

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FATS AND OILS

Twenty-ninth Session

Kuala Lumpur, Malaysia

9-13 February 2026

PROPOSED DRAFT STANDARD FOR MICROBIAL OMEGA-3 OILS

Comments in reply to CL 2025/80 – FO

Submitted by Brazil, Chile, China, Colombia, Ecuador, Egypt, Honduras, Indonesia, Iran (Islamic republic of), Japan, Jordan, Malaysia, Peru, Sudan, Thailand, the United States of America and the Global Organization for EPA and DHA Omega-3s (GOED)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/80-FO¹ 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 Annexes

2. The comments submitted through the OCS are contained in Annex I and presented in tabulated format.
3. Annex II contains additional comments of GOED that were referenced in Annex I.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>

ANNEX I

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
Respuesta: Chile no tiene observaciones	Chile
<p>Regarding to Note to Table 3: "which may be partly due to the difference in method of analysis and unit of quantitation". If the test methods of the fatty acid composition in Table 3 are the same as the methods listed in Clause 8 METHODS OF ANALYSIS AND SAMPLING, we suggest change the sentence to "which may be partly due to the difference in unit of quantitation". If the test methods of the fatty acid composition in Table 3 are different from the methods listed in Clause 8 METHODS OF ANALYSIS AND SAMPLING, we suggest supplement the test method for table 3 to make users clearer.</p> <p>Regarding the discrepancy in EPA for Schizochytrium oils between Table 1 and Table 3, there is a explanatory note added to Table 3 footnote to address the difference,"which may be partly due to the difference in method of analysis and unit of quantitation". If there are differences in analytical methods, which method is used for the determination in Table 3? It is recommended to add the analytical method so that Table 3 can be applied to authenticate the oil.</p>	China
No tenemos observaciones. Está listo para su adopción.	Colombia
Ecuador considera que el proyecto de norma constituye un avance relevante para la armonización internacional de criterios técnicos, de calidad e inocuidad aplicables a este tipo de aceites destinados al consumo humano. Asimismo, estima que la estructura del proyecto de norma es clara y coherente y que los requisitos propuestos permiten establecer un marco adecuado para contribuir a la seguridad, calidad y correcta información al consumidor; por lo que, Ecuador no mantiene observaciones al proyecto de norma	Ecuador
<p>Egypt strongly supports creating an international standard to cover EPA/ DHA oils from single-celled microalgae for various food uses, including food supplements. Industrially, the standard is important for harmonizing trade for vegan/vegetarian omega-3s. This will lead to protect consumer health, ensure fair free trade and assure product authenticity as well as quality for algal EPA/ DHA oils.</p> <p>However, for the purpose of developing the current draft , Egypt proposes the following:</p> <ol style="list-style-type: none"> 1. Adding levels of desmethylsterols from authentic samples, as a percentage of total sterols 2. Vegan microbial omega-3 oils must be free cholesterol or have not more than 0.55 mg/kg. 3. Microbial omega-3 oils must be free unacceptable or strange flavor as well as free from fish oil and marine/pet animals. 4. Same specifications (Relative density "x °C/water at 20 °C " , Iodine value, Iron, Refractive index, Copper) are needed to be added the current standard to cover the required specification of the standard. 5. Based on regulation (EC) No. 1829/2003 and regulation (EC) No. 1830/2003 the product does not have to be labeled as containing or being derived from a GMO. 	Egypt
<p>En el texto se utilizan indistintamente expresiones completas y abreviadas (por ejemplo, "AGPICL omega-3" y "EPA y DHA") sin definición reiterada.</p> <p>Comentario: asegurar que todas las abreviaturas estén claramente definidas en su primera mención y usadas de forma consistente.</p>	Honduras
Indonesia expresses its appreciation to the United States as Chair, and China as co-Chair, for their leadership in developing this document. In general, Indonesia supports the proposed draft Standard for microbial omega-3 oils.	Indonesia

