

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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Agenda Item 5

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FATS AND OILS

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### PROPOSED DRAFT REVISION TO THE *STANDARD FOR OLIVE OILS AND OLIVE POMACE OILS (CXS 33-1981)* – REVISION OF SECTIONS 3, 8 AND APPENDIX

(Comments of Syrian Arab Republic)

These comments were developed by the delegation of Syrian Arab Republic, we would like to thank Committees of CCFO28 for their efforts and take the opportunity to highlight the comments on agenda item 5.

#### **GENERAL COMMENT:**

Syria appreciates the opportunity to provide comments on the proposed draft of revision of the standard for olive oils and olive pomace oils (CXS 33-1981) and thanks the Chair and Co-chair for leading the EWG to progress this work. Syria generally agrees with the proposed revision of the draft, with the exception of those mentioned under specific comments.

Although, Syria comments will focus in items still in square brackets. We also find that this draft is biased towards supporting the trade of lampante olive oil at the expense of virgin olive oil, which has healthy and nutrition advantages. We refer here that this standard is considered part of olive oil production of producing countries which classifies ordinary virgin olive oil as inedible oil and convert it into refining only when it does not meet one of quality criteria, even sensory ones. While many countries have food crisis and lack of food security, especially on sources of natural fat and oils.

We mention here what was agreed during CCFO27, where the deletion of the ordinary virgin olive oil category from the list of edible oils was postponed and the producing countries were given a time limit up till CCFO30 to improve the quality of their production and reducing the quantities of ordinary virgin olive oil by application of a good agricultural practices and develop the technical of processing to improve the quality of its olive oil production.

Also we have some concerns related to few clauses that has technical and editorial error that required to be noted as the following:

#### **SPECIFIC COMMENT:**

**3.1 Designations and definitions:** Syria emphasizes its view that it would be preferable to keep footnote<sup>2</sup>: "*This product may only be sold direct to the consumer if permitted in the country of retail sale*" in the standard in order to maintain the advantage of olive oil compared with other types of refined vegetable oils mentioned in the codex standard by mixing refined olive oil with virgin olive oil to enhance its health and organoleptic properties.

Syria considers the note mentioned in point 3.1: "*Genuine virgin olive oil that does not meet one or more of the virgin olive oil's quality criteria of this standard is referred to as LAMPANTE OLIVE OIL. It is considered unfit for human consumption either as it stands or blended with other oils*", should not be remained in the document, it may have a significant negative impact on international trade, it will change the classification of large part of virgin olive oils into lampante olive oils in the absence of one of the positive flavor or presence of sensory defect (Organoleptic characteristics). Consequently we will lose a large part of virgin olive oil as food, despite the lack of scientific evidence or studies proving its harm if used in nutrition, while many countries in the world face a major food gap and food insecurity, especially in providing natural resources of dietary oil and fats.

**3.2.1 GLC ranges of fatty acid composition:** It is preferable to delete the last sentence in paragraph 3.2.1 *“However, to provide clarity in the trade of lampante olive oil and crude olive-pomace oil, the values of the table, trans isomers excluded, may also be applied”*. Since lampante oils and crud pomace olive oil are not considered edible to be included in the Codex Standards. Therefore, Syria requests amending the header of the fist list of fatty acid value in GLC ranges of fatty acid composition by adding ordinary virgin olive oil to the rest of the other categories of virgin olive oils (extra virgin olive oil- virgin olive oil).

Syria also kindly confirms its request regarding raising the maximum limit for arachidic acid (C20:0) for 0.8% as confirmed by studies that determined the fatty acid content of most Syrian olive oils, which were carried out in cooperation with international research centers.

For the minimum value of oleic acid (C18:1) of [53%] or [55%] in the same section 3.2.1: Syria supports maintaining the minimum value of oleic acid (C18:1) to 55.0% and not to expand its range more than it is. Especially with the facts that we have many high oleic acid vegetable oils.

For footnote associated with values of C18:3 in the same section 3.2.1: Syria supports the proposed minimum value of  $L_n \leq 1.0\%$  and the use of decisional trees as a footnote for the olive oils with  $1.0 < L_n \leq 1.4\%$  to guarantee the authenticity of olive oil

Regarding the “Trans fatty acids” mentioned in clause 3.2.1: Symbol  $\geq$  should not be deleted, so please keep it.

### **3.2.3 “4 $\alpha$ -Desmethylsterols composition”:**

Regarding 3.2.3 footnote on a general statement on sterols in virgin olive oil **“Virgin olive oil’s authenticity is not compromised if one sterol, or their minimum content, does not fall within the ranges provided for, if all other sterols and parameters tested referred to in this standard fall within the stated ranges”**: Syria support keeping footnote of paragraph 3.2.3 on a general statement on sterols in virgin olive oil, because this footnote ensures fairness in describing virgin olive oil that its content of  $\Delta^7$ stigmasterol more than 0.5%, without taking into account the value of  $\Delta$ ECN which is determined according to the fatty acid composition and triglycerides, which are greatly affected by climatic and environmental conditions, therefore unconfirmed only one sterols compound does not mean that the oil not authentic if it confirmed the other purity criteria.

Would also like to note the need for replacement the letter "y" in the footnote “b” by word "and", in addition to  $\Delta$ ECN value at the end of the same footnote should be put into absolute value like this  **$\Delta$ ECN42  $\leq$  [0,4]**.

**3.3.1 Organoleptic characteristics of virgin olive oils:** Syria supports raising the limit of the median of the most intense defect in the category of virgin olive oil to 3.5 instead of 2.5. And supports the addition of a footnote refers that this limit includes the uncertainty predicted by the IOC method.

**3.3.5  $\Delta$ K<sup>(f, g)</sup>:**  $\Delta$ k is a calculated value, not a composition factor, therefore it should be at quality criteria in the item 3.3.5 in this document.

Syria noted that the sign “-” in  $\Delta$ k’s equation is incorrect. So kindly replace it by sign “+” instead of “-”, and place the whole equation of  $\Delta$ K within absolute value.

**3.6 Fatty acid ethyl esters:** It is preferable to delete fatty acid ethyl esters value until more studies are conducted, and suggests to give countries more time by adding a footnote refers to that it’s adoption is pending till CCFO30.

**Appendix I: 1.5 1,2-diglycerides:** Syria support the deletion of diglycerides provisions form this standard until more studies are conducted on all environmental and technical factors that affect the content of these diacylglycerol compounds in olive oil are clarified.

**Appendix I: 1.6 Pyropheophytin:** Syria supports the deletion of pyropheophytin (% total chlorophyll pigments) from the standard until more national studies are conducted.

Syrian Arab Republic appreciates the opportunity offered to submit this Conference Room Document, and we hope to consider our comments.