CODEX ALIMENTARIUS COMMISSION



Food and Agriculture Organization of the United Nations



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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FATS AND OILS Twenty-Seventh Session Virtual, 18 - 26 October 2021 REPORT ON THE REVIEW OF NEW WORK PROPOSALS

Prepared by CCFO Secretariat (Malaysia)

Background:

1. Monitoring of standard development under CCFO for the establishment of work priorities in the Procedural Manual as well as the requirements for addition of fats and oils to standards developed by CCFO16, had been discussed extensively in CCFO25 and CCFO26 in considering a better way to manage the heavy Committee's overall workload. Based on request by CCEXEC70, CCFO Secretariat prepared a discussion paper on better work management of new work proposals to be discussed in CCFO26. CCFO26 agreed to establish an in-session working group to screen all new work proposals and related project document for completeness against the related criteria in the Codex Procedural Manual and the decision of CCFO16 taking into account written comments received from members on the proposals, to assess whether information provided fulfils the requirement for the new work proposed and make recommendation to the plenary through a report that will be presented therein.

2. Due to current Covid19 situation and that CCFO27 will be held virtually, it would not be feasible to convene an in-session working group as agreed in CCFO26. In order to facilitate the discussion at the plenary, Codex Secretariat had issued a Circular Letter requesting for comments from CCFO members on the proposals for new work and whether information provided in the proposals meets the requirement in the Codex Procedural Manual. Codex Secretariat had compiled and forwarded the comments to CCFO Secretariat to review and prepare CRD with proposed recommendations for consideration by the plenary.

3. The CL 2019/54-FO was issued in July 2019 with a deadline of December 2020 requesting for new work proposals including amendments to existing standards. In reply to the CL, six (6) proposals were submitted. Subsequently, circular letters CL 2021/36/OCS-FO and CL 2021/58/OCS-FO were issued in June 2021 and July 2021 respectively calling for comments from members with deadline on 16 September 2021.

Review Process on the Proposals

4. Based on the decision in CCFO26 to better manage new work proposals and the request in CLs as in paragraph 3 above, CCFO Secretariat conducted the review process of each new work proposal in two parts:

- i) Summarise country comments on the completeness against the requirement of criteria for the establishment of work priorities from the Procedural Manual, and
- ii) Summarise country comments on the support for the new work.

5. In addition, CCFO secretariat also reviewed the completeness of each new work proposal based on CCFO16 decisions related to requirements on Proposal of New Standard or Inclusion of New Oils/Fats, and CCFO26 decision on better management of the work of CCFO.

Outcome of the Review

6. The outcome of the review is prepared for each of the new work proposals and annexed to this CRD for consideration by the plenary. All country comments received are summarised in terms of completeness with additional findings by CCFO Secretariat as well as country support for the new work proposals.

7. Based on input received from Members, CCFO Secretariat noted that a checklist may be useful to assist sponsors in preparing future new work proposals. In this regard, a checklist has been prepared and proposed by CCFO Secretariat to be published as an information document in the Codex website. This document lists the criteria for the establishment of work priorities from the Procedural Manual, CCFO16 decisions related to requirements on Proposal of New Standard or Inclusion of New Oils/Fats, and CCFO26 decisions on better management of the work of CCFO in one document.

Recommendation

- 10. The Committee is invited to consider:
 - (a) the outcome of the review of each new work proposal in the following Annexes:
 - i. Annex I Part I Proposed Amendment/Revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) Inclusion of Camellia seed oil.
 - ii. Annex II Part II Proposed Amendment/Revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) Inclusion of Mahua oil.
 - iii. Annex III Part III Proposed Amendment/Revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) inclusion of Sacha Inchi oil.
 - iv. Annex IV Part IV Proposed Amendment/Revision to the Standard For Fat Spreads And Blended Spreads (CXS 256-2007): Sections 2 (Description) And 3 (Essential Composition And Quality Factors).
 - v. Annex V Part V Proposed Amendment/Revision to the Codex Standard for Fish Oil (CXS 329-2017) Inclusion of Calanus oil.
 - vi. Annex VI Part VI Proposed Amendment/Revision to the Codex Standard for Named Vegetable Oils to include high oleic acid soyabean oil.
 - (b) the proposed information document for CCFO new work proposals as in Annex VII.

