

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

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### WORK OF THE CODEX COMMITTEE ON FATS AND OILS (CCFO)

(CX/CAC 24/47/4 and CX/CAC 24/47/4 Add.1)

(Comments of Argentina, Bangladesh, Benin, Cabo Verde, India, Philippines, Senegal, South Africa, Syrian Arab Republic, United Republic of Tanzania, East African Community (EAC), The Global Organization for EPA and DHA Omega-3s (GOED))

#### Argentina

#### - Parte 1: Normas y textos afines presentados para su aprobación definitiva.

- *Revisión de la Norma para aceites vegetales especificados (CXS 210-1999): Inclusión del aceite de aguacate REP24/FO, párr. 44, Apéndice V Trámite 8.*

Agradecemos a México por el trabajo realizado y apoyamos la aprobación de este estándar para la inclusión del aceite de aguacate en la norma de aceites especificados

#### - Enmienda/revisión de la Norma para aceites vegetales especificados (CXS 210-1999) - REP24/FO párrs. 51, 55 y 62, apéndices VI, VII y VIII Trámite 5/8:

\* *Inclusión del aceite de semillas de camelia.*

\* *Inclusión del aceite de sachá inchi.*

\* *Inclusión del aceite de soja de alto contenido de ácido oleico.*

Argentina apoya los trabajos realizados y en particular la inclusión de aceite de soja de alto contenido de ácido oleico.

#### - Revisión de la Norma para los aceites de oliva y aceites de orujo de oliva (CXS 33-1981): Revisión de las secciones 3 y 8 y del apéndice1- REP24/FO, párr. 85 i), Apéndice IX, Trámite 5/8.

Lamentablemente Argentina no pudo participar de la pasada reunión de CCFO.

En el documento CX/CAC 24/47/4 - LABOR DEL COMITÉ DEL CODEX SOBRE GRASAS Y ACEITES (CCFO), se encuentra para aprobación las modificaciones propuestas a la Norma para los aceites de oliva y aceites de orujo de oliva (CXS 33-1981): Revisión de las secciones 3 y 8 y del apéndice1 REP24/FO, párr. 85 i), Apéndice IX.

La versión actual de la norma CXS 33-1981 sobre aceites de oliva y aceite de orujo de oliva establece en la nota al pie de la sección ***Desmethylsterol composition (% total sterols)*** lo siguiente:

\* Cuando un aceite auténtico contiene naturalmente un nivel de campesterol **entre > 4,0% y ≤ 4,5%, se considera aceite de oliva virgen o extra virgen** si el nivel de estigmasterol es ≤ 1,4%, el nivel de delta-7-estigmastenol es ≤ 0,3% y de estigmastadienos es ≤ 0,05 mg/kg. Los demás parámetros cumplirán los límites establecidos en la Norma

\* *When an authentic oil naturally has a campesterol level >4.0% and ≤ 4.5%, **it is considered** virgin or extra virgin olive oil if the stigmastanol level is ≤ 1.4%, the delta-7-stigmastanol level is ≤ 0.3% and stigmastadienes ≤ 0.05 mg/kg. The other parameters shall meet the limits set out in the standard.*

En cambio, el texto propuesto para ser aprobado por la 47ª CAC dice:

b) Cuando un aceite de oliva virgen o virgen extra presente de forma natural un contenido de campesterol > 4,0% y ≤ 4,8%, **podrá considerarse auténtico** si el contenido de estigmastanol es ≤ 1,4% y el de delta-7-estigmastanol es ≤ 0,3%. Los demás parámetros deberán cumplir los límites establecidos en la norma.

*b) When a virgin or extra virgin olive oil naturally has a campesterol level > 4.0% and ≤ 4.8%, **it may be considered** authentic if the stigmastanol level is ≤ 1.4% and the delta-7-stigmastanol level is ≤ 0.3%. The other parameters shall meet the limits set out in the standard.*

Ante esta modificación, quisiéramos consultarle, ya que no surge del reporte de la última reunión, si este cambio de redacción de **"it is considered"** por **"it may be considered"** fue discutido por el plenario del CCFO y cuál fue la justificación para realizar el cambio ya que consideramos que modifica el espíritu de esa nota al pie.

