential Composition and Quality Factors section, as recommended by the Electronic Working Group. Kenya considers this placement to be appropriate and consistent with Codex principles, as it clearly establishes the compositional and quality requirements of fats and oils to ensure consumer health protection. With regard to the current draft wording of the proposed provision, Kenya is of the view that: a) the statement is clear and aligned with WHO best practices. Recognizing that Codex texts constitute recommendations to governments, Kenya considers that adoption of this provision by Members would provide the necessary impetus for national implementation and enforcement. In this regard, Kenya proposes that the Committee recommend consideration and adoption of the text, as appropriate, by relevant Codex Committees and within applicable commodity standards, in order to facilitate implementation across foods and support global public health objectives; b) in the context of the provision, the use of the term “should” is appropriate, as it provides a strong recommendation on the action to be taken without rendering the provision mandatory at Codex level; and c) Kenya supports the proposal to refer to the Codex definition of food, as this ensures clarity and consistency across Codex texts.	**Kenya**
Republic of Korea is of the view that revising the three CODEX standards to set the limit of trans-fatty acids for “all foods” is beyond the scope of CCFO and requires sufficient discussion with other Committees. In addition, since Section 3 is about essential composition and quality factors, it seems unnecessary to include the mandatory legal matters.	**Republic of Korea**
Recommendation 6: Malaysia has no objection to the EWG recommendation on the placement of the provision to prohibit PHO and/or restrict iTFA, as this is consistent with the structure set out in the Codex Procedural Manual.	**Malaysia**
Brazil would like to suggest the following wording to item b to make it clearer: b) prohibit the production, import, use and supply of partially hydrogenated oils and fats for use in food and of foods formulated with these ingredients.	**Brazil**

COMMENT	MEMBER / OBSERVER
Paraguay se encuentra con la implementación de la Reglamentación Nacional de Grasas Trans , donde el límite propuesto es el establecido en este item, por lo cual estamos de acuerdo y conforme al paquete técnico Replace , Paraguay apoya la propuesta de que ambas opciones queden en la norma.	**Paraguay**
se sugiere que el texto refleje con mayor claridad la posibilidad de implementar ambas medidas (a y b) de forma simultánea. El Programa de Validación de la OMS para la Eliminación de Grasas Trans, como lo indica la CL 2025/79 – FO, establece tres vías para las políticas de "mejores prácticas": 1. Límite obligatorio del 2% de iTFA sobre la grasa total. 2. Prohibición obligatoria de la producción y uso de aceites parcialmente hidrogenados (PHO). 3. Una combinación de ambas medidas. Actualmente, países de la región como Argentina, Brasil, Colombia, México y Perú ya implementan este enfoque dual con éxito. Por lo tanto, Ecuador recomienda que la redacción del Codex incluya explícitamente esta tercera opción. Esto permitirá que los países se acojan a la normativa del Codex Alimentarius para facilitar el proceso de desarrollo e implementación de sistemas regulatorios fortalecidos y rigurosos, sin perjuicio de que otros Estados opten inicialmente por una de las dos herramientas regulatorias. Sin que ello implique gestiones adicionales, ya que los países deberán cumplir de todas formas con los trámites internacionales establecidos por la OMC y otras instancias regionales, previo a la emisión de sus regulaciones Se considera importante que el texto normativo reconozca que la eliminación de los ácidos grasos trans producidos industrialmente (iTFA) no debe dar lugar a sustituciones que incrementen de manera significativa el contenido de grasas saturadas en los alimentos, y que se promueva el uso de alternativas que contribuyan a mejorar el perfil lipídico global del producto. En este contexto, se sugiere reconocer la reformulación progresiva de los productos como una herramienta técnica válida para facilitar la eliminación de iTFA, particularmente en alimentos procesados complejos, siempre que se mantenga el cumplimiento de los límites establecidos y se proteja la calidad e inocuidad del producto.	**Ecuador**
Argentina propone que, a continuación de los puntos a) y b), se agregue la siguiente frase: "Además, las autoridades nacionales otorgarán un plazo razonable para la adecuación de los alimentos al límite establecido de AGTi y para la eliminación del uso de APH".	**Argentina**
Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: For Section 3 of the revised standards (recommendation 7) we encourage Members to suggest the use of “shall” rather than “should” in the provision on iTFA limits and/or PHO prohibitions, consistent with Codex drafting practice for essential compositional requirements and to ensure clear definition of product conformance. We recommend the revisions (in quotation marks) to strengthen the specificity and clarity of this provision, while retaining the EWG Chairs’ text that allows flexibility in the approaches: "The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: • Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or • Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods"	**International Association of Consumer Food Organizations**

COMMENT	MEMBER / OBSERVER
The inclusion of a provision recommending mandatory legislative or regulatory measures to limit iTFA and/or prohibiting PHO is strongly recommended. This approach is in line with WHO's REPLACE action package and reflects best practice regulatory measures already implemented in over 60 countries. Recommending mandatory measures to regulate iTFA also supports Codex's mandate of harmonizing international trade while protecting consumer health across countries. The effectiveness and clarity of this provision can be significantly strengthened by replacing "should" with "shall". In Codex standards, "shall" is routinely used to define essential compositional and quality requirements for product conformance. An iTFA limit and/or a prohibition of PHO is intended to establish product conformance with the standard, rather than merely provide implementation guidance. The use of "shall" would therefore align with established Codex drafting practice, including within the three standards under revision. While retaining "should" as currently proposed would weaken clarity and undermine harmonization. It is also important to note that the use of "shall" does not alter the voluntary nature of Codex standards. Codex texts remain voluntary in their adoption by Members, while the use of normative language provides clarity regarding the content of the standard itself. Clear, normative drafting supports consistent interpretation and application across jurisdictions and strengthens the harmonizing function of Codex standards.	
Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Suggested changes to the text and explanation: The inclusion of a provision recommending mandatory legislative or regulatory measures to limit iTFA and/or prohibiting PHO is strongly recommended. This approach is in line with WHO's REPLACE action package and reflects best practice regulatory measures already implemented in over 60 countries. Recommending mandatory measures to regulate iTFA also supports Codex's mandate of harmonizing international trade while protecting consumer health across countries. The effectiveness and clarity of this provision can be significantly strengthened by replacing "should" with "shall". In Codex standards, "shall" is routinely used to define essential compositional and quality requirements for product conformance. An iTFA limit and/or a prohibition of PHO is intended to establish product conformance with the standard, rather than merely provide implementation guidance. The use of "shall" would therefore align with established Codex drafting practice, including within the three standards under revision. While retaining "should" as currently proposed would weaken clarity and undermine harmonization. It is also important to note that the use of "shall" does not alter the voluntary nature of Codex standards. Codex texts remain voluntary in their adoption by Members, while the use of normative language provides clarity regarding the content of the standard itself. Clear, normative drafting supports consistent interpretation and application across jurisdictions and strengthens the harmonizing function of Codex standards. For this reason, for Section 3 of the revised standards (recommendation 7), we recommend adding the following wording (bolded) to strengthen the specificity and clarity of this provision, while retaining the EWG Chairs' text that allows flexibility in the approaches: The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods.	**Coalition for Americas' Health**
Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: The inclusion of a provision recommending mandatory legislative or regulatory measures to limit iTFA and/or prohibiting PHO is strongly recommended. This approach is in line with WHO's REPLACE action package and reflects best practice regulatory	**World Public Health Nutrition Association**

COMMENT	MEMBER / OBSERVER
measures already implemented in over 60 countries. Recommending mandatory measures to regulate iTFA also supports Codex's mandate of harmonizing international trade while protecting consumer health across countries.	
Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: We encourage Members to suggest the use of "shall" rather than "should" in the provision on iTFA limits and/or PHO prohibitions, consistent with Codex drafting practice for essential compositional requirements and to ensure clear definition of product conformance. We recommend adding the following wording to strengthen the specificity and clarity of this provision, while retaining the EWG Chairs' text that allows flexibility in the approaches: "The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, competent national and/or regional authorities should implement mandatory legislative or regulatory measures to:..." In Codex standards, "shall" is routinely used to define essential compositional and quality requirements for product conformance. An iTFA limit and/or a prohibition of PHO is intended to establish product conformance with the standard, rather than merely provide implementation guidance. The use of "shall" would therefore align with established Codex drafting practice, including within the three standards under revision. While retaining "should" as currently proposed would weaken clarity and undermine harmonization.	**World Public Health Nutrition Association**
Competent national and/or regional authorities ~~should implement mandatory legislative or regulatory measures to~~should: It is Indonesia's understanding that Codex standards and related texts are voluntary in nature. Consequently, including language implying that countries are required to implement mandatory legislative or regulatory measures may be inconsistent with the voluntary nature of Codex standards. Therefore, Indonesia proposes deleting the phrase 'implement mandatory legislative or regulatory measures to' in this text maintain consistency with Codex principles.	**Indonesia**
Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Regarding "Competent national and/or regional authorities " According to the Format for Codex Commodity Standards set out in Section 2.6 of the Codex Alimentarius Commission Procedural Manual (Thirtieth Edition), the section "Essential composition and quality factors" is intended to set out requirements related to composition and quality that are essential for defining the identity, designation, and quality of the product concerned. In light of this purpose, this section appears to be intended to specify requirements that are inherent to the product itself, such as compositional elements, identity characteristics, and quality factors, rather than to prescribe actions or measures to be taken by authorities. In general, commodity standards are designed to define what the product is, whereas provisions relating to the role of authorities or to implementation measures are more appropriately addressed through guidelines rather than through product standards. At the same time, Japan recognizes that the current work is a new work aimed at incorporating WHO best practices into these standards. If provisions related to regulatory implementation or enforcement are nevertheless to be included in this section, it would be more consistent with the format of the Procedural Manual for such provisions to be framed as product-based requirements, with "the product" as the subject, rather than referring implicitly or explicitly to actions by authorities. For example, the following wording could be considered:	**Japan**

COMMENT	MEMBER / OBSERVER
a) The product, in all foods, should not contain industrially produced trans-fatty acids (iTFA) in excess of 2 g per 100 g of total fat. b) The product, in all foods, should not be manufactured using partially hydrogenated fats and oils (PHO). Accordingly, the sentence in which the subject is competent national and/or regional authorities could be deleted. Such wording would better align with the purpose and scope of the "Essential composition and quality factors" section, while remaining consistent with the nature of Codex commodity standards.	
Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: We support the inclusion of a provision addressing limits on industrially produced trans-fatty acids (iTFA) and/or prohibitions on partially hydrogenated oils (PHO), in line with WHO's REPLACE action package and best practices already implemented by many Members. We recommend strengthening this provision by using "shall" rather than "should" to ensure clarity and consistency with Codex drafting practice. In Codex commodity standards, "shall" is routinely used in Section 3 (Essential Composition and Quality Factors) to define requirements for product conformance with the standard. An iTFA limit and/or a prohibition on PHO is intended to establish whether a product conforms to the standard, rather than to provide optional implementation guidance. Retaining "should" in this context risks weakening clarity and undermining the harmonizing function of the standard. The use of "shall" does not alter the voluntary nature of Codex standards, which remains established procedurally. Rather, it provides clear normative content for the standard itself, while preserving Members' flexibility in national implementation. Clear, normative drafting supports consistent interpretation and application across jurisdictions and facilitates harmonization in international trade. We also note that clarity at the Codex level is particularly important given the role of Codex standards as international reference points, including in WTO contexts. Ambiguous or overly flexible language may reduce the effectiveness of the standard and create uncertainty regarding product conformance. We therefore suggest the following wording for the proposed provision: **"The total amount of industrially produced trans-fatty acids (iTFA) in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, national and/or regional authorities should implement mandatory legislative or regulatory measures to: 1. Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or 2. Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods."** This approach aligns with existing Codex drafting practice by clearly defining compositional conformance within Section 3, while allowing flexibility for Members to determine the most appropriate national regulatory approach to achieve compliance.	**The Healthy Caribbean Coalition**
Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Regarding "implement mandatory legislative or regulatory measures to " This wording was not discussed within the EWG, and Japan therefore requests its deletion. In WD2, the Chair stated that, "Although one member proposed adding a phrase to explicitly recognize implementation flexibility, this is already implied by the use of 'should' in Codex texts." On that basis, comments were solicited on a draft provision without the	**Japan**