COMMENT	MEMBER / OBSERVER
<p>Consistent with the Project Document, it is understood that this standard is intended to be inclusive and capable of being easily updated to incorporate other types of microbial omega-3 oils.</p> <p>Indonesia notes that the development of various microbial sources of omega-3 oils continues to advance, demonstrating the potential of microbial production platforms. As an example, microbial oil derived from <i>Mortierella alpina</i> has been studied.</p> <p>Therefore, Indonesia considers it would be beneficial for this standard to remain open to the inclusion of additional microbial omega-3 oil products within its scope in the future</p>	
<p>Iran supports the development of an international standard for microbial omega-3 oils to ensure fair trade practices and consumer protection.</p> <p>Iran appreciates Codex's efforts and recommend acceptance of the work with the following technical revisions to ensure scientifically robust and practically enforceable standards</p> <p>However, the following technical comments for improvement based on scientific principles and consistent analytical methods are submitted.</p>	Iran (Islamic republic of)
<p>We support the adoption of the proposed specification, provided that all technical comments submitted by the GOED Association, as outlined in the CRD card related to agenda item 6 of the meeting, are taken into account and the stipulated amendments are made.</p> <p>We would like to bring to your attention the Proposed Draft Standard for Microbial Omega-3 Oils that will be considered at the 29th Session of the Codex Committee on Fats and Oils (CCFO29) on 9-13 February in Kuala Lumpur, under agenda item 6.</p> <p>Please find in Annex II to this document, the Proposed Draft Standard for Microbial Omega-3 Oils as presented in Annex 1 of the Codex document CX/FO 26/29/6 and the comments that the Global Organization for EPA and DHA Omega-3s (GOED) has submitted supporting its adoption, while suggesting few improvements to the text.</p> <p>The Proposed Draft Standard provides a harmonised description, including named microbial omega-3 oils and concentrated microbial omega-3 oils, 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. While it focuses on most commonly traded microbial omega-3 oils, additional microbial oils can be included in the future based on trade volume, compositional and quality parameters, and associated methods.</p> <p>We trust that you appreciate our reasons for being in support to make progress in this area. In this sense, we would be very grateful if you could consider Jordan supporting the adoption of the Proposed Draft Standard for Microbial Omega-3 Oils for the upcoming CCFO29 session in Kuala Lumpur, and the agreement to forward it for its endorsement by the 49th Session of the Codex Alimentarius Commission.</p>	Jordan

COMMENT	MEMBER / OBSERVER
<p>Malaysia would like to thank the United States of America and China for respectively chairing and co-chairing the Electronic Working Group on the Proposed Draft Standard for Microbial Omega-3 Oils. Malaysia appreciates the opportunity to provide comments on the EWG Report CX/FO 26/29/6 as follows:</p> <ol style="list-style-type: none"> 1. Malaysia would like to seek clarification regarding the differences in EPA and DHA values presented in Table 1 and Table 3 for each oil. 2. Malaysia supports revising the scope of CXS 19-1981 to include that it does not apply to any oil covered by the Standard for microbial omega-3 oils. 3. Malaysia supports the proposal that a clarification is needed for CXS 19-1981 that it covers blended oils made from two or more different sources of oils covered in various CCFO standards. 4. Malaysia would also like to note that the description under item "2.1 Edible fats and oils" in CXS 19-1981 needs to be revised to include fats and oils of microbial origin. 	Malaysia
<p>We insured that oils from microbial source are aligned with principles of food hygiene</p>	Sudan
<p>The United States strongly supports the work on developing a Codex standard for microbial omega-3 oils.</p> <p>The United States chaired the EWG and supports forwarding it to CAC for adoption. The standard will not only ensure fair trade but also help in harmonizing international standards for microbial omega-3 oils. It will also help set a path forward for standardizing new emerging omega-3 oils derived from various microbial organisms, including microalgae, and encourage regulatory frameworks by trading countries to protect public health.</p>	USA
<p>GOED supports the adoption of the proposed draft Standard for Microbial Omega-3 Oils as presented in the EWG Report in Annex 1 of the Codex document CX/FO 26/29/6 that will be considered by CCFO29 under agenda item 6.</p> <p>The proposed draft Standard provides a harmonised description, including named microbial omega-3 oils and concentrated microbial omega-3 oils, 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.</p> <p>The proposed draft standard focuses on the most commonly traded microbial omega-3 oils. Additional microbial oils can be included in the future based on trade volume, compositional and quality parameters, and associated methods.</p> <p>GOED looks forward to the CCFO29 agreement to adopt the proposed draft Standard for Microbial Omega-3 Oils, and forward it for its endorsement by the 49th Session of the Codex Alimentarius Commission.</p>	GOED