Annex I

PART I - PROPOSED AMENDMENT/REVISION TO THE CODEX STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999), - INCLUSION OF CAMELLIA SEED OIL

(Submitted by the People's Republic of China)

1. Comments for the Proposed Amendment/Revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – Inclusion of Camellia Seed Oil were received from Brazil, Canada, Colombia, Cuba, Ecuador, Egypt, European Union, Iran, Iraq, Kenya, Malaysia, Panama, Uganda and USA.

2. The review outcome are as follows:

Completeness of the new work proposal

3. 10 countries expressed their support and agreement with the project document.

4. Canada and Malaysia highlighted incompleteness in volume of production and consumption in individual countries; and volume and pattern of trade between countries.

5. Malaysia also highlighted that a Discussion Paper is also to be submitted in accordance with the requirements set REP19FO. Some of the criteria established by the 16th Session of the CCFO (1999) on specific information required when proposing the addition of new oils to the Standard for Named Vegetable Oils also were not fulfilled.

6. Iran commented that Camellia Seed Oil is considerable as new source origin edible oil and fat. It would be suitable to present toxicological tests or similar documents if exists to ensure its suitability to be consumed.

7. European Union commented that the first sentence of section 2 (Relevance and timeliness) of the project document should be deleted as it suggests that camellia oil may be marketed as a substitute to olive oil. Data on composition (sterols and tocopherols) should be completed.

Support for the proposed new work

8. 10 countries expressed their support for this new work to be undertaken by CCFO.

9. Malaysia may support this new work provided relevant data/information pertaining to the volume of global production and consumption, global trade volume, and essential composition and quality factors of Camellia seed oil from other countries are available.

10. Canada commented that the data provided on the volume of production, consumption and regional and international trade in this oil is limited and may not be sufficient to warrant its consideration as new work for CCFO at this time.

PART II – PROPOSED AMENDMENT/REVISION TO THE CODEX STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999), - INCLUSION OF MAHUA OIL

(Submitted by India)

1. Comments for the Proposed Amendment/Revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) to include Mahua Oil were received from Brazil, Canada, Colombia, Cuba, Ecuador, Egypt, European Union, Iraq, Iran, Kenya, Malaysia, Panama, Saudi Arabia, Uganda and USA.

2. The outcome of the review are as follows:

Completeness of the new work proposal

3. Egypt and Iraq expressed their agreement with the project document. In addition, Panama recommended for the new work proposal to proceed to the next step.

4. 6 countries (Canada, Kenya, Malaysia, Uganda, Iran dan European Union) highlighted incompleteness in the project document. Canada, Kenya, Malaysia and Uganda commented that no data were provided on the volume of production and consumption in individual countries, volume, pattern of trade between countries and information related to international market potential.

5. Iran commented it would be suitable to present toxicological tests or similar documents if exists to ensure its suitability to be consumed since Mahua Oil are considerable as new source origin edible oil and fat.

6. European Union commented that Mahua oil is not defined as other named vegetable oils, but the name is used for several oils of different botanical origin. This approach has to be clarified in the definition and has to be agreed on by all Codex Members (Indian illipe butter versus Malaysian illipe butter). In addition, data on composition (fatty acids, sterols and tocopherols) as well as data on chemical and physical characteristics should be completed and given in the same format as for other oils in CSX 210-1999.

Support for the proposed new work

7. Brazil, Colombia, Cuba, Ecuador, Egypt, Saudi Arabia and USA expressed their support for the new work. Malaysia can support the proposal pending submission of discussion paper and additional information not provided in the project document.

8. Canada does not support consideration of this new work proposal at this time since no data were provided on the volume of production, consumption and regional and international trade of this oil at the present time.

PART III - AMENDMENT/REVISION TO THE CODEX STANDARD FOR NAMED VEGETABLE OILS (CXS 210-1999) - INCLUSION OF SACHA INCHI OIL

(Submitted by Peru)

1. Comments for the Proposed Amendment/Revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) – Inclusion of Sacha Inchi Oil were received from Brazil, Canada, Chile, Colombia, Cuba, Ecuador, Egypt, European Union, Iraq Malaysia, Panama, Peru, Thailand and USA.

2. The review outcome are as follows:

Completeness of the new work proposal

3. 12 countries expressed their support and agreement with the project document.