COMMENT	MEMBER / OBSERVER
above-mentioned wording. However, the subsequent addition of this wording is considered to undermine the balance between promoting global best practice and allowing for national and/or regional flexibility. Even without this wording, countries that need to further reduce TFA intake below the WHO recommended level would still be able to make effective use of the revised standard. For these reasons, and as noted in the preceding comment where Japan also proposed deletion of the sentence in its entirety, Japan considers that the wording should be deleted.	
Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: FIA support the objective of reducing iTFA intake. However, the inclusion of the word 'mandatory legislative or regulatory measures' goes beyond Codex's standard role. The standard should establish product characteristics rather than mandate national regulatory actions. FIA's proposed amendment to the statement: "Competent national and/or national authorities may adopt appropriate regulatory measures to:" This proposed revision maintains the public health objective and preserves regulatory flexibility to country authorities.	**Food Industry Asia**
~~**Las autoridades nacionales y/o regionales competentes deben aplicar medidas legislativas o reglamentarias obligatorias para:**~~Los productos cubiertos por la presente norma (sea cuando se utilicen como ingredientes en otros alimentos o bien para consumo directo), deben: Costa Rica apoya el objetivo de salud pública de la OMS para eliminar las grasas trans industriales (AGTi) del suministro mundial de alimentos. Sin embargo, se sugiere utilizar el lenguaje adecuado para una norma de producto Codex. Dada la naturaleza voluntaria del Codex, las normas deben establecer requisitos técnicos sobre el producto al que se refieren.	**Costa Rica**
Las autoridades nacionales y/o regionales competentes ~~**deben**~~ **deberían aplicar medidas legislativas o reglamentarias obligatorias para:**	**Argentina**
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 [2]; and/or Recommendation 7: a)TFA limit Malaysia proposes that the limit for industrially produced trans-fatty acids (iTFA) apply only to food intended for the final consumer or intended for supply to retail. This proposal aims to clarify the scope of application, noting that food additives are not considered within the definition of food for the purpose of iTFA limits. It is noted that, in the food additive industry, partially hydrogenated oils (PHO) are used in the manufacture of certain additives, such as emulsifiers (e.g. INS 471), due to their specific and necessary technological functions. Therefore, Malaysia proposes the wording to be amended as follows: "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 which is intended for the final consumer or intended for supply to retail; and/or"	**Malaysia**

COMMENT	MEMBER / OBSERVER
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 [2]; and/or 1. FIA proposed to just use the acronym. the acronym has already been explained in the definition. 2. FIA proposed amendment to this clause to "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 which is intended for the final consumer or intended for supply to retail ; and/or Justifications: i. This will be aligned with the gazetted maximum TFA limit under the Malaysia Food Regulations. ii. In EU, with reference to Regulations (EU) 2019/649, the maximum TFA limit is set for food for final consumer and food supplied to retail. iii. In EU, with reference to the EFSA' opinion on the re-evaluation of INS 471, EFSA panel noted that INS 471 can be manufactured from PHO and the TFA content in INS 471 ranged from 0.01 to 59.92%. However, the EFSA panel considered that there is no need to set a specific TFA limit for the emulsifier INS 471 since Regulations (EU) 2019/649 has established the maximum TFA limit in food for final consumer.	**Food Industry Asia**
Fixer une teneur maximale en acides gras *trans* industriels (AGTi) égale à 2 g pour 100 g de matières grasses totales dans toutes les denrées alimentaires[2] ; et/ou Cette paragraphe doit fixer les facteurs essentiels de composition et de qualité relatives aux produits concernés par cette norme. Par contre la proposition concerne des autres produits non concernés par le domaine d'application de cette norme.	**Tunisia**
~~**establecer un límite de ácidos grasos**~~ **contener *~~trans~~* ~~producidos industrialmente (AGTi) de~~ no más de 2 gramos de ácidos grasos trans producidos industrialmente (AGTi) por cada 100 gramos de grasa total ~~en todos los alimentos[2]~~ y/o** Es importante apegarse al Documento de Proyecto aprobado por la CAC, que en la Sección 3 inciso b) establece: "asegurarse de que el ámbito de aplicación de la prohibición y/o los límites ante mencionados abarque los productos de grasas y aceites utilizados como ingredientes en otros productos alimentarios, y considerar opciones de cumplimiento centradas en autorización para ingredientes en lugar de desafíos analíticos para diferenciar entre los AGTi en productos destinados al consumidor y los AGT para rumiantes". En ese sentido, Costa Rica considera que podría ser una inconsistencia hacer referencia a "todos los alimentos" si se trata de normas específicas. El Manual de Procedimiento establece claramente el Modelo de estructura de las normas del Codex sobre productos, donde se indica que el ámbito de aplicación deberá contener una declaración clara y concisa acerca del alimento o alimentos a los que se aplique la norma, por tanto, si hay una disposición que aplica a todos los alimentos esto debería estar claramente establecido en el ámbito de cada norma. Adicionalmente, el MP establece que la sección de "Factores esenciales relativos a la composición y la calidad" debe contener requisitos de composición y calidad del producto cubierto por esa norma, no de la totalidad de los alimentos. Es importante señalar que cuando un alimento elaborado utiliza grasas y aceites conformes con las normas del Codex, el perfil de grasa del ingrediente se refleja necesariamente en el producto final; en consecuencia, este también cumpliría con los límites establecidos.	**Costa Rica**

COMMENT	MEMBER / OBSERVER
Food" as defined in the *Codex Alimentarius Commission Procedural Manual*. Kenya supports the proposal by the EWG	**Kenya**
Food" as defined in the *Codex Alimentarius Commission Procedural Manual*. Missing additional quotation mark for "Food"	**Food Industry Asia**
~~**«Alimento» tal como se define en el *Manual de procedimiento de la Comisión del Codex Alimentarius*.**~~ Costa Rica no apoya la inclusión de esta nota, dado que las normas en cuestión son específicas y no aplican a todos los alimentos.	**Costa Rica**
Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods [3]. Recommendation 7: b)PHO prohibition Malaysia is of the view that it is sufficient to prohibit the use of partially hydrogenated oils (PHO) in all foods. Extending this prohibition to production for food use would require authorities to determine and verify the intended use of PHO by manufacturers, including for non-food applications such as cosmetics, which lies beyond their jurisdiction. Therefore, Malaysia proposes the wording to be amended as follows: "b) Prohibit the use of partially hydrogenated fats and oils (PHO) in all foods."	**Malaysia**
Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods [3]. Thailand generally supports the recommendation to include a footnote in the relevant provisions of the three targeted standards to explain the enforcement of the iTFA limit and the prohibition of partially hydrogenated oils (PHO). Having reviewed the practicality and effectiveness of the two proposed footnote options, Thailand notes that CXS 19-1981 and CXS 211-1999 may require different compliance verification approaches compared to CXS 256-1999. Accordingly, based on national regulations, Thailand proposes the following enforcement options for each standard: • CXS 19-1981 (Edible Fats and Oils): Option 1 and Option 2(b)	**Thailand**
Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods [3]. It is unclear whether note "iii" is intended to cover only option b) or both options a) and b). While the current placement of the note suggests that it applies only to option b), the explanation of the note appears to also relate to option a). If the note is intended to cover both options, it may be helpful to reconsider its placement to ensure clarity.	**Japan**
Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods [3]. FIA would like to seek clarification regarding the superscript reference. FIA understands that the correct reference should be superscript '2' which referring to Food. If the superscript is referring to the Enforcement footnote option 1 or 2, it is suggested for the superscript to be put at this statement 'Competent national and/or national authorities may adopt appropriate regulatory measures to:"	**Food Industry Asia**
Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods [3].	**Food Industry Asia**

COMMENT	MEMBER / OBSERVER
FIA proposed to just use the acronym. the acronym has already been explained in the definition.	
Interdire la production à des fins alimentaires et l'utilisation des graisses et huiles partiellement hydrogénées dans toutes les denrées alimentaires[3]. cette recommandation ne fixe pas un critère de qualité pour ces produits, mais c'est une recommandation de bonne pratique de fabrication.	**Tunisia**
prohibir la producción para uso alimentario y el uso de grasas y aceites parcialmente hidrogenados (APH) en todos los alimentos[3]. Los productos cubiertos por la presente norma (sea cuando se utilicen como ingredientes en otros alimentos o bien para consumo directo), deben: a) contener no más de 2 gramos de ácidos grasos trans producidos industrialmente (AGTi) por cada 100 gramos de grasa total y/o b) no contener aceites ni grasas parcialmente hidrogenados (APH) como ingredientes.	**Guatemala**
no contener aceites ni grasas parcialmente hidrogenados (APH) como ingredientes.~~**prohibir la producción para uso alimentario y el uso de grasas y aceites parcialmente hidrogenados (APH) en todos los alimentos[3].**~~	**Costa Rica**
ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION: Recommendation 9: Referral to CCFL for labelling provisions. Canada supports referring this matter to CCFL to improve clarity and distinguish fully vs. partially hydrogenated oils in in CXS 1-1985 labelling provisions.	**Canada**
ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION: Recommendation 11: Malaysia has no objection to the recommendation to include a footnote. Malaysia is of the view that Option 2 (detailed) could be considered, as it provides greater clarity and helps avoid potential confusion in compliance verification.	**Malaysia**
OPTION 1 (CONCISE): (a) Kenya supports the inclusion of the footnote, as it enhances clarity and facilitates a common understanding among users of the standard; and Kenya supports Option 1, Justification: Option 1 approach to implementation and verification recognizes the analytical capacity and constraints faced by many Member countries and, this ensures that the provisions are practical and enforceable. While option 2 provides a hybrid approach it makes it mandatory that may not be achievable. At the same time, part B of option 2 provides for use of a screening method that cannot be fully relied on in decision making.	**Kenya**
For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls 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), as compliance cannot rely solely on analytical methods. Indonesia supports Option 1 as the footnote to clarify the provisions regarding the prohibition of Partially Hydrogenated Oils (PHOs) and/or limitation of industrially produced trans-fatty acids (iTFA).	**Indonesia**

COMMENT	MEMBER / OBSERVER
Indonesia considers that the text in Option 1 is clear and unambiguous in addressing this matter.	
For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls 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), as compliance cannot rely solely on analytical methods. Paraguay sugiere eliminar la frase " en lugar de , o " Proponiendo quede como sigue: Para comprobar el cumplimiento de esta disposición, se utilizarán medidas no analíticas, como declaraciones de ingredientes y controles de procesos, además de, los métodos de análisis y muestreo pertinentes contenidos en los Métodos recomendados de análisis y muestreo (CXS 234-1999), ya que el cumplimiento no puede depender únicamente de métodos analíticos.	**Paraguay**
Para verificar el cumplimiento de esta disposición, se utilizarán medidas no analíticas, como las declaraciones de ingredientes y los controles de procesos, en lugar o además de los métodos de análisis y muestreo pertinentes que figuran en los *Métodos de análisis y de muestreo recomendados* (CXS 234-1999), ya que el cumplimiento no puede basarse únicamente en métodos analíticos. Costa Rica apoya la inclusión de una nota al pie en la disposición para aclarar el enfoque de verificación del cumplimiento. En línea con lo indicado por el GTE se considera que la opción 1 es más adecuada, dadas las limitaciones técnicas de la opción b) ii. El índice de yodo no debería usarse como indicador, dado que muchas grasas y aceites tienen un índice mayor a 4 y no son APH. En línea con la posición sobre el apartado 3, se reconoce la importancia de las disposiciones propuestas para la verificación del cumplimiento, pero se identifican serias implicaciones prácticas y técnicas al aplicarlas a todos los alimentos. Estas limitaciones justifican priorizar un enfoque centrado en ingredientes (grasas y aceites regulados por CXS 19-1981, CXS 256 y CXS 211).	**Costa Rica**
OPTION 2 (DETAILED): IDF supports the detailed footnote. The detailed footnote provides more clarity on the importance of differentiation.	**IDF/FIL**
OPTION 2 (DETAILED): Uruguay considers option 2 of the footnote with the suggested modifications to be better.	**Uruguay**
OPTION 2 (DETAILED): FIA is supportive of the detailed footnote (Option 2). The detailed footnote provides a lot more clarity on why/the importance of differentiation.	**Food Industry Asia**
OPCIÓN 2 (DETALLADA): Argentina acompaña la opción más detallada de verificación de cumplimiento (Opción 2). El enfoque híbrido —que combina métodos analíticos para la determinación de AGT totales con herramientas no analíticas (declaraciones de ingredientes, certificaciones “PHO-free”, controles documentales y de cadena de suministro)— refleja adecuadamente las limitaciones actuales para diferenciar analíticamente los AGT industriales de los de origen rumiante y aporta mayor robustez técnica y previsibilidad regulatoria. Asimismo, el abordaje propuesto para la prohibición de aceites parcialmente hidrogenados, basado principalmente en controles documentales y utilizando el valor de yodo solo como indicador orientativo a nivel de ingrediente, nos parece técnicamente sólido y alineado con prácticas regulatorias ya consolidadas.	**Argentina**