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
1. SCOPE	
<p>El documento excluye explícitamente los aceites crudos, pero no define con claridad los criterios técnicos que determinan cuándo un aceite deja de considerarse “crudo”.</p> <p>Comentario: se sugiere clarificar o incorporar una definición armonizada del término “aceite crudo” para evitar interpretaciones regulatorias divergentes entre países.</p>	Honduras
2. DESCRIPTION	
<p>Microbial omega-3 oils mean oils intended for human consumption derived from microorganisms, including microalgae, that contain a substantial level of long-chain omega-3 polyunsaturated fatty acids (omega-3 LCPUFA), including at least 15% w/w fatty acids as sum of C20:5 (n-3) eicosapentaenoic acid (EPA) and C22:6 (n-3) docosahexaenoic acid (DHA).</p>	
<p>Considering that the amount of EPA and DHA varies in the oils included in the standard and that there is a specific table (Table 1) indicating the minimum and maximum amounts of these fatty acids for each of the oils, Brazil suggests to exclude the last sentence of the description or to amend the paragraph as follows:</p> <p>Microbial omega-3 oils mean oils intended for human consumption derived from microorganisms, including microalgae, that contain a substantial level of long-chain omega-3 polyunsaturated fatty acids (omega-3 LCPUFA)</p> <p>Or</p> <p>Microbial omega-3 oils mean oils intended for human consumption derived from microorganisms, including microalgae, that contain a substantial level of long-chain omega-3 polyunsaturated fatty acids (omega-3 LCPUFA)</p>	Brazil
<p>Criterios mínimos de contenido de EPA y DHA</p> <p>Se establece un mínimo de 15 % m/m de EPA + DHA para aceites no concentrados y 35 % m/m para aceites concentrados.</p> <p>Comentario: Se recomienda justificar técnicamente estos umbrales (por ejemplo, mediante referencias científicas o alineación con normas internacionales existentes) para fortalecer la base técnica del requisito.</p>	Honduras
<p>The definition of microbial omega-3 oils should explicitly include DPA alongside EPA and DHA with clear compositional criteria.</p> <p>Justification: DPA varies among microbial sources and influences oil characteristics</p>	Iran (Islamic republic of)
<p>Processes to obtain microbial omega-3 oils for human consumption may involve, but are not limited to, photoautotrophic or heterotrophic growth, separation of the biomass, extraction of crude oil from raw material and refining of that crude oil. Microbial omega-3 oils may also be subjected to additional processing steps, e.g. solvent extraction, enzymatic extraction, saponification, re-esterification, and trans-esterification. High EPA and/or DHA concentrations can be achieved through strain selection and optimization of growth conditions, and/or genetic modification. Microbial omega-3 oils may also be concentrated to adjust their LCPUFA content via physical, chemical or biological processes. All specifications in this standard apply only to unblended oils from single microbial source, however, commercial products may be a blend of microbial oils with other edible oils.</p>	
<p>Brazil suggests to exclude the last sentence of the paragraph since it is clear to which oils the standard applies to and this type of sentence is not used and is not necessary in other Codex standards.</p> <p>Microbial omega-3 oils can be composed of glycerides of fatty acids (primarily triglycerides, although some oils may have high levels of phospholipids and glycolipids) and low levels of non-saponifiable lipids, e.g., sterols, carotenoids.</p>	Brazil