Es importante considerar que la composición de esteroides forma parte de la parte de la norma que incluye los parámetros de **cumplimiento obligatorio** y por lo tanto no debería quedar **sujeto a la discrecionalidad de quien quiera aplicarlo, o no** y eso es lo que resulta del cambio de la expresión **"it is considered"** en el pie de página por **"may be considered authentic"**. En la norma Codex los parámetros que no son de cumplimiento obligatorio se ubican en el Anexo, y no es este el caso.

Deseamos destacar que Argentina puede aceptar la modificación del nivel superior de campesterol a 4,8% en este árbol de decisiones. De hecho, Argentina había demostrado que aceites auténticos podían llegar a contener 4.8% de campesterol con muestras de aceites que fueron analizadas en laboratorios dispuestos por el COI, y fue la conclusión a la que habían llegado alguno de los expertos químicos del COI. Sin embargo, no podemos aceptar el cambio de redacción dado que consideramos que es retroceder pues se había logrado demostrar que aceites de oliva auténticos pueden dar naturalmente valores más altos de campesterol, lo cual había quedado reflejado en el texto de la nota al pie de la norma actualmente vigente.

Argentina ha remitido sus comentarios con respecto al cambio en la redacción como respuesta a la CL 2024/35-CAC. E insistimos, podemos aceptar el aumento del % de campesterol como se propone entre 4 y 4,8% pero no aceptamos el cambio de lenguaje del texto, queremos que siga señalando el texto que **un aceite con estos porcentajes de campesterol "es considerado aceite de oliva virgen o extra virgen"** si .....

Argentina agradece la labor realizada por India y Singapur. Lamentablemente aun cuando seguimos figurando como copresidentes no pudimos colaborar con los trabajos.

Argentina está de acuerdo con los términos del documento y por ello consideramos que se debe avanzar su adopción en trámite 5, como así también estamos de acuerdo en ampliar su alcance para cubrir los plaguicidas, siendo para ello necesario (a) incluir disposiciones para realizar un seguimiento de la pureza y la estabilidad de las soluciones estándar de plaguicidas mixtos; (b) refinar las secciones relevantes en el documento según sea necesario; Creemos que solucionará muchos problemas a los laboratorios, especialmente de los países en desarrollo.

Argentina apoya plenamente este trabajo.

## Bangladesh

*Document: CX/CAC 24/47/4*

*Part 1: Standards Submitted for Final Adoption:*

*Revision to the Standard for olive oils and olive pomace oils (CXS 33-1981): Revision of Sections 3, 8 and Appendix 1*

This comment pertains to the ongoing revision of the Standard for Olive Oils and Olive Pomace Oils (CXS 33-1981).

Bangladesh notes the great progress accomplished by CCFO28 and the effort of alignment that the committee has reached with other international standards, in particular standards of the International Olive Oil Council.

Bangladesh notes the comment from the Chair of CCFO to ensure that the geographic variability of olive oil be considered in parameter attesting to authenticity.

Bangladesh encourages all on-going efforts to ensure that such variability be documented with data and be accounted for in the update of the standards particularly for the levels of Sterols, used as indicators of authenticity.

Such efforts will ensure that Codex maintains and reinforces its status as an evidence-based food standard setting body.

Bangladesh supports the adoption of the agreed-upon revisions at Step 5/8.

## Benin

### Normes et textes apparentés soumis pour adoption finale

Contexte :

Le CCFO28 a discuté et convenu sans objection de soumettre les normes suivantes à la CAC47 pour adoption finale :

- 1) Révision de la Norme pour les huiles végétales portant un nom spécifique (CXS 210-1999) : inclusion de l'huile d'avocat (étape 8) ;
- 2) Amendement/révision de la Norme pour les huiles végétales portant un nom spécifique (CXS 210-1999) pour inclure l'huile de graines de camélia, l'huile de sacha inchi et l'huile de soja à haute teneur en acide oléique (étape 5/8) ;
- 3) Révision de la Norme pour les huiles d'olive et les huiles de grignons d'olive (CXS 33-1981) : mise à jour de la composition essentielle, des facteurs de qualité et des méthodes d'analyse et d'échantillonnage (étape 5/8) ; et
- 4) Révision de la norme relative aux huiles de poisson (CXS 329-2017) pour inclure l'huile de calanus (étape 5/8).