4. Malaysia highlighted incompleteness in volume of production and consumption and pattern of trade between countries. Malaysia also highlighted that some of the criteria established by the 16th Session of the CCFO on specific information required when proposing the addition of new oils to the Standard for Named Vegetable Oils were not fulfilled. For example, the data provided on volume of production is very limited. Data has been provided on volume of international trade. However, the data is limited to Peru's exports and no data is provided on actual global trade of sacha inchi oil.

5. European Union commented that all data in tables (fatty acids, chemical and physical characteristics, sterols and tocopherols) should be completed and given in the same format as for other oils in CSX 210-1999.

6. In addition, CCFO Secretariat observed that information on: i) coverage of the main consumer protection and trade issues by existing or proposed general standards; ii) number of commodities which would need separate standards indicating whether raw, semi-processed or processed, including information on the rationale for such needs; and iii) information on work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies), including an analysis of areas of potential complementarities, gaps, duplication, or conflict with the above activities are not provided in the project document as required in the Criteria for the Establishment of Work Priorities: Criteria Applicable to Commodities by the Procedural Manual.

Support for the proposed new work

7. 12 member countries expressed their support for this new work to be undertaken by CCFO.

8. Malaysia may support this new work provided relevant information pertaining to volume of global production and consumption, and pattern of trade between countries are available.

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PART IV – PROPOSED AMENDMENT/REVISION TO THE STANDARD FOR FAT SPREADS AND BLENDED SPREADS (CXS 256-2007): SECTIONS 2 (DESCRIPTION) AND 3 (ESSENITIAL COMPOSITION AND QUALITY FACTORS)

(Submitted by the European Margarine Association (IMACE))

1. Comments for the Proposed Amendment/Revision to the Standard for Fat Spreads and Blended Spreads (CXS 256-2007) were received from Brazil, Canada, Chile, Colombia, Cuba, Ecuador, Egypt, European Union, India, Indonesia, Iran, Kenya, Malaysia, Panama, Saudi Arabia, Thailand, Uganda and United States of America.

2. The outcome of the review are as follows:

Completeness of the new work proposal

3. Canada expressed their views that the discussion paper is a bit "weak" in that it provides the organization's rationale for the new work, but it seems it is not reflective of any circular letter seeking members' input on this specific topic, what are the issues with the current standards and names, etc. This document would benefit from a circular letter with specific questions posed to members that would then enable the development of a stronger and more informed discussion paper and project document before new work could be considered.

4. Other comments by Canada: potentially more controversial proposals such as the category "plant butter" to replace margarine, supports aligning the definition for Fats Spreads and Blended Spreads with the definition for dairy fat spreads, there are concerns however with regards to some of the proposed classification and common names and there are questions whether calorie-reduced terms could be used as well, for example, "Calorie-Reduced Margarine" is a standardized food in Canada.

5. Indonesia commented that the description of fat spreads and blended spreads needs to be revised. The current description contained the term "plastic" which gave a negative perception to consumer and potentially create a trade problem due to misleading information.

6. Iran commented that they need a maximum limit for milk fat in blended spread that might be 30% due to economic and rheological issue and the important point is differentiation these origin to each other. It is not as much as easy to detect amount less than 20 percent milk fat in blended fat by international standard method and then regarding to value difference between two sources, evaluation of claim on label and price make some challenges.

7. Chile commented that due the industry's technological development, some products exist today that are not currently included in the Codex Standard for Fat Spreads and Blended Spreads (CXS 256-2007), which therefore needs to be updated.

8. Colombia commented that the products covered by this standard are foods that are a spreadable emulsion principally of the type water-in-edible fats and oils. The proposal to amend the term "plastic" is considered relevant and they supported its modification.

9. Other comments by Colombia: the amendments suggested in Plant Spreads directly exclude the use of dairy fat, which increases production costs for those countries that do not produce plant-fat, they do not agree with creating a category for plant spreads, because such category would be included in the classification as a spread, Resolution 2154 does not contain the term "plant butter" which is the rationale being used to include a specific standard for plant spreads, the definitions in Resolution 2154 of 2012 include margarines and table and cooking spreads ("margarinas y esparcibles de mesa y cocina") defined as products with a soft consistency made of an emulsion of edible oils and/or fats of plant or animal origin (milk or milk and marine derivatives) and many margarines in the industry contain milk, or milk whey, which is a derivative, and consider this classification as appropriate.