COMMENT	MEMBER / OBSERVER
<p>Thailand notes that, in practice, industry may need to standardize the DHA content of microbial omega-3 oils, for example by blending with food-grade high-oleic sunflower oil. Thailand seeks clarification on whether the statement “Microbial omega-3 oils may also be concentrated to adjust their LCPUFA content via physical, chemical or biological processes” refers only to concentration or enrichment processes applied to the microbial oil itself, or also includes the adjustment or standardization of EPA and/or DHA content through blending with other food-grade edible oils.</p> <p>Furthermore, while the subsequent sentence states that “All specifications in this standard apply only to unblended oils from a single microbial source; however, commercial products may be a blend of microbial oils with other edible oils,” it remains unclear whether such blending practices for standardizing EPA and/or DHA content are intended to be outside the scope of this standard, or whether additional clarification is needed to ensure a common understanding among Members. If such blending processes are regarded as being within the scope of this standard, Thailand considers that further examination may be needed regarding the establishment of a maximum level for other edible oils permitted for use, as such blending may affect the overall fatty acid composition. In addition, consideration should be given to labelling provisions, including whether other edible oils used for this purpose should be declared in the list of ingredients, in order to ensure transparency and consumer protection.</p>	Thailand
<p>2.1 Named microbial omega-3 oils are derived from specific raw materials which are characteristic of the major microbial taxon from which the oil is extracted without altering the chemical form of the lipids. The microbial source of the omega-3 oil must have a history of safe use as food or as a production microorganism for omega-3 oils or be supported as a new source by sufficient scientific data on safety of the organism for its intended use.</p>	
<p>Named microbial omega-3 oils are derived from specific raw materials which are characteristic of the major microbial taxon from which the oil is extracted without altering the chemical form of the lipids. The microbial source of the omega-3 oil must have a history of safe use as food or as a production microorganism for omega-3 oils or be supported as a new source by sufficient scientific data on safety of the organism for its intended use for authorization by the country of retail sale.</p> <p>Canada proposes wording to clarify that safety evaluation remains under national authority and is not the role of Codex nor conducted within the Codex standard.</p>	Canada
<p>2.2 Concentrated microbial omega-3 oils are derived from microbial omega-3 oils described in Sections 2.1 which have been subjected to processes that may involve, but are not limited to hydrolysis, fractionation, winterization, molecular distillation, supercritical fluid extraction and/or re-esterification, and/or trans-esterification to increase the concentration of specific omega-3 fatty acids. Concentrated microbial omega-3 oils are primarily composed of fatty acid ethyl esters and/or re-esterified and trans-esterified triglycerides.</p>	
<p>Los aceites omega-3 de origen microbiano concentrados se obtienen de los aceites omega-3 de origen microbiano descritos en la Sección 2.1 que se han sometido a procesos como pueden ser, entre otros, la hidrólisis, el fraccionamiento, la frigelización, la destilación molecular, la extracción con fluidos supercríticos y/o reesterificación, o la transesterificación, para incrementar la concentración de determinados ácidos grasos omega-3. Los <i>aceites omega-3 de origen microbiano concentrados</i> se componen principalmente de etilésteres de ácidos grasos o triglicéridos reesterificados y transesterificados.</p> <p>Uso de microorganismos modificados genéticamente</p> <p>El texto menciona la posibilidad de obtener altas concentraciones de EPA o DHA mediante modificación genética, sin detallar implicaciones regulatorias.</p> <p>Comentario: se sugiere incluir una referencia explícita a la necesidad de cumplir con las regulaciones nacionales e internacionales sobre organismos genéticamente modificados, cuando aplique.</p>	Honduras