**Position :**

La République du Bénin soutient l'adoption finale des révisions/amendements ci-dessus aux normes et textes connexes sur les graisses et les huiles par la CAC47.

**Justification :**

Les normes sont fondées sur des données scientifiques solides, leur adoption favorisera la protection des consommateurs et un commerce sûr.

- 5) Modifications des dispositions d'étiquetage des contenants non destinés à la vente au détail dans les six normes existantes sur les graisses et les huiles (CXS 19-1981 ; CXS 33- 1981 ; CXS 210-1999 ; CXS 211-1999 ; CXS 256-1999 ; et CXS 329-2017)

Contexte :

Le CCFO28 a convenu de modifier les normes mentionnées afin d'inclure une disposition d'étiquetage en vrac, faisant référence à la CXS 346-2021 comme l'exige le manuel de procédure. Le CCFO a demandé au CCFL d'approuver ces dispositions d'étiquetage, transmettant ainsi l'amendement à la CAC47 pour adoption finale et informant le CCFL en conséquence.

**Position :**

La République du Bénin soutient l'adoption des projets d'amendements aux dispositions d'étiquetage des contenants non destinés à la vente au détail dans les 6 normes existantes sur les graisses et les huiles.

**Justification :**

Les amendements sont alignés sur les procédures établies pour l'élaboration des normes du Codex.

- 6) Modifications/révisions du Code d'usages pour le stockage et le transport des graisses et huiles comestibles en vrac (CXC 36-1987) et besoins en données associés

Contexte :

Le CCFO28 a examiné les évaluations de sécurité du JECFA pour 23 substances en vue de leur acceptabilité en tant que cargaisons précédentes, ce qui a éclairé les modifications apportées au CXC 36-1987. Sur les 23 substances, 19 répondaient aux critères d'acceptabilité en tant que cargaisons précédentes, tandis que 4 ne le faisaient pas. Ces 4 substances sont : la cire de lignite, le lignosulfonate de calcium non alimentaire, l'anhydride acétique et le cyclohexane.

**Position :**

La République du Bénin soutient la modification proposée au CXC 36-1987.

**Justification :**

La décision de modifier/réviser le Code d'usages est fondée sur des conseils scientifiques solides issus de l'évaluation du JECFA.

**Cabo Verde****Standards and related texts submitted for final adoption:****Background:**

CCFO28 discussed and agreed with no objection to submit the following standards to CAC47 for final adoption:

- 1) Revision to the Standard for named vegetable oils (CXS 210-1999): Inclusion of avocado oil (*Step 8*);
- 2) Amendment/revision of the Standard for named vegetable oils (CXS 210-1999) to include camellia seed oil, sacha inchi oil and high oleic acid soya bean oil (*Step 5/8*);
- 3) Revision to the Standard for olive oils and olive pomace oils (CXS 33-1981): Update essential composition, quality factors and methods of analysis and sampling (*Step 5/8*); and
- 4) Revision to the Standard for fish oils (CXS 329-2017) to include calanus oil (*Step 5/8*).

**Position:**

Cabo Verde supports final adoption of the above revisions/amendments to standards and related texts on fats and oils by CAC47.

**Rationale:**

The standards are based on sound science, their adoption will promote consumer protection and safe trade.

**5) Amendments to the labelling provisions for non-retail containers in the six existing fats and oils standards (CXS 19-1981; CXS 33-1981; CXS 210-1999; CXS 211-1999; CXS 256-1999; and CXS 329-2017)****Background:**

CCFO28 agreed to amend the mentioned standards so as to include a provision of bulk labeling, making reference to CXS 346-2021 as required by the procedural manual. CCFO has requested CCFL to endorse these labeling provisions, hence forwarding the amendment to CAC47 for final adoption and inform CCFL accordingly.