10. The European Union opposed replacing the well-established term "fat spread" with the term "plant spread". The EUMS also opposed renaming "margarine" as "plant butter" as this would mislead the consumer and go against General Standard for the Use of Dairy Terms (CXS 206-1999).

11. India supported the new work proposal, with disagreement on the inclusion of term plant butter. The maximum limit of fat percentage in plant spread/ plant fat may be omitted and keep the minimum percentage only because the food business operators in India are producing plant spread having total fat up to 90%.

12. Kenya supported the revision of the standard as proposed and notes that the project document is in compliance to the procedural manual. However, the project document proposes names of the products that in our view should be introduced for comment at step 3. As a result, they proposed that the clause on main aspect to be covered be revised such that it captures roman i & ii of the project documents and expunge the specific names as proposed.

13. Malaysia commented that based on the data provided, there is significant trade in fats and blended spreads. However, it is not clear if the data will be similar for 'plant butter', 'plant spread' or 'blended spread'. Malaysia also commented that there is no evidence for impediment to international trade of the product due to the existing standard CXS 256-2007 and to support the suggestion in the Project Document that the proposed revision would enhance international trade in the product, or its raw materials. The existing standard CXS 256-2007 already adequately protects the consumer and facilitates trade. The proposed amendments do not add any additional coverage. The proposed use of the term 'plant butter' is probably inconsistent with or against national legislations in several countries.

14. Thailand had no objection on adding Plant Spreads in CXS 256-2007.

Support for the proposed new work

15. Brazil, Chile, Colombia, Cuba, Ecuador, Egypt, Indonesia, Panama, Saudi Arabia, Uganda and United States of America expressed their support to the new work proposal.

16. The United States of America supported the proposal to revise the Standard for Fat Spreads and Blended Spreads (SCS 256-2007). The standard has not been revised for many years and the characteristics of products in this category have changed over time due to changes in dietary preferences. Therefore, the United States supported that CCFO undertake work to update the standard to define more accurately and fairly the characteristics of products currently traded in this category. The United States believed the proposal needs a member to sponsor it before proceeding.

17. Malaysia did not support the new work proposal. Malaysia expressed the views that the proposal to amend/revise the Standard for Fat Spreads and Blended Spreads CXS 256-2007 is not supported as the existing standard already adequately protects the consumer and facilitates trade. The replacement of the term "margarine" with "Plant butter" would cause the former term to disappear in the future. The use of the term "Plant butter" may also have legal implications in some countries.

18. Thailand expressed her view that current CXS 256-2007 allows the use of any milk fat content of no more than 3% of the total fat content in sub- section 3.1.1.1. Therefore, Thailand would like to seek clarification on the missing range of the lower value 0-3% of milk fat content.

19. Other views expressed by Members: Canada commented that the discussion paper and project document would benefit from a circular letter to seek input from member countries, with specific questions posed to flush out what are the issues with the current standards, categories and names used, etc. This would then enable the development of a stronger and more informed discussion paper and project document before new work could be considered.

Annex V

PART V – PROPOSED AMENDMENT/REVISION TO THE CODEX STANDARD FOR FISH OILS (CXS 329-2017) – INCLUSION OF CALANUS OIL

(Prepared by Norway)

1. Comments for the Proposed Amendment/Revision to the Codex Standard for Fish Oils (CXS 329-2017) – Inclusion of Calanus Oil were received from Canada, Chile, Columbia, Cuba, Ecuador, Egypt, India, Iran, Kenya, Panama, Peru, Saudi Arabia Uganda and GOED (<u>The Global Organization for EPA and DHA</u>).

2. The outcome of the review is as follows:

Completeness of the new work proposal

3. Canada, Chile and Malaysia highlighted incompleteness in volume of production and consumption in individual countries; and volume and pattern of trade between countries. In addition, Canada observed that there was no data on how much was actually exported to the various countries mentioned. It would be helpful if more information could be provided in this area.

4. Chile highlighted that this oil is produced in small quantities and does not seem to meet the mandatory requirements for the inclusion of new work. In addition, these organisms are vitally important for trophic networks, since they have a key role in the Arctic sea water food web and their harvesting could damage the marine ecosystem.