COMMENT	MEMBER / OBSERVER
For the iTFA limit, a hybrid approach ~~shall~~ should 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. Uruguay considers that the term "should" is more appropriate than "shall", as the provision is intended to be recommendatory rather than mandatory.	**Uruguay**
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,~~ declarations and supply chain records to estimate ruminant TFA content and infer iTFA quantity. For checking compliance with the iTFA limit, "PHO-free certification" may not be the most appropriate example of a non-analytical measure. If the food in question has a "PHO-free certification," it may be interpreted as implying that such certification is required to demonstrate compliance, even though compliance with the iTFA limit (iTFA < 2 g per 100 g of total fat) can be achieved without necessarily being PHO-free. Including "PHO-free certification" as an example under a) may therefore risk hindering an accurate understanding of the purpose and distinction of the note. In addition, the Technical Criteria for Monitoring Industrially Produced Trans-Fatty Acids in Foods (WHO; 2024), cited as a reference in paragraph 53 of the EWG report, does not clearly appear to include explicit wording corresponding to PHO-free certification. Accordingly, Japan proposes to delete "PHO-free certification" as an example of non-analytical measures under a).	**Japan**
For the PHO prohibition, compliance ~~shall~~ should 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. Uruguay considers that the term "should" is more appropriate than "shall", as the provision is intended to be recommendatory rather than mandatory.	**Uruguay**
8. METHODS OF ANALYSIS AND SAMPLING	
Brazil is of the opinion that the concise option, option 1, is enough for the context of the standard.	**Brazil**
For consistency, it may be necessary to consider including a similar provision in the main text of CXS 256-1999 and CXS 211-1999.	**Japan**
FIA recommend a revision to the statement to: "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, may be used. Where necessary, these methods may be complemented by other non-analytical measures, recognizing the limitations of analytical methods in verifying compliance with provisions related to industrially produced trans-fatty acids.". Replacing 'shall be used' to 'maybe used' as this approach is consistent with Codex principles which provide science-based standards and guidance while leaving the choice of compliance and enforcement tools to competent national and/or regional authorities.	**Food Industry Asia**

COMMENT	MEMBER / OBSERVER
Addition statement on acknowledging combination of alternative non-analytical method, recognizing the iTFA cannot be reliably distinguished from other TFA by analytical methods alone.	
Paraguay está de acuerdo.	**Paraguay**
OPCIÓN 1 (CONCISA): Para verificar el cumplimiento de esta disposición, se utilizarán medidas no analíticas, como las declaraciones de ingredientes y los controles de procesos, en lugar o además de los métodos de análisis y muestreo pertinentes que figuran en los Métodos de análisis y de muestreo recomendados (CXS 234-1999), ya que el cumplimiento no puede basarse únicamente en métodos analíticos. OPCIÓN 2 (DETALLADA): Para verificar el cumplimiento de esta disposición: a) Para el límite de AGTi, se utilizará un enfoque híbrido, combinando los métodos analíticos contenidos en los Métodos de análisis y de muestreo recomendados (CXS 234-1999) para la cuantificación de ácidos grasos trans totales, con medidas no analíticas, como declaraciones de ingredientes, certificaciones de ausencia de APH y registros de la cadena de suministro, para estimar el contenido de AGT de rumiantes e inferir la cantidad de AGTi. b) En cuanto a la prohibición de los aceites y grasas parcialmente hidrogenados, el cumplimiento se verificará mediante documentación, ya que no existen métodos analíticos validados para detectar directamente los aceites y grasas parcialmente hidrogenados en los alimentos. El índice de yodo (IY) puede utilizarse como herramienta de detección a nivel de ingredientes para ayudar a diferenciar los aceites totalmente hidrogenados de los aceites y grasas parcialmente hidrogenados, teniendo en cuenta que un IY ≥ 4 se asocia normalmente con los aceites y grasas parcialmente hidrogenados.	**Guatemala**
PROPOSED DRAFT REVISIONS TO THE *STANDARD FOR FAT SPREADS AND BLENDED SPREADS* (CXS 256-1999)	
2. DESCRIPTION	
2.1.1 Fat spreads and blended spreads 2.2.1 A los efectos de la presente norma, serán de aplicación las definiciones de aceites y grasas parcialmente hidrogenados (APH), aceites y grasas totalmente hidrogenados (ATH) y ácidos grasos trans producidos industrialmente (AGTi) establecidas en la Norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981).	**Guatemala**
2.1.1 Fat spreads and blended spreads Brazil suggests using the pattern of other standards for the definitions as follows: 2.1.1 Fat spreads and blended spreads are the products covered by this standard are foods that are plastic or fluid emulsions, principally of water and edible fats and oils.	**Brazil**
2.1.2 Edible fats and oils Brazil suggests using the pattern of other standards for the definitions. Moreover, Brazil would like to suggest excluding the note i with the explanation for hydrogenation. The first part of the note is not essential for the context of the standard and the second part should be added to the definition of industrial trans fatty acids (iTFA) on item 2. Descriptions. The alternatives are already included on item 3.	**Brazil**

COMMENT	MEMBER / OBSERVER
as follows: Edible fats and oils are 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 are included.	
2.1.2 Edible fats and oils For the proposed footnotes on hydrogenation/hydrogenated (recommendation 8), we recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term “hydrogenation” may refer to either full or partial hydrogenation. As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat.	**The Healthy Caribbean Coalition**
2.1.2 Edible fats and oils La definición tal como se propone es clara, sin embargo, se proponen varios ajustes de forma para precisar aspectos técnicos: «Las grasas y aceites parcialmente hidrogenados (APH) se producen mediante una reacción química proceso químico que añade que adiciona hidrógeno a algunos de los dobles enlaces de las grasas y aceites insaturados, utilizando un catalizador, sin llegar a la saturación total. Esto convierte esos dobles enlaces en enlaces simples, aumentando así la saturación de la grasa. Durante este proceso, algunos de los dobles enlaces restantes sufren una isomerización geométrica, y pasan de la configuración cis natural original a la configuración trans dando lugar a la formación de ácidos grasos trans, que pueden variar en función del grado de hidrogenación. El proceso puede controlarse con el objeto de crear grasas y aceites con una amplia gama de propiedades físicas, como la textura y el punto de fusión, independientemente de la composición original del aceite o grasa. También da lugar a la formación de ácidos grasos trans, que pueden variar en función del grado de hidrogenación».	**Guatemala**
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. For the proposed footnotes (footnotes number 1, 4 and 8) on hydrogenation/hydrogenated (recommendation 8), we recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term “hydrogenation” may refer to either full or partial hydrogenation. As provided in this standard, [add final new language from section 3].	**Coalition for Americas' Health**
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.	**World Public Health Nutrition Association**

COMMENT	MEMBER / OBSERVER
We recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term “hydrogenation” may refer to either full or partial hydrogenation. As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. Standards must avoid unnecessary clarification that may weaken the objectives of these revisions, the intent to improve clarity and consistency in the use of the terms “hydrogenation” and “hydrogenated” across Codex fats and oils standards is understood. From a technical standpoint, however, the term “hydrogenation” already encompasses both partial and full hydrogenation. The additional clarification as currently proposed is therefore unnecessary and risks diverting attention from the primary public health objective of eliminating iTFA from the food supply. In particular, clarification language that emphasizes national or regional legislative discretion may inadvertently weaken the primary objective of the proposed revisions, namely the elimination of iTFA from the food supply. Care should be taken to ensure that any additional explanatory text does not shift focus away from the substantive requirements of the standard or create interpretive pathways that undermine its public health intent.	
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.~~ Indonesia supports the inclusion of a clarifying footnote. However, Indonesia is of the view that the clarification text within the standard should focus solely on the scientific explanation of the terms 'hydrogenation' or 'hydrogenated'. Consequently, the second sentence ('this reflects...') should be removed, as it is not directly related to the technical provisions of the standard. The second sentence serves more as a justification for the revision of the standard, which has already been addressed in the project document.	**Indonesia**
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. For the proposed footnotes on hydrogenation/hydrogenated (recommendation 8), we recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term “hydrogenation” may refer to either full or partial hydrogenation. As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat.	**The Healthy Caribbean Coalition**
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.	**Canada**

COMMENT	MEMBER / OBSERVER
Footnote for hydrogenation. Canada supports adding the clarifying footnote as drafted to explain that “hydrogenation” may refer to full or partial hydrogenation, aligning with WHO best practices.	
El término «hidrogenación» puede referirse a la hidrogenación total o parcial, según sea aplicable en virtud de la legislación o la normativa nacional o regional. Esto refleja el objetivo de salud pública mundial de eliminar los ácidos grasos *trans* producidos industrialmente (AGTi) del suministro alimentario, estableciendo un límite obligatorio de no más de 2 g de AGTi por cada 100 g de grasa total en todos los alimentos y/o prohibiendo la producción y el uso de grasas y aceites parcialmente hidrogenados en todos los alimentos. Se sugiere considerar el siguiente texto: El término «hidrogenación» puede referirse a la hidrogenación total como la parcial. La distinción entre ambas es fundamental para cumplir con los objetivos globales de salud pública encaminados a la eliminación de los ácidos grasos trans (AGT) producidos industrialmente del suministro de alimentos. Las autoridades nacionales o regionales determinarán la aplicación de este término en su normativa, ya sea mediante el establecimiento de un límite máximo de 2 g de AGT por 100 g de grasa total en los alimentos, o mediante la prohibición del uso y producción de aceites parcialmente hidrogenados (PHO), o; mediante el establecimiento de las 2 medidas de forma simultánea.	**Ecuador**
2.2.1 Fully hydrogenated fats and oils We encourage Members to suggest revisions to the definition of “fully hydrogenated fats and oils” to reflect that full hydrogenation converts nearly all unsaturated bonds, resulting in an almost fully saturated fat structure, in order to improve technical accuracy and avoid potential misinterpretation in implementation.	**World Public Health Nutrition Association**
“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~~negligible. 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. Indonesia proposes replacing the word 'minimized' in the third sentence with 'negligible'. Indonesia considers the term 'minimized' potentially misleading, as it implies reduction rather than the outcome of full hydrogenation. In our view, ‘negligible’ is the more appropriate term, as complete hydrogenation effectively prevents iTFA formation. This change ensures better clarity regarding the full hydrogenation process in the context of global public health goals.	**Indonesia**
“Fully hydrogenated fats and oils” (FHO) are produced through a chemical process in which hydrogen is added to all the carbon-carbon 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. In the first sentence, Thailand proposes using the term “carbon–carbon double bonds” instead of “double bonds” to specify the type of double bonds involved in the hydrogenation process and to align with the definition of “trans-fatty acids” in CXG 2-1985, which uses this terminology.	**Thailand**

COMMENT	MEMBER / OBSERVER
“Fully hydrogenated fats and oils” (FHO) Brazil suggests deleting the last sentence of the proposed definition because being predominantly solid at room temperature is also a characteristic of partially hydrogenated fats and oils and is not essential for the definition. 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.	**Brazil**
“Fully hydrogenated fats and oils” (FHO) Paraguay está de acuerdo con la inclusión de la definición propuesta, en el entendimiento de que este enfoque aporta consistencia y claridad al documento.	**Paraguay**
2.2.1 A los efectos de la presente norma, serán de aplicación las definiciones de aceites y grasas parcialmente hidrogenados (APH), aceites y grasas totalmente hidrogenados (ATH) y ácidos grasos trans producidos industrialmente (AGTi) establecidas en la Norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981).~~Grasas y aceites totalmente hidrogenados~~ Una vez revisadas las propuestas de modificación en las tres normas, Costa Rica considera que las definiciones deberían ubicarse en la norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981), por ser más general evitando la repetición de definiciones extensas para facilitar su actualización y garantizar consistencia con el enfoque empleado generalmente en los textos del Codex. Se propone colocar una referencia en las normas para grasas animales especificadas (CXS 211-1999) y grasas para untar y mezclas de grasas para untar (CXS 256-1999).	**Costa Rica**
2.2.2 Partially hydrogenated fats and oils In line with the comments presented in the electronic working group, Brazil reiterates its position that the experience of other countries that already use the iodine value to define partially hydrogenated oils, an objective threshold between partially and fully hydrogenated fats and oils is useful, and the use of the iodine value (≥ 4 for partially hydrogenated fats and oils) makes this distinction clearer. Classifying a vegetable oil or fat as partially hydrogenated requires the definition of two criteria: it must have undergone the hydrogenation process and present an iodine value greater than 4. This definition has been used by Brazil since 2019, with no issues identified to date. It is worth noting that the same parameter is also used by other countries. In this context, we would like to suggest the following wording: 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. Hydrogenated fats and oils with iodine value greater than 4 (four) are considered partially hydrogenated.	**Brazil**