**Position:**

Cabo Verde supports adoption of the draft amendments to the labelling provisions of non-retail containers in the 6 existing fats and oils standards.

**Rationale:**

The amendments are aligned to the procedures established for elaboration of Codex standards.

**6) Amendments/revisions to the Code of practice for the storage and transport of edible fats and oils in bulk (CXC 36-1987) and associated data needs****Background:**

CCFO28 reviewed JECFA safety evaluations for 23 substances for acceptability as previous cargoes which informed amendments to CXC 36-1987. Of the 23, 19 met the criteria for acceptability as previous cargoes while 4 did not. The 4 are: Montan wax, Non-food-grade calcium lignosulfonate, Acetic anhydride and Cyclohexane.

**Position:**

Cabo Verde supports the proposed amendment to CXC 36-1987.

**Rationale:**

The decision to amend/revise the Code of practice is based on sound scientific advice from JECFA evaluation.

**Proposals to elaborate new standards and related texts:**

## 1) New work on the proposed revision to Codex standards on fats and oils to reduce trans-fatty acid intake

### Background:

Recalling the history of discussions on trans fatty acids (TFAs) in several Codex subsidiary bodies, recommendations of WHO with regard to TFAs reduction, and the different approaches countries taken by countries to reach the WHO global target of elimination of industrially produced TFAs (iTFA) from the global food supply, CCFO28 evaluated a discussion paper on the proposal for new work focused on three fats and oils standards, namely, Standard for Edible Fats and Oils Not Covered by Individual Standards (CXS 19-1981), Standard for Fat Spreads and Blended Spreads (CXS 256-1999), and Standard for Named Animal Fats (CXS 211-1999) to include a prohibition on partially hydrogenated oils (PHO) and/or limits on industrially produced trans-fatty acids. There was general support for the new work proposal. Discussion of the proposal highlighted the need to consistently refer to iTFAs, which Members considered to be the main objective of the work. It was also noted that countries may take different approaches to reduce iTFAs and the revision of the standard should be sufficiently flexible to reflect that, thus referring to either prohibition of PHOs or limits on TFAs.

### Position:

Cabo Verde supports the approval of the project document to initiate work on revision of the 3 Codex standards to reduce trans-fatty acid intake TFAs.

### Rationale:

TFAs are a public health concern and there is a need to establish harmonized international measures to reduce their intake.

## 2) New work on a standard for microbial omega-3 oils

### Background:

At CCFO28, the Global Organisation for EPA and DHA omega 3s (GOED) presented the proposal noting that omega-3 oils from single celled microalgae for human consumption were a high value commodity with both production and global trade of these oils increasing. With a high content of EPA and/or DHA these oils were an important ingredient in an increasing variety of foods and food supplements. There was general support for this proposal. However, a few Members indicated that as the proposal did not take into account the safety aspects of this new commodity, they could not support the proposal. It was noted that different countries have different authorization processes for such products so that should not prevent the development of a standard. The Codex Secretariat clarified that the review of the project document was an opportunity for Members to add aspects they considered should be included in the proposal including the option of indicating that scientific advice was needed to support the work. It could also be identified in the course of elaboration of the standard. The Committee agreed to forward the work to CAC47 for adoption.

### Position:

Cabo Verde supports approval of the project document to initiate work on a standard for microbial omega-3 oil.

### Rationale:

There is a need to establish an international standard for microbial omega-3 oils to avoid the current state where these oils are traded with differences in information which present challenges for regulators. Thus, development of a Codex standard with quality, safety and compositional factors will ensure the protection of consumer's health and fair practices in trade of these oils.