5. Malaysia highlighted that consumption and trade data are not provided. In addition, no data has been provided to indicate the international or regional market potential of Calanus oil.

Support for the proposed new work

6. 11 Member countries (Canada, Columbia, Cuba, Ecuador, Egypt, India, Iran, Kenya, Panama, Saudi Arabia, Uganda) and GOED expressed their support for this new work, while Chile does not support this work to be undertaken by CCFO.

7. Malaysia may support this new work provided relevant data, including trade volume and consumption data to prove that there is substantial trade between countries, and sufficient essential composition data is available.

PART VI - PROPOSED AMENDMENT/REVISION TO THE CODEX STANDARD, FOR NAMED VEGETABLE OILS (CXS 210-1999), - INCLUSION OF HIGH OLEIC ACID SOYA BEAN OIL

(Submitted by the United States of America)

1. Comments for the Proposed amendment/revision to the Codex Standard for Named Vegetable Oils (CXS 210-1999) to include high oleic acid soyabean oil were received from Australia, Canada, Chile, Colombia, Cuba, Egypt, India, Iran, Kenya, Malaysia, Panama, Peru, Saudi Arabia, and FEDIOL.

2. The outcomes of the review are as follows:

Completeness of the new work proposal

3. Colombia and Egypt expressed their agreement with the project document. In addition, Panama recommended for the new work proposal to proceed to the next step.

- 4. Canada commented:
 - This work proposal has been introduced in previous sessions of the CCFO, notably at CCFO 22 (in 2011, see REP11/FO) and CCFO23 (in 2013, see REP13/FO). Reports of the discussions indicated that the Committee at those times concluded that the volume of production and international trade was not high enough to warrant consideration as new work.
 - Comparison of data on volumes of production and international trade in the project documents in 2013 and 2021 showed that production of this oil has considerably increased in nearly a decade.
 - However, the volume in international trade has remained low (230 MT in 2012 and 300 MT in 2020). Canada expressed its interest to know the reasons for the low volumes in international trade for high oleic soybean oil, to understand whether there might be some consideration that could be sought for this criteria for new work proposals.
 - Information on countries that trade in this oil, how much volume is traded, including how it is named, and any impediments to the trade of this oil would also be important for consideration.

5. Iran commented that there is a need to include a discrimination test to detect other vegetable oils with a similar fatty acid composition in high oleic soybean to have a fair trade and also as a tool for importers. It further suggested that triacylglycerol composition to be included for the mentioned purpose.

6. Malaysia commented that while the volume of production in the United States is provided, no data is provided for production in other countries as well as consumption and trade patterns between countries. The proposals also provided information on the expected increase in hectarage, however data for production or export was not provided at the point of time. Malaysia also noted that Discussion Paper is not provided as required in CCFO26.

7. In addition, CCFO Secretariat observed that information on fatty acid composition for high oleic acid soybean (oleic acid and linolenic acid) is not provided in the project document as required by CCFO16.

Support for the proposed new work

8. 5 countries (Colombia, Egypt, India, Panama and Saudi Arabia) and FEDIOL expressed their support for the new work.

9. Canada highlighted that while there appears to be an increase in the actual volume of production of this oil in the USA, the actual volume in international trade remained low at only 300 metric tons in 2020 as compared to 230 MT in 2012. Canada is of the view that the data may not be enough to warrant its inclusion in the Codex Standard CXS 210-1999 at this time, unless the sponsor provides a strong justification, acceptable to the Committee, for reconsideration of the criteria on volume in international trade of this oil.

10. Iran commented that it would be very useful to have a virtual meeting at least with EWG members before submitting the final documents to the members and also final approval. However, Iran also noted that further comments and explanation from sponsor during the session will be important to be considered.

- 11. Malaysia highlighted:
 - This proposal may only be supported pending submission of the Discussion Paper, relevant data on trade between countries intra and inter regional, relevant data on essential composition and quality factors as well as evidence for apparent resultant and possible impediments to international trade in the absence of a standard for high oleic acid soyabean oil.
 - In addition, some of the criteria established by the CCFO16 on specific information required when
 proposing the addition of new oils to the Standard for Named Vegetable Oils (CXS 210-1999) as
 agreed in paragraph 132(iii) (a) also were not fulfilled, such as the current level of international
 trade of high oleic acid soya bean oil is less than 1% of its production. Hence, amount traded is
 negligible compared to its production.