COMMENT	MEMBER / OBSERVER
3. ESSENTIAL COMPOSITION AND QUALITY FACTORS	
3.1 Gas-Liquid Chromatography (GLC) ranges of EPA and DHA	
<p>Canada supports the inclusion of minimum EPA+DHA content requirements for microbial omega-3 oils to ensure product integrity and authenticity. However, the draft standard does not currently explicitly state that these thresholds apply only to the oil as an ingredient and not to finished food products or supplements. Therefore, Canada recommends adding clarifying language in Section 2 (Description) or Section 3 (Essential Composition) such as:</p> <p>“The EPA and DHA thresholds specified in this standard apply to the microbial omega-3 oil ingredient as described herein and do not apply to finished food products or food supplements containing these oils.”</p> <p>This clarification update would:</p> <ul style="list-style-type: none"> Prevent misinterpretation that could lead to unnecessary compliance burdens for fortified foods Align with national regulatory approaches that set serving-size limits for EPA+DHA in finished foods national novel food and fortification policies, not Codex ingredient standards 	Canada
3.2 Quality parameters	
<p>Quality parameters factors</p> <p>Thailand proposes to revise the title of Section 3.2 to “Quality factors”, in order to better align with the terminology used in the title of section 3.</p>	Thailand
<p>Brazil suggests to include the note after item 3.2.1 and not before for clearance of the text. Moreover, Brazil would like to ask the Committee to consider if the wording of the note is correct since item 4 (Food Additives) of the proposed standard does not mention colours as authorized food additives for microbial oils, but only antioxidants, sequestrants, emulsifiers and flavourings. In this context, it is not clear if the referred colour means naturally coloured or added colour?</p>	Brazil
<p>Dice: Índice de ácido Debe decir: Índice de acidez</p>	Peru
<p>Note: The following parameters of this section do not apply to flavoured and intensely coloured microbial omega-3 oils where the added flavourings or the colour may interfere with the analytical determination: Peroxide Value, Anisidine Value, TOTOX, and Acid Value. 3.2.1 Microbial omega-3 oils shall be free from foreign and rancid odour and taste.</p> <ol style="list-style-type: none"> Thailand proposes to introduce an additional quality requirement under Section 3.2 to address sensory quality as new subsection 3.2.1, reading: “3.2.1 Microbial omega-3 oils shall be free from foreign and rancid odour and taste.” Thailand notes that the explanatory Note would be clearer if it were placed after subsection 3.2.2. 	Thailand
<p>Nota: Los siguientes parámetros de esta sección no se aplican a los aceites omega-3 de origen microbiano aromatizados o de color intenso en los que los aromatizantes añadidos o el color pueden interferir con la determinación analítica: índice de peróxido, índice de anisidina, el valor de oxidación total (TOTOX) e índice de ácido.</p> <p>Debe decir: índice de yodo (Perú consulta si para estos productos se requiere incorporar como Parámetros de calidad al índice de yodo, el cual es indicador de oxidación y deterioro de los aceites)</p>	Peru
<p>3.2.2 Microbial omega-3 oils (Section 2.1) shall comply with the quality parameters specified in Table 2.2.1) shall comply. Note: The following parameters of this section do not apply to flavoured and intensely coloured microbial omega-3 oils where the added flavourings or the colour may interfere with the quality parameters specified in Table 2 analytical determination: Peroxide Value, Anisidine Value, TOTOX, and Acid Value.</p>	Thailand

COMMENT	MEMBER / OBSERVER
<p>1. The current provision numbered 3.2.1 would be renumbered as 3.2.2.</p> <p>2. Thailand notes that the explanatory Note would be clearer if it were placed after subsection 3.2.2. This would improve readability and ensure that the Note is clearly associated with the relevant quality parameters.</p>	
4. FOOD ADDITIVES	
Canada supports the EWG recommendation to consult CCFA regarding the specified Notes in CXS 192-1995.	Canada
<p>Extend the list of acceptable antioxidants to include those used for polar lipid stabilization (EGCG, rosemary extract) with references to JECFA evaluations.</p> <p>Justification: The current Codex General Standard for Food Additives does not fully cover these.</p>	Iran (Islamic republic of)
<p>Antioxidants, sequestrants, and emulsifiers used in accordance with Tables 1 and 2 of the <i>General Standard for Food Additives (CXS 192-1995)</i>, in food category 02.1.3 (Lard, tallow, fish oil, and other animal fats) are acceptable for use in foods conforming to this Standard.</p> <p>Japan expresses its appreciation to the Chairs for preparing the draft standard.</p> <p>Japan recognizes that microbial omega-3 oils were considered to be treated similarly to fish oils in terms of use and fatty acid composition.</p> <p>At the same time, from the perspective of the food category descriptors set out in Annex A of the General Standard for Food Additives (CXS 192-1995), microbial omega-3 oils are not of animal origin. In this regard, it may be noted that, in addition to FC 02.1.3 (Lard, tallow, fish oil, and other animal fats), FC 02.1.2 (Vegetable oils and fats) may also be considered as a potentially relevant food category. It may also be noted that many of the food additives permitted under FC 02.1.2 and FC 02.1.3 are common to both categories.</p> <p>Note: For clarity, while FC 02.1.3 includes ascorbic acid (L-), which has antioxidant and sequestrant functions, and thiodipropionates, which have antioxidant functions, FC 02.1.2 does not include these additives.</p>	Japan
5. CONTAMINANTS	
<p>Brazil would like to ask for clarification if the contaminants for microbial oils would be the ones mentioned for edible fats oils in the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995):</p> <p>a) arsenic – 0,1 mg/kg;</p> <p>b) lead – 0,8 mg/kg.</p>	Brazil
<p>Clarify that only inorganic arsenic (As-in) should be considered for maximum level compliance, and provide a reference to speciation methods.</p> <p>Justification: Total arsenic includes organic forms, which have different toxicological relevance.</p>	Iran (Islamic republic of)
7. LABELLING	
<p>El etiquetado relacionado con la declaración del contenido de EPA y DHA y las declaraciones pertinentes <i>deberá</i> realizarse de conformidad con los requisitos normativos del país de venta al por menor.</p> <p>Etiquetado del contenido de EPA y DHA</p> <p>El documento remite al cumplimiento de los requisitos del país de venta al por menor para la declaración de EPA y DHA.</p> <p>Comentario: Se sugiere considerar la inclusión de criterios mínimos armonizados de declaración para facilitar el comercio internacional y evitar discrepancias regulatorias.</p>	Honduras
Labeling related to declaration of EPA and DHA content and related claims <i>should</i> be done in accordance with the regulatory requirements of the country of retail sale, <u>and</u>	Thailand