## India

### Part 1:

1. Revision to the Standard for named vegetable oils (CXS 210-1999): Inclusion of avocado oil
2. Amendment/revision of the Standard for named vegetable oils (CXS 210-1999):
  - Inclusion of camellia seed oil
  - Inclusion of sacha inchi oil
  - Inclusion of high oleic acid soya bean oil
3. Revision to the Standard for olive oils and olive pomace oils (CXS 33-1981): Revision of Sections 3, 8 and Appendix1
4. Amendment to the Standard for fish oils (CXS 329-2017) - Inclusion of Calanus oil

5. Amendments to the labelling provisions for non-retail containers in the six existing fats and oils standards (CXS 19-1981; CXS 33-1981; CXS 210- 1999; CXS 211-1999; CXS 256-1999; and CXS 329-2017)
6. Amendments/revisions to the Code of practice for the storage and transport of edible fats and oils in bulk (CXC 36-1987) and associated data needs – List of acceptable previous cargoes (Chair: Malaysia)

### India supports these work for adoption

#### Part 2:

1. Revision to Codex standards on fats and oils to reduce trans-fatty acid intake
2. Standard for microbial omega-3 oils

### India supports these new work proposals.

## Philippines

### I. Final Adoption of Codex Texts

- **Revision to the Standard for named vegetable oils (CXS 210-1999): Inclusion of avocado oil**

The Philippines supports the inclusion of avocado oil in the CXS 210-1999. The Philippines' production of avocado is about 20,076MT per year (PSA, 2023).

Rationale:

Avocado oil has health benefits to humans and the Philippine consider this fruit tree an agricultural crop. Cultivation of which is going to improve in the Philippines once standard for avocado oil is established.

- **Amendment/revision of the Standard for named vegetable oils (CXS 210-1999):**

- **Inclusion of camellia seed oil**
- **Inclusion of sacha inchi oil**
- **Inclusion of high oleic acid soya bean oil**

The Philippines supports the inclusion of the following oil in the Standard for Named Vegetable Oils (CXS 210-1999):

- 1) Camellia seed oil
- 2) Sacha inchi oil
- 3) High oleic acid soya bean oil

Rationale:

The introduction of these oils, camellia seed ad sacha oil into the standard is a preface to the programs of the Philippines Department of Agriculture to venture into tea propagation and cultivation.

- **Revision to the Standard for olive oils and olive pomace oils (CXS 33-1981): Revision of Sections 3, 8 and Appendix**

The Philippines supports the revisions on Sections 3 and 8 and on the Appendix ref. CXS 33-1081. Sections 3 and 8 include ESSENTIAL COMPOSITION AND QUALITY FACTORS METHODS OF ANALYSIS AND SAMPLING.

Rationale:

Support to this section in the Codex standard to indicate the essential and quality factors of olive oils and olive pomace oils to determine more of its authenticity and health benefits.

- **Amendments to the labelling provisions for non-retail containers in the six existing fats and oils standards (CXS 19-1981; CXS 33-1981; CXS 210- 1999; CXS 211-1999; CXS 256-1999; and CXS 329-2017)**

The Philippines supports the amendments as indicated.

Rationale:

Enhancement of the labels of the non-retail containers of the six existing fats and oils standards is necessary to completely identify the kind of oil – this is based on the CXS 346 and on the generic provision set in the Procedural Manual.

- **Amendments/revisions to the Code of practice for the storage and transport of edible fats and oils in bulk (CXC 36-1987) and associated data needs**

The Philippines through the National Codex Organization (NCO) and the United Coconut Association of the Philippines (UCAP) supports the amendments, however, proposals for further amendments require in-depth review and scientific approach.

Rationale:

The results of the EWG validated the amendments/ revisions, however, keeping the non-food grade calcium lignosulfonate is requested to be evaluated immediately by JEFCA. Other works to be done is the establishment of new EWG to study/ evaluate data submitted on other previous cargoes for future consideration.

## **II. Proposals to undertake new work or revise a standard**

- **New work on the proposed revision to Codex standards on fats and oils to reduce trans-fatty acid intake.**

The Philippines supports the new on the proposed revision to Codex standards on fats and oils to reduce trans-fatty acid intake.

Rationale:

The Philippines has an existing law through the Department of Health (DOH) Administrative Order (AO) NO. 2021-0039, entitled "National Policy on the Elimination of Industrially-Produced Trans-Fatty Acids for the Prevention and Control of Non-Communicable Diseases". This AO prohibits industrially-produced TFA (IP TFA) from prepackaged processed food products due to the alarming global and local magnitude of the problem involving Non-Communicable Diseases (NCD).