PROPOSED INFORMATION DOCUMENT FOR CCFO NEW WORK PROPOSALS

This information document is to assist sponsors in preparing new work proposals for CCFO consideration, based on the following requirements:

- a. Section II: Elaboration of Codex Texts of the Procedural Manual of the Codex Alimentarius Commission.
 - i. Part 2 of the Procedures for the Elaboration of Codex Standards and Related Texts pertaining to critical review of Proposals to Undertake New Work or to Revise a Standard.
 - ii. Criteria for the Establishment of Work Priorities and details in Guideline on the Application of the Criteria for the Establishment of Work Priorities (Criteria Applicable to Commodities).
- b. Requirements established by CCFO16 for Proposal of New Standard or Inclusion of New Oils/Fats.
- c. CCFO26 decision that submission of new work proposals should include both a discussion paper and project document.

CHECKLIST FOR NEW WORK PROPOSALS

	Items required	Note
CCFO26 de document	ecision on submission of new work proposal should	include both a discussion paper and project
Availability of	of a discussion paper	
Procedures	s for the Elaboration of Codex Standards and Related	I Texts: Project Document
Inf	ormation should be provided on:	
a.	the purpose and the scope of the standard	
b.	its relevance and timeliness	
C.	the main aspects to be covered	
d.	relevance to the Codex strategic objectives	
e.	information on the relation between the proposal and other existing codex documents as well as other ongoing work	
f.	Identification of any requirement for and availability of expert scientific advice	
g.	Identification of any need for technical input to the standard from external bodies so that this can be planned for	
h.	The proposed time-line for completion of the new work, including the start date, the proposed date for adoption at step 5, and the proposed date for adoption by the commission; the time frame for developing a standard should not normally exceed five years	
Criteria for	the Establishment of Work Priorities: Criteria Applica	able to Commodities
a.	Volume of production and consumption in individual cou between countries. Information should be provided on:	untries and volume and pattern of trade
	 Volume of production, expressed in monetary terms, tons, proportion of GDP, etc. 	

Items required	Note		
 Volume of consumption, expressed in monetary terms, tons, proportion of GDP, etc. 			
b. Volume and patterns of trade, including trends in tra terms, tons, proportion of GDP, etc.	de volume and patterns, expressed in monetary		
- between countries			
- in intra-regional trade, i.e., between or among countries of a region			
- In inter-regional trade, i.e., between or among regions			
 Credible sources or citations of information and/or references 			
 Diversification of national legislation and apparent resultant or potential impediments to international trade; 			
d. International or regional market potential. Information should be provided on:			
 International and/or regional market potential; and, where necessary; 			
 Potential of regional products to enter international trade including an analysis of current production trends as well as market potential in the foreseeable future. 			
d. Amenability of the commodity to standardization. Information sho	uld be provided on:		
 Which quality factors are essential for the identity of the product e.g. definition, composition, etc.; 			
 Characteristics of the commodity (e.g. differences in definition, composition, and other quality factors that may vary across countries and regions) that would have to be accommodated in the standard 			
e. Coverage of the main consumer protection and trade issues by existing or proposed general standards.			
 f. Number of commodities which would need separate standards indicating whether raw, semi-processed or processed, including information on the rationale for such needs 			
g. Information on work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies), including an analysis of areas of potential complementarities, gaps, duplication, or conflict with the above activities			
Requirements Established by CCCFO16 (for Proposal of New St	andard or Inclusion of New Oils/Fats)		
a. Level of international trade - volume, value and pattern of current or expected/potential trade.			
b. Scope - justification for inclusion within the scope of the Standard and evidence that the oil is to be presented in a state for human consumption.			
c. Taxonomic information - full details of all species of plant from which the oil is derived.			

Items required		Note
d.	Where appropriate, extent of difference - the extent to which the proposed new oil differs from those included in the current [Draft] Standard for Named Vegetable Oils, including for example such factors as variations in the chemical composition and/or the physical properties and/or the nutritional aspects or properties, of the oil.	
e.	In addition to the above, submissions should include any other relevant information, together with details of the proposed 'Essential Composition and Quality Factors'.	