COMMENT	MEMBER / OBSERVER
Las «grasas y aceites totalmente hidrogenados» (ATH) 3.2 Los productos cubiertos por la presente norma (sea cuando se utilicen como ingredientes en otros alimentos o bien para consumo directo), deben: a) contener no más de 2 gramos de ácidos grasos trans producidos industrialmente (AGTi) por cada 100 gramos de grasa total y/o b) no contener aceites ni grasas parcialmente hidrogenados (APH) como ingredientes. La definición tal como se propone es idónea para fines de inclusión/ referencia en las normas específicas del CCFO, no obstante, se proponen los siguientes ajustes para fines de claridad y simplificación: «Las grasas y aceites totalmente hidrogenados (ATH) se producen mediante una reacción química un proceso químico en el que se añade adiciona hidrógeno a todos los dobles enlaces de las grasas y aceites insaturados, utilizando un catalizador. Este proceso convierte todos los enlaces insaturados en enlaces simples saturados, lo que da lugar a una estructura de grasas totalmente saturadas. Dado que la hidrogenación es completa, se minimiza minimizando la formación de ácidos grasos trans producidos industrialmente (AGTi). Las grasas y aceites resultantes suelen ser sólidos o semisólidos a temperatura ambiente debido a su punto de fusión más elevado y presentan una mayor estabilidad y resistencia a la oxidación».	**Guatemala**
~~**Las «grasas y aceites totalmente hidrogenados» (ATH) se producen mediante un proceso químico en el que se añade hidrógeno a todos los dobles enlaces de las grasas y aceites insaturados, utilizando un catalizador. Este proceso convierte todos los enlaces insaturados en enlaces simples saturados, lo que da como resultado una estructura grasa totalmente saturada. Dado que la hidrogenación es completa, se reduce al mínimo la formación de ácidos grasos *trans* producidos industrialmente (AGTi). Las grasas y aceites resultantes suelen ser sólidos o semisólidos a temperatura ambiente debido a su punto de fusión más elevado y presentan una mayor estabilidad y resistencia a la oxidación.**~~ Referencia a Norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981)	**Costa Rica**
"Partially hydrogenated fats and oils" (PHO) 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 industrially-produced trans-fatty acids, which may vary depending on the degree of hydrogenation. This edit is consistent with the definition of fully hydrogenated fats and oils	**IDF/FIL**
"Partially hydrogenated fats and oils" (PHO) produced through a chemical process that adds hydrogen to some of the carbon-carbon double bonds in unsaturated fats and oils, using a catalyst. This converts those double bonds into single bonds, making the fat and oil 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.	**Thailand**

COMMENT	MEMBER / OBSERVER
1.In the first sentence, Thailand proposes using the term “carbon–carbon double bonds” instead of “double bonds” to specify the type of double bonds involved in the hydrogenation process and to align with the definition of “trans-fatty acids” in CXG 2-1985, which uses this terminology. 2.Thailand also notes that the hydrogenation process described in the first sentence applies to both fats and oils. Accordingly, for technical accuracy, it is proposed to insert the words “and oils” after the word “fats” in the second sentence.	
“Partially hydrogenated fats and oils” (PHO) FIA proposed amendment of PHO as below: 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 industrially-produced trans fatty acids, which may vary depending on the degree of hydrogenation. The proposed changes is to ensure consistent clarity.	**Food Industry Asia**
“Partially hydrogenated fats and oils” (PHO) Paraguay está de acuerdo con la inclusión de la definición propuesta, en el raciocinio de que esta definición aporta a la diferenciación entre los tipos de grasas y aceites acompañando el crecimiento industrial, dando así, mayor claridad al documento.	**Paraguay**
~~**2.2.2 Grasas y aceites parcialmente hidrogenados**~~ Referencia a Norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981)	**Costa Rica**
Las «grasas y aceites parcialmente hidrogenados» (APH) Se considera necesaria la aclaración de los términos contenidos en la Norma general para el etiquetado de los alimentos preenvasados (CXS 1-1985), tal como se propone, mediante el CCFL, sin que ello implique necesariamente esperar a que el CCFO concluya su trabajo. Esta revisión ayudaría a distinguir claramente los aceites totalmente hidrogenados de los aceites parcialmente hidrogenados que están asociados con la formación de AGTi.	**Guatemala**
~~**Las «grasas y aceites parcialmente hidrogenados» (APH) se producen mediante un proceso químico en el que se añade hidrógeno a algunos de los enlaces dobles de las grasas y aceites insaturados, utilizando un catalizador. Esto convierte esos enlaces dobles en enlaces simples, lo que hace que la grasa sea más saturada. Durante este proceso, algunos de los enlaces dobles restantes sufren una isomerización geométrica, pasando de la configuración *cis* natural a la configuración *trans*. El control del proceso permite crear grasas y aceites con una amplia gama de propiedades físicas, como la textura y el punto de fusión, independientemente de la composición original del aceite. También da lugar a la formación de ácidos grasos *trans*, que pueden variar en función del grado de hidrogenación.**~~ Referencia a Norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981)	**Costa Rica**

COMMENT	MEMBER / OBSERVER
“Industrially produced trans-fatty acids” (iTFA) are trans-fatty acids ~~obtained through industrial processes,~~ primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils~~, though smaller~~ . Smaller amounts may also be produced during other ~~industrial~~ processes, such as oil refining and deodorization. iTFA are not naturally produced and defined solely by their method of ~~production and cannot be chemically distinguished from other TFA~~production. The revised draft definition of iTFA provided in CX/FO 26/29/5 has not been incorporated into the draft text of the standard. Edits were made to aligned with the revised draft definition of iTFA provided in CX/FO 26/29/5. IDF would like to suggest the indicated additions to the revised draft definition of iTFA provided in CX/FO 26/29/5. We consider it important to keep the definition focused and to avoid including analytical aspects, as these do not necessarily fit within a definition and may change over time. Any evolution in analytical methods could quickly render such references incorrect. For this reason, we propose deleting the phrase “are difficult to chemically distinguish from naturally occurring TFA.” Instead, the definition should emphasize the essential point: iTFA are not naturally produced, unlike ruminant TFA. This is why we propose adding the wording “are not naturally produced.”	**IDF/FIL**
“Industrially produced trans-fatty acids” (iTFA) In line with the comments presented in the electronic working group, Brazil suggests replacing “cannot be” by “difficult to” in the definition, considering that chemically speaking, it is known that: a) ruminant trans fatty acids main fatty acids are vaccenic acid (18:1Δ11t) in amounts of 30 to 50%,16:1 fatty acids around 20% and the presence of conjugated linolenic acid (CLA); b) industrial trans fatty acids from vegetable origin are characterized by presence of 20-30% of trans fatty acids 18:1; c) industrial trans fatty acids from marine origin are characterized by the presence of C20:1 and C22:1 trans isomers. So, they are difficult but not impossible to distinguish. Moreover, Brazil suggests that part of the content of the note for hydrogenation in item 1 should be added to this definition in order to give greater prominence to the need to eliminate iTFA from the food supply.The alternatives are already included on item 3. In this context, we would like to suggest the following wording: 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 chemically distinguished from other TFA. There is a global public health objective of eliminating industrially produced trans-fatty acids (iTFA) from the food supply. As an alternative, the last sentence can be deleted without prejudice to the understanding.	**Brazil**
“Industrially produced trans-fatty acids” (iTFA) FIA noted that this definition does not align with what has been circulated in CX/FO 26/29/5: “industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller	**Food Industry Asia**

COMMENT	MEMBER / OBSERVER
amounts may also be produced during other processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to chemically distinguish from naturally occurring TFA". Based on the CX/FO 26/29/5 definition, FIA would like to suggest two amendments for iTFA definition as below: "industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to simply chemically distinguish from naturally occurring ruminant TFA".	
"Industrially produced trans-fatty acids" (iTFA) Paraguay está de acuerdo con la inclusión de la definición propuesta , en el entendimiento que el término es ampliamente utilizado y, en ese sentido compartimos lo mencionado en el EWG en la importancia de la revisión de la CXG 2 -1985 , donde se encuentra una definición amplia de los TFA y la diferenciación aportaría comprensibilidad a los textos.	**Paraguay**
~~**2.2.3 Ácidos grasos *trans* producidos industrialmente**~~ Referencia a la norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981)	**Costa Rica**
Los «ácidos grasos *trans* producidos industrialmente» (AGTi) 3.2 Los productos cubiertos por la presente norma (sea cuando se utilicen como ingredientes en otros alimentos o bien para consumo directo), deben: a) contener no más de 2 gramos de ácidos grasos trans producidos industrialmente (AGTi) por cada 100 gramos de grasa total y/o b) no contener aceites ni grasas parcialmente hidrogenados (APH) como ingredientes.	**Guatemala**
Los «ácidos grasos *trans* producidos industrialmente» (AGTi) Se apoya la revisión estructural de la norma CXS 19-1981 con el objeto de incluir una sección denominada «Métodos de análisis» en el cuerpo principal, manteniendo al mismo tiempo esta sección en el apéndice, a fin de garantizar la coherencia entre las normas del Codex y apoyar la aplicación efectiva del límite de AGTi y/o la prohibición de APH.	**Guatemala**
Los «ácidos grasos *trans* producidos industrialmente» (AGTi) La definición tal como se propone es clara, precisa e idónea para fines de inclusión/ referencia en las normas específicas del CCFO. Se considera que remitir al CCNFSDU la revisión de la definición de AGT contenida en las directrices CXG 2-1985 contribuiría a aportar mayor claridad y coherencia; no obstante, se insta al Comité a remitir esta definición una vez esté consensuada y no hasta la finalización de los trabajos actualmente en curso en el CCFO.	**Guatemala**
~~**Los «ácidos grasos *trans* producidos industrialmente» (AGTi) son ácidos grasos *trans* obtenidos mediante procesos industriales, formados principalmente durante la hidrogenación parcial de grasas y aceites insaturados, aunque también pueden producirse en cantidades menores durante otros procesos industriales, como el refinado y la desodorización del aceite. Los AGTi se definen únicamente por su método de producción y no pueden distinguirse químicamente de otros AGT.**~~ Referencia a Norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981)	**Costa Rica**