- **New work on a standard for microbial omega-3 oils**

The Philippines supports the development of a new standard for microbial omega-3 oils. Traditionally, fish have been the primary source of omega-3, but this comes with significant drawbacks, including undesirable odor and flavor, heavy metal contamination, and the risk of overfishing and species extinction. Establishing a standard for microbial alternatives is essential to address these issues and ensure safe and sustainable omega-3 production.

## **Senegal**

### **Partie 1 – Normes et textes apparentés soumis pour adoption finale**

- **Révision de la Norme pour les huiles végétales portant un nom spécifique (CXS 210-1999) : Inclusion de l'huile d'avocat (étape 8) ;**
- **Amendement/révision de la Norme pour les huiles végétales portant un nom spécifique (CXS 210-1999) pour inclure l'huile de graines de camélia, l'huile de Sacha Inchi et l'huile de soja à haute teneur en acide oléique (étape 5/8) ;**
- **Révision de la norme pour les huiles d'olive et les huiles de grignons d'olive (CXS 33-1981) : mise à jour de la composition essentielle, des facteurs de qualité et des méthodes d'analyse et d'échantillonnage (étape 5/8) ;**
- **Révision de la norme pour les huiles de poisson (CXS 329-2017) pour inclure l'huile de calanus (étape 5/8).**

#### **Contexte :**

Le CCFO28 a discuté et a convenu de soumettre ces normes révisées à la CAC47 pour adoption finale.

#### **Position :**

Le Sénégal soutient l'adoption finale des normes révisées/amendées.

#### **Justification :**

Ces normes sont fondées sur des données scientifiques fiables, et leur adoption favorisera la protection des consommateurs et la sécurité commerciale surtout au niveau de nos pays grands importateurs d'huiles.

- **Modifications des dispositions relatives à l'étiquetage des récipients non destinés à la vente au détail dans les six normes existantes sur les graisses et les huiles (CXS 19- 1981; CXS 33- 1981; CXS 210- 1999; CXS 211- 1999; CXS 256- 1999; CXS 329- 2017).**

#### **Contexte :**

En réponse à la demande par la CAC44, le CCFO a approuvé les modifications de ces dispositions relatives à l'étiquetage des récipients non destinés au détail dans les 6 normes cités ci-dessus.

**Position:**

Le Sénégal soutient l'adoption finale des modifications des dispositions.

**Justification:**

Les amendements sont conformes aux procédures fixées pour l'élaboration des normes du Codex.

**Partie 3 – Propositions relatives à l'élaboration de nouvelles normes et de nouveaux textes apparentés**

- **Nouveaux travaux relatifs à la proposition de révision des normes du Codex sur les graisses et les huiles visant à réduire la consommation d'acides gras.**
- **Nouveaux travaux relatifs à une norme sur les huiles oméga-3 d'origine microbienne.**

**Position:**

Le Sénégal soutient l'approbation de ces nouveaux travaux.

**Justification:**

Les AGT sont une préoccupation de santé publique et il est nécessaire de définir les mesures internationales harmonisées pour réduire leur consommation.

L'élaboration d'une norme Codex avec des facteurs de qualité, de sécurité, et de composition, permettra de garantir une alimentation et de protéger la santé des consommateurs, et de garantir des pratiques loyales dans le commerce de ces huiles.

### South Africa

**Part 2: New work on the proposed revision to Codex standards on fats and oils to reduce trans-fatty acid intake**

**SA comments:** SA supports the proposed New work on the revision of Codex Standard on fats and oils to reduce trans-fatty acid intake.

**Rationale:** The proposed revision would be inline with the work done by the WHO, including the REPLAC Action plan as an approach to help countries to eliminate Trans fats in the food supply

### Syrian Arab Republic

This conference room document (CRD) is introduced by the Arab Republic of Syria in relation with the upcoming discussion at the 47<sup>th</sup> Session of the Codex Alimentarius Commission of the possible adoption of the revised standard on Olive Oil (CXS33-1981), with the aim to highlight **the inability of a large segment of the Virgin Olive Oil production sector (up to 40%) in Syria** to achieve the standard, due to natural variability of sterol levels, not accounted for in the way the standard was developed.