COMMENT	MEMBER / OBSERVER
Los «ácidos grasos *trans* producidos industrialmente» (AGTi) son ácidos grasos *trans* obtenidos mediante procesos industriales, formados principalmente durante la hidrogenación parcial de grasas y aceites insaturados, aunque también pueden producirse en cantidades menores durante otros procesos industriales, como el refinado y la desodorización del aceite. Los AGTi se definen únicamente por su método de producción y no pueden distinguirse químicamente de ~~otros AGT~~los AGTr. Se propone modificar la última frase del párrafo de la siguiente manera: "Los AGTi se definen únicamente por su método de producción y no pueden distinguirse químicamente de los AGTr", dado que los "otros AGT" son los ácidos grasos trans de origen natural provenientes de rumiantes.	**Argentina**
3. ESSENTIAL COMPOSITION AND QUALITY FACTORS	
Se apoya la inclusión de la disposición en la sección 3: Factores esenciales relativos a la composición y la calidad» de cada norma específica, y el añadido de dicha sección cuando no exista en la norma, como se propone en el Anexo II.	**Guatemala**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: For Section 3 of the revised standards (recommendation 7) we encourage Members to suggest the use of “shall” rather than “should” in the provision on iTFA limits and/or PHO prohibitions, consistent with Codex drafting practice for essential compositional requirements and to ensure clear definition of product conformance. We recommend the revisions (in quotation marks) to strengthen the specificity and clarity of this provision, while retaining the EWG Chairs’ text that allows flexibility in the approaches: "The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: • Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or • Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods" The inclusion of a provision recommending mandatory legislative or regulatory measures to limit iTFA and/or prohibiting PHO is strongly recommended. This approach is in line with WHO's REPLACE action package and reflects best practice regulatory measures already implemented in over 60 countries. Recommending mandatory measures to regulate iTFA also supports Codex’s mandate of harmonizing international trade while protecting consumer health across countries. The effectiveness and clarity of this provision can be significantly strengthened by replacing “should” with “shall”. In Codex standards, “shall” is routinely used to define essential compositional and quality requirements for product conformance. An iTFA limit and/or a prohibition of PHO is intended to establish product conformance with the standard, rather than merely provide implementation guidance. The use of “shall” would therefore align with established Codex drafting practice, including within the three standards under revision. While retaining “should” as currently proposed would weaken clarity and undermine harmonization. It is also important to note that the use of “shall” does not alter the voluntary nature of Codex standards. Codex texts remain voluntary in their adoption by Members, while the use of normative language provides clarity regarding the content of the standard itself. Clear, normative drafting supports consistent interpretation and application across jurisdictions and strengthens the harmonizing function of Codex standards	**International Association of Consumer Food Organizations**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Suggested changes to the text and explanation:	**Coalition for Americas' Health**

COMMENT	MEMBER / OBSERVER
The inclusion of a provision recommending mandatory legislative or regulatory measures to limit iTFA and/or prohibiting PHO is strongly recommended. This approach is in line with WHO's REPLACE action package and reflects best practice regulatory measures already implemented in over 60 countries. Recommending mandatory measures to regulate iTFA also supports Codex's mandate of harmonizing international trade while protecting consumer health across countries. The effectiveness and clarity of this provision can be significantly strengthened by replacing "should" with "shall". In Codex standards, "shall" is routinely used to define essential compositional and quality requirements for product conformance. An iTFA limit and/or a prohibition of PHO is intended to establish product conformance with the standard, rather than merely provide implementation guidance. The use of "shall" would therefore align with established Codex drafting practice, including within the three standards under revision. While retaining "should" as currently proposed would weaken clarity and undermine harmonization. It is also important to note that the use of "shall" does not alter the voluntary nature of Codex standards. Codex texts remain voluntary in their adoption by Members, while the use of normative language provides clarity regarding the content of the standard itself. Clear, normative drafting supports consistent interpretation and application across jurisdictions and strengthens the harmonizing function of Codex standards. For this reason, for Section 3 of the revised standards (recommendation 7), we recommend adding the following wording (bolded) to strengthen the specificity and clarity of this provision, while retaining the EWG Chairs' text that allows flexibility in the approaches: The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods.	
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: We encourage Members to suggest the use of "shall" rather than "should" in the provision on iTFA limits and/or PHO prohibitions, consistent with Codex drafting practice for essential compositional requirements and to ensure clear definition of product conformance. We recommend adding the following wording to strengthen the specificity and clarity of this provision, while retaining the EWG Chairs' text that allows flexibility in the approaches: "The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, competent national and/or regional authorities should implement mandatory legislative or regulatory measures to:..." In Codex standards, "shall" is routinely used to define essential compositional and quality requirements for product conformance. An iTFA limit and/or a prohibition of PHO is intended to establish product conformance with the standard, rather than merely provide implementation guidance. The use of "shall" would therefore align with established Codex drafting practice, including within the three standards under revision. While retaining "should" as currently proposed would weaken clarity and undermine harmonization.	**World Public Health Nutrition Association**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: The inclusion of a provision recommending mandatory legislative or regulatory measures to limit iTFA and/or prohibiting PHO is strongly recommended. This approach is in line with WHO's REPLACE action package and reflects best practice regulatory measures already implemented in over 60 countries. Recommending mandatory measures to regulate iTFA also supports Codex's mandate of harmonizing international trade while protecting consumer health across countries.	**World Public Health Nutrition Association**

COMMENT	MEMBER / OBSERVER
3.2 Competent national and/or regional authorities ~~should implement mandatory legislative or regulatory measures to~~should: It is Indonesia's understanding that Codex standards and related texts are voluntary in nature. Consequently, including language implying that countries are required to implement mandatory legislative or regulatory measures may be inconsistent with the voluntary nature of Codex standards. Therefore, Indonesia proposes deleting the phrase 'implement mandatory legislative or regulatory measures to' in this text maintain consistency with Codex principles.	**Indonesia**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Republic of Korea is of the view that revising the three CODEX standards to set the limit of trans-fatty acids for "all foods" is beyond the scope of CCFO and requires sufficient discussion with other Committees. In addition, since Section 3 is about essential composition and quality factors, it seems unnecessary to include the mandatory legal matters.	**Republic of Korea**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: We support the inclusion of a provision addressing limits on industrially produced trans-fatty acids (iTFA) and/or prohibitions on partially hydrogenated oils (PHO), in line with WHO's REPLACE action package and best practices already implemented by many Members. We recommend strengthening this provision by using "shall" rather than "should" to ensure clarity and consistency with Codex drafting practice. In Codex commodity standards, "shall" is routinely used in Section 3 (Essential Composition and Quality Factors) to define requirements for product conformance with the standard. An iTFA limit and/or a prohibition on PHO is intended to establish whether a product conforms to the standard, rather than to provide optional implementation guidance. Retaining "should" in this context risks weakening clarity and undermining the harmonizing function of the standard. The use of "shall" does not alter the voluntary nature of Codex standards, which remains established procedurally. Rather, it provides clear normative content for the standard itself, while preserving Members' flexibility in national implementation. Clear, normative drafting supports consistent interpretation and application across jurisdictions and facilitates harmonization in international trade. We also note that clarity at the Codex level is particularly important given the role of Codex standards as international reference points, including in WTO contexts. Ambiguous or overly flexible language may reduce the effectiveness of the standard and create uncertainty regarding product conformance. We therefore suggest the following wording for the proposed provision: **"The total amount of industrially produced trans-fatty acids (iTFA) in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, national and/or regional authorities should implement mandatory legislative or regulatory measures to: 1. Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or 2. Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods."** This approach aligns with existing Codex drafting practice by clearly defining compositional conformance within Section 3, while allowing flexibility for Members to determine the most appropriate national regulatory approach to achieve compliance.	**The Healthy Caribbean Coalition**

COMMENT	MEMBER / OBSERVER
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Brazil would like to suggest the following wording to item b to make it clearer: b) prohibit the production, import, use and supply of partially hydrogenated oils and fats for use in food and of foods formulated with these ingredients.	**Brazil**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: FIA support the objective of reducing iTFA intake. However, the inclusion of the word 'mandatory legislative or regulatory measures' goes beyond Codex's standard role. The standard should establish product characteristics rather than mandate national regulatory actions. FIA's proposed amendment to the statement: "Competent national and/or national authorities may adopt appropriate regulatory measures to:" This proposed revision maintains the public health objective and preserves regulatory flexibility to country authorities.	**Food Industry Asia**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Paraguay se encuentra con la implementación de la Reglamentación Nacional de Grasas Trans , donde el límite propuesto es el establecido en este item, por lo cual estamos de acuerdo y conforme al paquete técnico Replace , Paraguay apoya la propuesta de que ambos enfoques queden en la norma respetando la diversidad regulatoria de los miembros.	**Paraguay**
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[6] ; and/or 1. FIA propose to just use the acronym. the acronym has already been explained in the definition. 2. FIA proposed amendment to this clause to "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 which is intended for the final consumer or intended for supply to retail ; and/or Justifications: i. This will be aligned with the gazetted maximum TFA limit under the Malaysia Food Regulations. ii. In EU, with reference to Regulations (EU) 2019/649, the maximum TFA limit is set for food for final consumer and food supplied to retail. iii. In EU, with reference to the EFSA' opinion on the re-evaluation of INS 471, EFSA panel noted that INS 471 can be manufactured from PHO and the TFA content in INS 471 ranged from 0.01 to 59.92%. However, the EFSA panel considered that there is no need to set a specific TFA limit for the emulsifier INS 471 since Regulations (EU) 2019/649 has established the maximum TFA limit in food for final consumer.	**Food Industry Asia**
a) Fixer une teneur maximale en acides gras *trans* industriels (AGTi) égale à 2 g pour 100 g de matières grasses totales dans toutes les denrées alimentaires[6] ; et/ou Cette paragraphe doit fixer les facteurs essentiels de composition et de qualité relatives aux produits concernés par cette norme. Par contre la proposition concerne des autres produits non concernés par le domaine d'application de cette norme.	**Tunisia**

COMMENT	MEMBER / OBSERVER
3.2 Los productos cubiertos por la presente norma (sea cuando se utilicen como ingredientes en otros alimentos o bien para consumo directo), deben:~~Las autoridades nacionales y/o regionales competentes deben aplicar medidas legislativas o reglamentarias obligatorias para:~~ Costa Rica apoya el objetivo de salud pública de la OMS para eliminar las grasas trans industriales (AGTi) del suministro mundial de alimentos. Sin embargo, se sugiere utilizar el lenguaje adecuado para una norma de producto Codex. Dada la naturaleza voluntaria del Codex, las normas deben establecer requisitos técnicos sobre el producto al que se refieren.	**Costa Rica**
3.2 Las autoridades nacionales y/o regionales competentes ~~deben~~ deberían aplicar medidas legislativas o reglamentarias obligatorias para: Argentina propone que, a continuación de los puntos a) y b), se agregue la siguiente frase: "Además, las autoridades nacionales otorgarán un plazo razonable para la adecuación de los alimentos al límite establecido de AGTi y para la eliminación del uso de APH".	**Argentina**
a) ~~establecer un límite de ácidos grasos~~ contener *~~trans~~* ~~producidos industrialmente (AGTi) de~~ no más de 2 gramos de ácidos grasos trans producidos industrialmente (AGTi) por cada 100 gramos de grasa total ~~en todos los alimentos~~[6] y/o Es importante apegarse al Documento de Proyecto aprobado por la CAC, que en la Sección 3 inciso b) establece: “asegurarse de que el ámbito de aplicación de la prohibición y/o los límites ante mencionados abarque los productos de grasas y aceites utilizados como ingredientes en otros productos alimentarios, y considerar opciones de cumplimiento centradas en autorización para ingredientes en lugar de desafíos analíticos para diferenciar entre los AGTi en productos destinados al consumidor y los AGT para rumiantes”. En ese sentido, Costa Rica considera que podría ser una inconsistencia hacer referencia a “todos los alimentos” si se trata de normas específicas. El Manual de Procedimiento establece claramente el Modelo de estructura de las normas del Codex sobre productos, donde se indica que el ámbito de aplicación deberá contener una declaración clara y concisa acerca del alimento o alimentos a los que se aplique la norma, por tanto, si hay una disposición que aplica a todos los alimentos esto debería estar claramente establecido en el ámbito de cada norma. Adicionalmente, el MP establece que la sección de “Factores esenciales relativos a la composición y la calidad” debe contener requisitos de composición y calidad del producto cubierto por esa norma, no de la totalidad de los alimentos. Es importante señalar que cuando un alimento elaborado utiliza grasas y aceites conformes con las normas del Codex, el perfil de grasa del ingrediente se refleja necesariamente en el producto final; en consecuencia, este también cumpliría con los límites establecidos.	**Costa Rica**

COMMENT	MEMBER / OBSERVER
b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods[7]. Thailand generally supports the recommendation to include a footnote in the relevant provisions of the three targeted standards to explain the enforcement of the iTFA limit and the prohibition of partially hydrogenated oils (PHO). Having reviewed the practicality and effectiveness of the two proposed footnote options, Thailand notes that CXS 19-1981 and CXS 211-1999 may require different compliance verification approaches compared to CXS 256-1999. Accordingly, based on national regulations, Thailand proposes the following enforcement options for each standard: CXS 256-1999 (Fat Spreads and Blended Spreads): Option 1	**Thailand**
b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods[7]. FIA would like to seek clarification regarding the superscript reference. FIA understands that the correct reference should be superscript '6' which referring to Food. If the superscript is referring to the Enforcement footnote option 1 or 2, it is suggested for the superscript to be put at the this statement 'Competent national and/or national authorities may adopt appropriate regulatory measures to:"	**Food Industry Asia**
b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods[7]. FIA proposed to just use the acronym. the acronym has already been explained in the definition.	**Food Industry Asia**
b) Interdire la production à des fins alimentaires et l'utilisation des graisses et huiles partiellement hydrogénées dans toutes les denrées alimentaires[7]. cette recommandation ne fixe pas un critère de qualité pour ces produits, mais c'est une recommandation de bonne pratique de fabrication.	**Tunisia**
~~**«Alimento» tal como se define en el *Manual de procedimiento de la Comisión del Codex Alimentarius*.**~~ Costa Rica no apoya la inclusión de esta nota, dado que las normas en cuestión son específicas y no aplican a todos los alimentos.	**Costa Rica**
b) prohibir la producción para uso alimentario y el uso de grasas y aceites parcialmente hidrogenados (APH) en todos los alimentos[7]. La nota aclaratoria sobre la hidrogenación, tal como se propone, es clara y conforme con las buenas prácticas de la OMS.	**Guatemala**
b) ~~prohibir la producción para uso alimentario y el uso de~~ no contener grasas y aceites parcialmente hidrogenados (APH) ~~en todos los alimentos~~como ingrediente[7].	**Costa Rica**

COMMENT	MEMBER / OBSERVER
For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls 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), as compliance cannot rely solely on analytical methods. Indonesia supports Option 1 as the footnote to clarify the provisions regarding the prohibition of Partially Hydrogenated Oils (PHOs) and/or limitation of industrially produced trans-fatty acids (iTFA). Indonesia considers that the text in Option 1 is clear and unambiguous in addressing this matter.	**Indonesia**
For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls 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), as compliance cannot rely solely on analytical methods. Paraguay sugiere eliminar la frase " en lugar de , o " Proponiendo quede como sigue: Para comprobar el cumplimiento de esta disposición, se utilizarán medidas no analíticas, como declaraciones de ingredientes y controles de procesos, además de, los métodos de análisis y muestreo pertinentes contenidos en los Métodos recomendados de análisis y muestreo (CXS 234-1999), ya que el cumplimiento no puede depender únicamente de métodos analíticos.	**Paraguay**
OPTION 2 (DETAILED): IDF supports the detailed footnote. The detailed footnote provides more clarity on the importance of differentiation.	**IDF/FIL**
OPTION 2 (DETAILED): FIA is supportive of the detailed footnote (Option 2). The detailed footnote provides a lot more clarity on why/the importance of differentiation.	**Food Industry Asia**
OPCIÓN 2 (DETALLADA): Argentina acompaña la opción más detallada de verificación de cumplimiento (Opción 2). El enfoque híbrido —que combina métodos analíticos para la determinación de AGT totales con herramientas no analíticas (declaraciones de ingredientes, certificaciones “PHO-free”, controles documentales y de cadena de suministro)— refleja adecuadamente las limitaciones actuales para diferenciar analíticamente los AGT industriales de los de origen rumiante y aporta mayor robustez técnica y previsibilidad regulatoria. Asimismo, el abordaje propuesto para la prohibición de aceites parcialmente hidrogenados, basado principalmente en controles documentales y utilizando el valor de yodo solo como indicador orientativo a nivel de ingrediente, nos parece técnicamente sólido y alineado con prácticas regulatorias ya consolidadas.	**Argentina**
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, declarations~~ and supply chain records to estimate ruminant TFA content and infer iTFA quantity. As mentioned in the previous comment.	**Japan**
Para el límite de AGTi, se utilizará un enfoque híbrido, combinando los métodos analíticos contenidos en los *Métodos de análisis y de muestreo recomendados* (CXS 234-1999) para la cuantificación de ácidos grasos *trans* totales, con medidas	**Guatemala**

COMMENT	MEMBER / OBSERVER
no analíticas, como declaraciones de ingredientes, certificaciones de ausencia de APH y registros de la cadena de suministro, para estimar el contenido de AGT de rumiantes e inferir la cantidad de AGTi. Se apoya la inclusión de una nota al pie en la disposición para aclarar el enfoque de verificación del cumplimiento. En línea con lo indicado por el GTE se considera que la opción 1 es más adecuada, dadas las limitaciones técnicas de la opción b) ii. La frase: "teniendo en cuenta que un ÍY ≥ 4 se asocia normalmente con los aceites parcialmente hidrogenados", es incorrecta; por tanto, en caso de considerarse debería revisarse si lo que se quiso decir es: "teniendo en cuenta que un ÍY ≤ 4 se asocia normalmente con los aceites parcialmente hidrogenados". En línea con la respuesta a la recomendación 7, se reconoce la importancia de las disposiciones propuestas para la verificación del cumplimiento, pero se identifican serias implicaciones prácticas y técnicas al aplicarlas a todos los alimentos. Estas limitaciones justifican priorizar un enfoque centrado en ingredientes (grasas y aceites regulados por CXS 19-1981, CXS 256 y CXS 211).	
PROPOSED DRAFT REVISIONS TO THE STANDARD FOR NAMED ANIMAL FATS (CXS 211-1999)	
For the proposed footnotes on hydrogenation/hydrogenated (recommendation 8), we recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term "hydrogenation" may refer to either full or partial hydrogenation. As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat.	**The Healthy Caribbean Coalition**
Lard subject to processing may contain refined lard, lard stearin and **hydrogenated[8]** lard, or be subject to processes of modification provided that it is clearly labelled. Comment: Kenya proposes the editorial amendment to the definition of Lard subject to processing defined to read: Lard subject to processing may contain refined lard, lard stearin and hydrogenatedi lard, or be subject to other processes of modification provided that it is clearly labelled.	**Kenya**
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. For the proposed footnotes (footnotes number 1, 4 and 8) on hydrogenation/hydrogenated (recommendation 8), we recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term "hydrogenation" may refer to either full or partial hydrogenation. As provided in this standard, [add final new language from section 3].	**Coalition for Americas' Health**
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	**World Public Health Nutrition Association**

COMMENT	MEMBER / OBSERVER
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. We recommend removing these as clarification on those terms is unnecessary. If retained, they should not create any confusion regarding the revisions done to the standards; therefore, the footnotes should be simplified as follows: The term "hydrogenation" may refer to either full or partial hydrogenation. As provided in the essential composition section, the total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. Standards must avoid unnecessary clarification that may weaken the objectives of these revisions, the intent to improve clarity and consistency in the use of the terms "hydrogenation" and "hydrogenated" across Codex fats and oils standards is understood. From a technical standpoint, however, the term "hydrogenation" already encompasses both partial and full hydrogenation. The additional clarification as currently proposed is therefore unnecessary and risks diverting attention from the primary public health objective of eliminating iTFA from the food supply. In particular, clarification language that emphasizes national or regional legislative discretion may inadvertently weaken the primary objective of the proposed revisions, namely the elimination of iTFA from the food supply. Care should be taken to ensure that any additional explanatory text does not shift focus away from the substantive requirements of the standard or create interpretive pathways that undermine its public health intent.	
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.~~ Indonesia supports the inclusion of a clarifying footnote. However, Indonesia is of the view that the clarification text within the standard should focus solely on the scientific explanation of the terms 'hydrogenation' or 'hydrogenated'. Consequently, the second sentence ('this reflects...') should be removed, as it is not directly related to the technical provisions of the standard. The second sentence serves more as a justification for the revision of the standard, which has already been addressed in the project document.	**Indonesia**
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. What is the superscript i referring to?	**ICUMSA**
Fully hydrogenated fats and oils (FHO) We encourage Members to suggest revisions to the definition of "fully hydrogenated fats and oils" to reflect that full hydrogenation converts nearly all unsaturated bonds, resulting in an almost fully saturated fat structure, in order to improve technical accuracy and avoid potential misinterpretation in implementation.	**International Association of Consumer Food Organizations**
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~~negligible. 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.	**Indonesia**

COMMENT	MEMBER / OBSERVER
Indonesia proposes replacing the word 'minimized' in the third sentence with 'negligible'. Indonesia considers the term 'minimized' potentially misleading, as it implies reduction rather than the outcome of full hydrogenation. In our view, 'negligible' is the more appropriate term, as complete hydrogenation effectively prevents iTFA formation. This change ensures better clarity regarding the full hydrogenation process in the context of global public health goals.	
Fully hydrogenated fats and oils (FHO) are produced through a chemical process in which hydrogen is added to all the carbon-carbon 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. In the first sentence, Thailand proposes using the term "carbon–carbon double bonds" instead of "double bonds" to specify the type of double bonds involved in the hydrogenation process and to align with the definition of "trans-fatty acids" in CXG 2-1985, which uses this terminology.	**Thailand**
Fully hydrogenated fats and oils (FHO) Brazil suggests deleting the last sentence of the proposed definition because being predominantly solid at room temperature is also a characteristic of partially hydrogenated fats and oils and is not essential for the definition. 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.	**Brazil**
Fully hydrogenated fats and oils (FHO) Paraguay está de acuerdo con la inclusión de la definición propuesta, en el entendimiento de que este enfoque aporta consistencia y claridad al documento.	**Paraguay**
2.2.1 A los efectos de la presente norma, serán de aplicación las definiciones de aceites y grasas parcialmente hidrogenados (APH), aceites y grasas totalmente hidrogenados (ATH) y ácidos grasos trans producidos industrialmente (AGTi) establecidas en la Norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981).~~Grasas y aceites totalmente hidrogenados~~ Una vez revisadas las propuestas de modificación en las tres normas, Costa Rica considera que las definiciones deberían ubicarse en la norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981), por ser más general evitando la repetición de definiciones extensas para facilitar su actualización y garantizar consistencia con el enfoque empleado generalmente en los textos del Codex. Se propone colocar una referencia en las normas para grasas animales especificadas (CXS 211-1999) y grasas para untar y mezclas de grasas para untar (CXS 256-1999), de forma que se lea como se propone.	**Costa Rica**

COMMENT	MEMBER / OBSERVER
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 industrially-produced trans-fatty acids, which may vary depending on the degree of hydrogenation. This edit is consistent with the definition of fully hydrogenated fats and oils	**IDF/FIL**
Partially hydrogenated fats and oils (PHO) are produced through a chemical process that adds hydrogen to some of the carbon-carbon double bonds in unsaturated fats and oils, using a catalyst. This converts those double bonds into single bonds, making the fat and oil 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. 1.In the first sentence, Thailand proposes using the term “carbon–carbon double bonds” instead of “double bonds” to specify the type of double bonds involved in the hydrogenation process and to align with the definition of “trans-fatty acids” in CXG 2-1985, which uses this terminology. 2.Thailand also notes that the hydrogenation process described in the first sentence applies to both fats and oils. Accordingly, for technical accuracy, it is proposed to insert the words “and oils” after the word “fats” in the second sentence.	**Thailand**
Partially hydrogenated fats and oils (PHO) In line with the comments presented in the electronic working group, Brazil reiterates its position that the experience of other countries that already use the iodine value to define partially hydrogenated oils, an objective threshold between partially and fully hydrogenated fats and oils is useful, and the use of the iodine value (≥ 4 for partially hydrogenated fats and oils) makes this distinction clearer. Classifying a vegetable oil or fat as partially hydrogenated requires the definition of two criteria: it must have undergone the hydrogenation process and present an iodine value greater than 4. This definition has been used by Brazil since 2019, with no issues identified to date. It is worth noting that the same parameter is also used by other countries. In this context, we would like to suggest the following wording: 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. Hydrogenated fats and oils with iodine value greater than 4 (four) are considered partially hydrogenated.	**Brazil**