This will lead to important negative repercussions on the Syrian agricultural sector and economy due to inability to access export markets, which could consider authentic Syrian Olive oil not to be authentic anymore as a result of some provisions in the proposed standard revision.

Syria expressed its reservation on the adoption of the proposed revision of CXS33-1981, at the last session of the Codex Committee on Fats and Oils (CCFO28).

This reservation should in fact be considered as **an objection** to such adoption at CAC47, if no other mitigation measure is considered, stemming from:

- the foreseen considerable negative repercussions on the Syrian Olive Sector and overall agricultural exports, and
- Syria's consideration of the way its position was addressed during the CCFO proceedings

Syria's objection relates to the fact that one provision of the revised standard, associated with the level of  $\Delta$ -7 Stigmastenol (under section 3.2.3) would lead to over 40% of the Syrian production of **authentic** Virgin Olive Oil be considered as NON-AUTHENTIC i.e., possibly considered as adulterated with other vegetable oils/seed oils:

Syrian Virgin Olive Oil, shows a natural variation in Sterol content, leading to the levels of  $\square$ - 7 Stigmastenol to exceed regularly **the 0.5 value** (levels reported vary from 0.2 to higher than 0.5, according to (Abaza, L.



and al., 2015<sup>1</sup>; Mansour, A. and al., 2017<sup>2</sup>; Jbara, G. and al., 2010<sup>3</sup>).

While footnote c) offers a possible correction for such deviation, the decision tree applied and stemming from the determination by the Olive oil council, limits the **ΔECN42 to be equal to or lower than 0.1**, where this value was generally determined to be unachievable for Syrian Olive oil, reaching the values of 0.15 to 0.16.

For Syrian Olive Oil to be compliant with the requirements of this decision tree, the value attributed to the □ECN42 parameter (as expressed in footnote c) needs to be **0.2**, similar to what was listed in section 3.2.2 for virgin olive oil (a general provision for the value to be attributed to ΔECN42 for Virgin Olive Oil **set at 0.2** or lower).

The decision by the Committee to remove the previously proposed footnote stating that : “ Virgin Olive Oil authenticity is not compromised if one sterol, or their minimum content does not fall within the ranges provided for all other sterols and parameters tested referred to in this standard fall within the stated ranges” removes any flexibility for a big segment of the production of Syrian Virgin Olive to achieve the parameter stated under footnote c.

While Syria may support the removal of such a footnote, **contributing to the consensus** reached at the Committee discussions, Syria requires that the level of ΔECN42 be adjusted to reach **0.2** in footnote c.

Syria noted that during the CCFO28 meeting proceedings, the request of a Codex member to adjust another parameter under footnote b) for the level of Campesterol moving the higher interval for this sterol from 4.5 to **4.8** was granted by the committee with no discussion nor provision of any data from that member, while Syria's request for □ECN42 under footnote c) was ignored.

Syria would like to note that the decision tree adopted by the CCFO and referring to previous work of the International Olive Oil council does not account for Syrian Data, given that Syria was excluded from the work of the Council for several years and Syrian input into such international work has been hampered by the exceptional situation Syria endured over the past few years.

Nonetheless, the Syrian delegation to Codex has spared no effort, over the past period, and during the deliberations of the CCFO (both in the EWG and during the plenary of CCFO28) to voice its comments and its position, substantiated with information collected from Syrian Authentic Virgin Olive Oil. This is despite the continued hardships that the Syrian Codex delegations endured to participate either in virtual meetings or physical meetings of the CCFO and its working groups.

While Syria appreciates the consideration by the Chair, as reported under paragraph 73 of the CCFO28 report, to call for the collection of more data on this issue and to enable the creation of an EWG, to examine results of studies showcasing geographic differences related to the levels of Sterol, such work is not reflected in the conclusion stated in paragraph 85 of the same report, where the only provision that the EWG intended to be formed would examine are associated with the levels of PPP and 1,2-DAG.