COMMENT	MEMBER / OBSERVER
Partially hydrogenated fats and oils (PHO) FIA proposed amendment of PHO as below: 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 industrially-produced trans fatty acids, which may vary depending on the degree of hydrogenation. The proposed changes is to ensure consistent clarity.	**Food Industry Asia**
Partially hydrogenated fats and oils (PHO) Paraguay está de acuerdo con la inclusión de la definición propuesta, en el raciocinio de que esta definición aporta a la diferenciación entre los tipos de grasas y aceites acompañando el crecimiento industrial, dando así, mayor claridad al documento.	**Paraguay**
~~**Las grasas y aceites totalmente hidrogenados (ATH) se producen mediante un proceso químico en el que se añade hidrógeno a todos los dobles enlaces de las grasas y aceites insaturados, utilizando un catalizador. Este proceso convierte todos los enlaces insaturados en enlaces simples saturados, lo que da como resultado una estructura grasa totalmente saturada. Dado que la hidrogenación es completa, se reduce al mínimo la formación de ácidos grasos *trans* producidos industrialmente (AGTi). Las grasas y aceites resultantes suelen ser sólidos o semisólidos a temperatura ambiente debido a su punto de fusión más elevado y presentan una mayor estabilidad y resistencia a la oxidación.**~~ Referencia a la norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981)	**Costa Rica**
2.2.3 Industrially produced *trans*-fatty acids Referral to CCNFSDU to revise definition of 'trans-fatty acids'. Canada supports referring this matter to CCNFSDU to ensure global consistency and alignment with WHO definitions, while considering implications for nutrition labelling.	**Canada**
~~**2.2.2 Grasas y aceites parcialmente hidrogenados**~~	**Costa Rica**
Industrially produced *trans*-fatty acids (iTFA) are *trans*-fatty acids ~~obtained through industrial processes,~~ primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils~~, though smaller~~. Smaller amounts may also be produced during other ~~industrial~~ processes, such as oil refining and deodorization. iTFA are not naturally produced and defined solely by their method of production ~~and cannot be chemically distinguished from other TFA.~~ The revised draft definition of iTFA provided in CX/FO 26/29/5 has not been incorporated into the draft text of the standard. Edits were made to aligned with the revised draft definition of iTFA provided in CX/FO 26/29/5. IDF would like to suggest the indicated additions to the revised draft definition of iTFA provided in CX/FO 26/29/5. We consider it important to keep the definition focused and to avoid including analytical aspects, as these do not necessarily fit within a definition and may change over time. Any evolution in analytical methods could quickly render such references incorrect. For this reason, we propose deleting the phrase "are difficult to chemically distinguish from naturally occurring TFA."	**IDF/FIL**

COMMENT	MEMBER / OBSERVER
Instead, the definition should emphasize the essential point: iTFA are not naturally produced, unlike ruminant TFA. This is why we propose adding the wording “are not naturally produced.”	
Industrially produced *trans*-fatty acids (iTFA) In line with the comments presented in the electronic working group, Brazil suggests replacing “cannot be” by “difficult to” in the definition, considering that chemically speaking, it is known that: a) ruminant trans fatty acids main fatty acids are vaccenic acid (18:1Δ11t) in amounts of 30 to 50%,16:1 fatty acids around 20% and the presence of conjugated linolenic acid (CLA); b) industrial trans fatty acids from vegetable origin are characterized by presence of 20-30% of trans fatty acids 18:1; c) industrial trans fatty acids from marine origin are characterized by the presence of C20:1 and C22:1 trans isomers. So, they are difficult but not impossible to distinguish. Moreover, Brazil suggests that part of the content of the note for hydrogenation in item 1 should be added to this definition in order to give greater prominence to the need to eliminate iTFA from the food supply.The alternatives are already included on item 3. In this context, we would like to suggest the following wording: 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 chemically distinguished from other TFA. There is a global public health objective of eliminating industrially produced trans-fatty acids (iTFA) from the food supply. As an alternative, the last sentence can be deleted without prejudice to the understanding.	**Brazil**
Industrially produced *trans*-fatty acids (iTFA) FIA noted that this definition does not align with what has been circulated in CX/FO 26/29/5: “industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to chemically distinguish from naturally occurring TFA”. Based on the CX/FO 26/29/5 definition, FIA would like to suggest two amendments for iTFA definition as below: “industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and are difficult to simply chemically distinguish from naturally occurring ruminant TFA”.	**Food Industry Asia**
Industrially produced *trans*-fatty acids (iTFA) Paraguay está de acuerdo con la inclusión de la definición propuesta , en el entendimiento que el término es ampliamente utilizado y, en ese sentido compartimos lo mencionado en el EWG en la importancia de la revisión de la CXG 2 -1985 , donde se encuentra una definición amplia de los TFA y la diferenciación aportaría comprensibilidad a los textos.	**Paraguay**

COMMENT	MEMBER / OBSERVER
~~Las grasas y aceites parcialmente hidrogenados (APH) se producen mediante un proceso químico en el que se añade hidrógeno a algunos de los enlaces dobles de las grasas y aceites insaturados, utilizando un catalizador. Esto convierte esos enlaces dobles en enlaces simples, lo que hace que la grasa sea más saturada. Durante este proceso, algunos de los enlaces dobles restantes sufren una isomerización geométrica, pasando de la configuración *cis* natural a la configuración *trans*. El control del proceso permite crear grasas y aceites con una amplia gama de propiedades físicas, como la textura y el punto de fusión, independientemente de la composición original del aceite. También da lugar a la formación de ácidos grasos *trans*, que pueden variar en función del grado de hidrogenación.~~ Referencia a la norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981)	**Costa Rica**
~~**2.2.3 Ácidos grasos *trans* producidos industrialmente**~~	**Costa Rica**
~~**Los ácidos grasos *trans* producidos industrialmente (AGTi) son ácidos grasos *trans* obtenidos mediante procesos industriales, formados principalmente durante la hidrogenación parcial de grasas y aceites insaturados, aunque también pueden producirse en cantidades menores durante otros procesos industriales, como el refinado y la desodorización del aceite. Los AGTi se definen únicamente por su método de producción y no pueden distinguirse químicamente de otros AGT.**~~ Referencia a la norma para las grasas y aceites comestibles no regulados por normas individuales (CXS 19-1981)	**Costa Rica**
Los ácidos grasos *trans* producidos industrialmente (AGTi) son ácidos grasos *trans* obtenidos mediante procesos industriales, formados principalmente durante la hidrogenación parcial de grasas y aceites insaturados, aunque también pueden producirse en cantidades menores durante otros procesos industriales, como el refinado y la desodorización del aceite. Los AGTi se definen únicamente por su método de producción y no pueden distinguirse químicamente de ~~otros AGT~~los AGTr. Se propone modificar la última frase del párrafo de la siguiente manera: "Los AGTi se definen únicamente por su método de producción y no pueden distinguirse químicamente de los AGTr", dado que los "otros AGT" son los ácidos grasos trans de origen natural provenientes de rumiantes.	**Argentina**
3. ESSENTIAL COMPOSITION AND QUALITY FACTORS	
Se apoya el objetivo de salud pública de la OMS para eliminar las grasas trans industriales (AGTi) del suministro mundial de alimentos. Sin embargo, se sugiere utilizar el lenguaje adecuado para una norma de producto Codex. Dada la naturaleza voluntaria del Codex, las normas deben establecer requisitos técnicos sobre el producto al que se refieren. Adicionalmente es importante apegarse al Documento de Proyecto aprobado por la CAC, que en la Sección 3 inciso b) establece: “asegurarse de que el ámbito de aplicación de la prohibición y/o los límites ante mencionados abarque los productos de grasas y aceites utilizados como ingredientes en otros productos alimentarios, y considerar opciones de cumplimiento centradas en autorización para ingredientes en lugar de desafíos analíticos para diferenciar entre los AGTi en productos destinados al consumidor y los AGT para rumiantes”. Lo anterior, ya que podría ser una inconsistencia hacer referencia a “todos los alimentos” si se trata de normas específicas. Es importante señalar que los alimentos elaborados que usen esas grasas, si se ajustan a Codex, adquieren de hecho ese perfil de grasa (es decir, no podrían incorporar como ingrediente una grasa que no cumpla). Por lo expuesto, se propone la siguiente redacción para las tres normas:	**Guatemala**

COMMENT	MEMBER / OBSERVER
Los productos cubiertos por la presente norma (sea cuando se utilicen como ingredientes en otros alimentos o bien para consumo directo), deben: a) contener no más de 2 gramos de ácidos grasos trans producidos industrialmente (AGTi) por cada 100 gramos de grasa total y/o b) no contener aceites ni grasas parcialmente hidrogenados (APH) como ingredientes.	
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: For Section 3 of the revised standards (recommendation 7) we encourage Members to suggest the use of "shall" rather than "should" in the provision on iTFA limits and/or PHO prohibitions, consistent with Codex drafting practice for essential compositional requirements and to ensure clear definition of product conformance. We recommend the revisions (in quotation marks) to strengthen the specificity and clarity of this provision, while retaining the EWG Chairs' text that allows flexibility in the approaches: "The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: • Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or • Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods" The inclusion of a provision recommending mandatory legislative or regulatory measures to limit iTFA and/or prohibiting PHO is strongly recommended. This approach is in line with WHO's REPLACE action package and reflects best practice regulatory measures already implemented in over 60 countries. Recommending mandatory measures to regulate iTFA also supports Codex's mandate of harmonizing international trade while protecting consumer health across countries. The effectiveness and clarity of this provision can be significantly strengthened by replacing "should" with "shall". In Codex standards, "shall" is routinely used to define essential compositional and quality requirements for product conformance. An iTFA limit and/or a prohibition of PHO is intended to establish product conformance with the standard, rather than merely provide implementation guidance. The use of "shall" would therefore align with established Codex drafting practice, including within the three standards under revision. While retaining "should" as currently proposed would weaken clarity and undermine harmonization. It is also important to note that the use of "shall" does not alter the voluntary nature of Codex standards. Codex texts remain voluntary in their adoption by Members, while the use of normative language provides clarity regarding the content of the standard itself. Clear, normative drafting supports consistent interpretation and application across jurisdictions and strengthens the harmonizing function of Codex standards	**International Association of Consumer Food Organizations**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Suggested changes to the text and explanation: The inclusion of a provision recommending mandatory legislative or regulatory measures to limit iTFA and/or prohibiting PHO is strongly recommended. This approach is in line with WHO's REPLACE action package and reflects best practice regulatory measures already implemented in over 60 countries. Recommending mandatory measures to regulate iTFA also supports Codex's mandate of harmonizing international trade while protecting consumer health across countries. The effectiveness and clarity of this provision can be significantly strengthened by replacing "should" with "shall". In Codex standards, "shall" is routinely used to define essential compositional and quality requirements for product conformance. An iTFA limit and/or a prohibition of PHO is intended to establish product conformance with the standard, rather than merely provide implementation guidance. The use of "shall" would	**Coalition for Americas' Health**

COMMENT	MEMBER / OBSERVER
therefore align with established Codex drafting practice, including within the three standards under revision. While retaining “should” as currently proposed would weaken clarity and undermine harmonization. It is also important to note that the use of “shall” does not alter the voluntary nature of Codex standards. Codex texts remain voluntary in their adoption by Members, while the use of normative language provides clarity regarding the content of the standard itself. Clear, normative drafting supports consistent interpretation and application across jurisdictions and strengthens the harmonizing function of Codex standards. For this reason, for Section 3 of the revised standards (recommendation 7), we recommend adding the following wording (bolded) to strengthen the specificity and clarity of this provision, while retaining the EWG Chairs’ text that allows flexibility in the approaches: The total amount of iTFA in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods.	
3.2 Competent national and/or regional authorities ~~should implement mandatory legislative or regulatory measures to~~should: It is Indonesia’s understanding that Codex standards and related texts are voluntary in nature. Consequently, including language implying that countries are required to implement mandatory legislative or regulatory measures may be inconsistent with the voluntary nature of Codex standards. Therefore, Indonesia proposes deleting the phrase 'implement mandatory legislative or regulatory measures to' in this text maintain consistency with Codex principles.	**Indonesia**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Republic of Korea is of the view that revising the three CODEX standards to set the limit of trans-fatty acids for “all foods” is beyond the scope of CCFO and requires sufficient discussion with other Committees. In addition, since Section 3 is about essential composition and quality factors, it seems unnecessary to include the mandatory legal matters.	**Republic of Korea**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: We support the inclusion of a provision addressing limits on industrially produced trans-fatty acids (iTFA) and/or prohibitions on partially hydrogenated oils (PHO), in line with WHO’s REPLACE action package and best practices already implemented by many Members. We recommend strengthening this provision by using “shall” rather than “should” to ensure clarity and consistency with Codex drafting practice. In Codex commodity standards, “shall” is routinely used in Section 3 (Essential Composition and Quality Factors) to define requirements for product conformance with the standard. An iTFA limit and/or a prohibition on PHO is intended to establish whether a product conforms to the standard, rather than to provide optional implementation guidance. Retaining “should” in this context risks weakening clarity and undermining the harmonizing function of the standard.	**The Healthy Caribbean Coalition**

COMMENT	MEMBER / OBSERVER
The use of “shall” does not alter the voluntary nature of Codex standards, which remains established procedurally. Rather, it provides clear normative content for the standard itself, while preserving Members’ flexibility in national implementation. Clear, normative drafting supports consistent interpretation and application across jurisdictions and facilitates harmonization in international trade. We also note that clarity at the Codex level is particularly important given the role of Codex standards as international reference points, including in WTO contexts. Ambiguous or overly flexible language may reduce the effectiveness of the standard and create uncertainty regarding product conformance. We therefore suggest the following wording for the proposed provision: **“The total amount of industrially produced trans-fatty acids (iTFA) in the final product shall not exceed 2 grams of iTFA per 100 grams of total fat. To achieve this, national and/or regional authorities should implement mandatory legislative or regulatory measures to: 1. Set a limit of industrially produced trans-fatty acids to not more than 2 g per 100 g of total fat in all foods; and/or 2. Prohibit the production for food use, and the use of partially hydrogenated fats and oils in all foods.”** This approach aligns with existing Codex drafting practice by clearly defining compositional conformance within Section 3, while allowing flexibility for Members to determine the most appropriate national regulatory approach to achieve compliance.	
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Brazil would like to suggest the following wording to item b to make it clearer: b) prohibit the production, import, use and supply of partially hydrogenated oils and fats for use in food and of foods formulated with these ingredients.	**Brazil**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: FIA support the objective of reducing iTFA intake. However, the inclusion of the word ‘mandatory legislative or regulatory measures’ goes beyond Codex’s standard role. The standard should establish product characteristics rather than mandate national regulatory actions. FIA’s proposed statement: “Competent national and/or national authorities may adopt appropriate regulatory measures to:" This proposed revision maintains the public health objective and preserves regulatory flexibility to country authorities.	**Food Industry Asia**
3.2 Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: Paraguay se encuentra con la implementación de la Reglamentación Nacional de Grasas Trans , donde el límite propuesto es el establecido en este item, por lo cual estamos de acuerdo y conforme al paquete técnico Replace , Paraguay apoya la propuesta de que ambos enfoques queden en la norma respetando la diversidad regulatoria de los miembros.	**Paraguay**
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[9]; and/or Placement of provision to limit iTFA and/or prohibit PHO. Canada supports placing the provision in Section 3 (“Essential Composition and Quality Factors”) of each standard and adding this section where missing, to reinforce its mandatory nature.	**Canada**
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[9]; and/or	**Food Industry Asia**

COMMENT	MEMBER / OBSERVER
1. FIA propose to just use the acronym. the acronym has already been explained in the definition. 2. FIA proposed amendment to this clause to "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 which is intended for the final consumer or intended for supply to retail ; and/or Justifications: i. This will be aligned with the gazetted maximum TFA limit under the Malaysia Food Regulations. ii. In EU, with reference to Regulations (EU) 2019/649, the maximum TFA limit is set for food for final consumer and food supplied to retail. iii. In EU, with reference to the EFSA' opinion on the re-evaluation of INS 471, EFSA panel noted that INS 471 can be manufactured from PHO and the TFA content in INS 471 ranged from 0.01 to 59.92%. However, the EFSA panel considered that there is no need to set a specific TFA limit for the emulsifier INS 471 since Regulations (EU) 2019/649 has established the maximum TFA limit in food for final consumer.	
a) Fixer une teneur maximale en acides gras *trans* industriels (AGTi) égale à 2 g pour 100 g de matières grasses totales dans toutes les denrées alimentaires[9] ; et/ou Cette paragraphe doit fixer les facteurs essentiels de composition et de qualité relatives aux produits concernés par cette norme. Par contre la proposition concerne des autres produits non concernés par le domaine d'application de cette norme.	**Tunisia**
b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods[10]. Wording of provision to limit iTFA and/or prohibit PHO. Canada supports the draft wording, including the use of "should" to maintain Codex flexibility while promoting strong public health action. Canada also supports the footnote referencing the Codex definition of "food."	**Canada**
b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods[10]. Thailand generally supports the recommendation to include a footnote in the relevant provisions of the three targeted standards to explain the enforcement of the iTFA limit and the prohibition of partially hydrogenated oils (PHO). Having reviewed the practicality and effectiveness of the two proposed footnote options, Thailand notes that CXS 19-1981 and CXS 211-1999 may require different compliance verification approaches compared to CXS 256-1999. Accordingly, based on national regulations, Thailand proposes the following enforcement options for each standard: CXS 211-1999 (Named Animal Fats): Option 1 and Option 2(b)	**Thailand**
b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods[10]. 1. FIA propose to just use the acronym. the acronym has already been explained in the definition. 2. FIA would like to seek clarification regarding the superscript reference. FIA understands that the correct reference should be superscript '9' which is referring to Food. If the superscript is referring to the Enforcement footnote option 1 or 2, it is suggested for the superscript to be put at this statement 'Competent national and/or national authorities may adopt appropriate regulatory measures to:"	**Food Industry Asia**

COMMENT	MEMBER / OBSERVER
b) Interdire la production à des fins alimentaires et l'utilisation des graisses et huiles partiellement hydrogénées dans toutes les denrées alimentaires[10]. Cette recommandation ne fixe pas un critère de qualité pour ces produits, mais c'est une recommandation de bonne pratique de fabrication.	**Tunisia**
3.2 Los productos cubiertos por la presente norma (sea cuando se utilicen como ingredientes en otros alimentos o bien para consumo directo), deben:~~Las autoridades nacionales y/o regionales competentes deben aplicar medidas legislativas o reglamentarias obligatorias para:~~ Costa Rica apoya el objetivo de salud pública de la OMS para eliminar las grasas trans industriales (AGTi) del suministro mundial de alimentos. Sin embargo, se sugiere utilizar el lenguaje adecuado para una norma de producto Codex. Dada la naturaleza voluntaria del Codex, las normas deben establecer requisitos técnicos sobre el producto al que se refieren.	**Costa Rica**
3.2 Las autoridades nacionales y/o regionales competentes deben aplicar medidas legislativas o reglamentarias obligatorias para: Argentina propone que, a continuación de los puntos a) y b), se agregue la siguiente frase: "Además, las autoridades nacionales otorgarán un plazo razonable para la adecuación de los alimentos al límite establecido de AGTi y para la eliminación del uso de APH".	**Argentina**
3.2 Las autoridades nacionales y/o regionales competentes ~~deben~~ deberían aplicar medidas legislativas o reglamentarias obligatorias para:	**Argentina**
ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION: Referral to CCMAS for endorsement of methods. Canada supports the inclusion of validated methods for verifying compliance with the proposed iTFA limit and/or PHO prohibition. However, we note a critical correction is needed to ensure technical accuracy: AOAC 996.06 is incorrectly listed in Table A.1 as an integrated method. This method does not include fat extraction or methylation steps; it is an analysis-only GC method that assumes the sample has already been converted to FAME. Therefore, AOAC 996.06 should be listed in Table A.2 (analysis-only methods). In addition, any recommendation to propose AOAC 996.06 for CCMAS endorsement must clarify that it cannot be endorsed for composite foods unless paired with validated methylation methods (e.g., AOCS Ce 2b-11 or AOCS Ce 2c-1,) required for FAME preparation. Canada also recommends clarifying the distinction between integrated methods (Table A.1), which include extraction + methylation + gas chromatography in one validated procedure, and analysis-only methods (Table A.2), which require separate extraction and methylation steps. This distinction is critical for interpretation and enforcement. Also, Canada supports use of the methods for iodine value determination listed in Table A.3. as a screening tool for PHO at the ingredient level.	**Canada**
a) ~~establecer un límite de ácidos grasos~~ contener *~~trans~~* producidos industrialmente (AGTi) de ~~no~~ más de 2 gramos de ácidos grasos trans producidos industrialmente (AGTi) por cada 100 gramos de grasa total ~~en todos los alimentos~~[9] ~~y/o~~ Es importante apegarse al Documento de Proyecto aprobado por la CAC, que en la Sección 3 inciso b) establece: "asegurarse de que el ámbito de aplicación de la prohibición y/o los límites ante mencionados abarque los productos de grasas y aceites utilizados como ingredientes en otros productos alimentarios, y considerar opciones de cumplimiento centradas en autorización para	**Costa Rica**

COMMENT	MEMBER / OBSERVER
ingredientes en lugar de desafíos analíticos para diferenciar entre los AGTi en productos destinados al consumidor y los AGT para rumiantes". En ese sentido, Costa Rica considera que podría ser una inconsistencia hacer referencia a "todos los alimentos" si se trata de normas específicas. El Manual de Procedimiento establece claramente el Modelo de estructura de las normas del Codex sobre productos, donde se indica que el ámbito de aplicación deberá contener una declaración clara y concisa acerca del alimento o alimentos a los que se aplique la norma, por tanto, si hay una disposición que aplica a todos los alimentos esto debería estar claramente establecido en el ámbito de cada norma. Adicionalmente, el MP establece que la sección de "Factores esenciales relativos a la composición y la calidad" debe contener requisitos de composición y calidad del producto cubierto por esa norma, no de la totalidad de los alimentos. Es importante señalar que cuando un alimento elaborado utiliza grasas y aceites conformes con las normas del Codex, el perfil de grasa del ingrediente se refleja necesariamente en el producto final; en consecuencia, este también cumpliría con los límites establecidos.	
~~**«Alimento» tal como se define en el *Manual de procedimiento de la Comisión del Codex Alimentarius*.**~~ Costa Rica no apoya la inclusión de esta nota, dado que las normas en cuestión son específicas y no aplican a todos los alimentos.	**Costa Rica**
For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls 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), as compliance cannot rely solely on analytical methods. Indonesia supports Option 1 as the footnote to clarify the provisions regarding the prohibition of Partially Hydrogenated Oils (PHOs) and/or limitation of industrially produced trans-fatty acids (iTFA). Indonesia considers that the text in Option 1 is clear and unambiguous in addressing this matter.	**Indonesia**
For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls 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), as compliance cannot rely solely on analytical methods. Paraguay sugiere eliminar la frase " en lugar de , o " Proponiendo quede como sigue: Para comprobar el cumplimiento de esta disposición, se utilizarán medidas no analíticas, como declaraciones de ingredientes y controles de procesos, además de, los métodos de análisis y muestreo pertinentes contenidos en los Métodos recomendados de análisis y muestreo (CXS 234-1999), ya que el cumplimiento no puede depender únicamente de métodos analíticos.	**Paraguay**
b) ~~prohibir la producción para uso alimentario y el uso de grasas y no contener~~ aceites ~~ni grasas~~ parcialmente hidrogenados (APH) ~~en todos los alimentos~~como ingredientes.~~[10].~~	**Costa Rica**
OPTION 2 (DETAILED): IDF supports the detailed footnote. The detailed footnote provides more clarity on the importance of differentiation.	**IDF/FIL**
OPTION 2 (DETAILED):	**Canada**

COMMENT	MEMBER / OBSERVER
Footnote for compliance verification. Canada supports Option 2 (Detailed) for the compliance verification footnote. It provides clear and specific guidance on hybrid enforcement approaches for both strategies to limit iTFA intake. This specificity more clearly supports a consistent approach to enforcement across jurisdictions, reducing potential barriers to trade.	
OPTION 2 (DETAILED): FIA is supportive of the detailed footnote (Option 2). The detailed footnote provides a lot more clarity on why/the importance of differentiation.	**Food Industry Asia**
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,~~ declarations and supply chain records to estimate ruminant TFA content and infer iTFA quantity. As mentioned in the previous comment.	**Japan**
OPCIÓN 2 (DETALLADA): Argentina acompaña la opción más detallada de verificación de cumplimiento (Opción 2). El enfoque híbrido —que combina métodos analíticos para la determinación de AGT totales con herramientas no analíticas (declaraciones de ingredientes, certificaciones “PHO-free”, controles documentales y de cadena de suministro)— refleja adecuadamente las limitaciones actuales para diferenciar analíticamente los AGT industriales de los de origen rumiante y aporta mayor robustez técnica y previsibilidad regulatoria. Asimismo, el abordaje propuesto para la prohibición de aceites parcialmente hidrogenados, basado principalmente en controles documentales y utilizando el valor de yodo solo como indicador orientativo a nivel de ingrediente, nos parece técnicamente sólido y alineado con prácticas regulatorias ya consolidadas.	**Argentina**