Therefore, the adoption of the proposed revision of CXS33-1981, under these conditions and with no consideration for Syria's situation will have tremendous repercussions on Syrian exports of Virgin Olive oil, a key agricultural sector and contributor to the Syrian economy, and an important source of income to countless of farmers, and workers in the olive oil production sector in Syria.

Syria is cognizant of the immense efforts deployed by the EWG tasked with the revision of the olive oil standard and the efforts made by the Chair of CCFO to reach consensus. As a result, Syria **would not object in a manner that would halt the advancement of the standard** but **requests a mitigation strategy be duly considered** to prevent the negative repercussions stemming from the adoption of the standard at Step 5/8 with no consideration of it being unachievable by Syrian producers.

Syria's proposal is to consider one of the possible options described below or any other alternative that would achieve a similar outcome:

**Option 1:** that CAC47 considers the change of the value of ΔECN42 under footnote c) to be set **at 0.2** or lower (in alignment with section 3.2.2 of the standard), in the same way that another member's request was considered at CCFO for Campesterol under footnote b.

**Option 2:** to consider the adoption of the revision of CXS33-1981, but to **suspend the application of the provision related to footnote c)** and to include the study of the natural variation of sterols and the update to the authenticity decision tree, as part of the scope/terms of reference of the EWG meant to be created

<sup>1</sup> Abaza, L. and al. (2015). Olive oil composition of Syrian olive varieties and comparisons with other Mediterranean countries. *Journal of the American Oil Chemists' Society*, 92(4), 593-60.

<sup>2</sup> Mansour, A. and al. (2017). Chemical characteristics of Syrian olive oils. *Journal of Food Composition and Analysis*, 58, 8-12.

<sup>3</sup> Jbara, G. and al. (2010). Fruit and Oil Characteristics of the Main Syrian Olive Cultivars. . *Italian Journal of Food Science*, 22(4), 395-400.

as recommended by CCFO28. Syria commits to providing all the data needed to support its position, enabled by collaborations from the international food science and technology community.

Any other option that the Chair of CAC/CCFO may suggest and which would achieve a similar outcome.

Syria seeks that the revision of an important Codex standard such as CXS33-1981 be more wholly evidence based.

Syria thanks members of Codex Alimentarius Commission for the consideration given to its motivated objection on the adoption of the revision of CXS33-1981.

#### **United Republic of Tanzania**

##### **Tanzania Position**

Tanzania supports approval of new work proposals and adoption of the standards and related texts as recommended by CCFO28.

#### **East African Community (EAC)**

EAC supports approval of new work proposals and adoption of the standards and related texts as recommended by CCFO28.

#### **The Global Organization for EPA and DHA Omega-3s (GOED)**

### **PROPOSAL FOR NEW WORK ON A STANDARD FOR MICROBIAL OMEGA-3 OILS**

#### **(For approval)**

The Global Organization for EPA and DHA Omega-3s (GOED) supports the approval of the proposal for new work to develop a Codex Standard for Microbial Omega-3 Oils that will be considered by the 47<sup>th</sup> Session of the Codex Alimentarius Commission (CAC47) under agenda item 4.2 "Codex Committee on Fats and Oils".

Annex II of the Codex document CX/CAC 24/47/4 August 2024 includes the Project Document on the Proposal for New Work on a Standard for Microbial Omega-3 oils agreed by the 28<sup>th</sup> Session of the Codex Committee on Fats and Oils (CCFO28). CCFO28 also agreed to establish an Electronic Working Group (EWG) chaired by the United States of America and co-chaired by China to prepare the proposed draft standard for circulation for comments at Step 3 and consideration by CCFO29.

The purpose and scope of this new work is to establish an inclusive and overarching Standard providing a harmonised description containing quality and compositional factors for microbial omega-3 oils, for use as an ingredient in foods and food supplements where these are regulated as food.

Establishing a Codex Standard for microbial omega-3 oils containing quality and compositional factors will ensure fair practices in trade in these commodities as well as ensure consumers' health protection, which are the purpose and goals of the Codex Alimentarius.

In this sense, GOED looks forward to the CAC47 agreement to approve the new work to develop a Standard for Microbial Omega-3 Oils, as presented in the project document agreed by CCFO28.