COMMENT	MEMBER / OBSERVER
<p><u>any claims should also be in accordance with the General Guidelines on Claims (CXG 1-1979).</u></p> <p>Thailand is of the view that labelling related claims should also be done in accordance with the Codex “General Guidelines on Claims” (CXG 1-1979). Therefore, Thailand proposes to include reference to CXG 1-1979 in section 7.3 to ensure consistency with existing Codex guidance on claims.</p> <p>Proposed Amened Text</p> <p>“7.3 Other labelling requirements</p> <p>Labelling related to the declaration of EPA and DHA content and related claims should be done in accordance with the regulatory requirements of the country of retail sale, and any claims should also be in accordance with the General Guidelines on Claims (CXG 1-1979).”</p>	
8. METHODS OF ANALYSIS AND SAMPLING	
<p>Canada believes that further work is needed on the methods table before referral to CCMAS. We note that several entries in Section 8 are incomplete or lack the required detail (missing principles and method type).</p>	Canada
<p>The standard should mandate the use of certified analytical methods (AOCS/ISO/Ph. Eur) for each parameter: peroxide, anisidine, TOTOX, acid value, and unsaponifiable matter.</p> <p>Justification: Ensures inter-laboratory consistency and regulatory enforcement.</p>	Iran (Islamic republic of)
<p>Dice: Índice de ácido</p> <p>Debe decir: Índice de acidez</p>	Peru
<p>Table 1: EPA and DHA composition of named microbial omega-3 oils as determined by gas liquid chromatography from authentic samples (expressed as percentage of total weight, g/100g oil) (see Section 3.1 of the Standard)</p>	
<p>Brazil would like to confirm if the minimum value of DHA for Schizochytrium EPA & DHA oil is correct because it appears to be very low compared to the other oils.</p>	Brazil
<p>Table 2: Quality parameters of named microbial omega-3 oils and their concentrate (see Section 3.3 of the Standard)</p>	
<p>Moisture</p> <p>Thailand notes that, unlike most Codex standards for fats and oils, which specify a limit for “moisture and volatile matter,” this draft standard includes a separate requirement for moisture content. Thailand invites clarification on the technical justification for establishing a standalone moisture requirement for microbial omega-3 oils, and on whether consideration has been given to using the combined parameter “moisture and volatile matter,” consistent with other Codex standards for fats and oils, taking into account potential cost implications for compliance and enforcement.</p>	Thailand
APPENDIX: OTHER QUALITY AND COMPOSITION FACTORS	
<p>Dice: Estos factores de calidad y composición ofrecen información complementaria a los factores esenciales de composición y calidad de la norma. Los productos que cumplan los factores esenciales de composición y calidad pero no cumplan estos factores complementarios se podrán considerar conformes a la norma.</p> <p>Debe decir: Estos rangos de ácidos grasos ofrecen información complementaria a los factores esenciales de composición y calidad de la norma, y se encuentran en el cuadro 3. Los productos que cumplan los factores esenciales de composición y calidad pero no cumplan estos factores complementarios se podrán considerar conformes a la norma.</p>	Peru
<p>These quality and composition factors <u>fatty acid ranges</u> are supplementary information to the essential composition and quality factors of the standard <u>standard found in Tables</u></p>	GOED

COMMENT	MEMBER / OBSERVER
<p>1 and 2. A product, which meets the essential quality and composition factors but does not meet these supplementary factors, may still conform to the standard.</p>	
<p>Table 3: Fatty acid composition of named microbial omega-3 oils as determined by gas liquid chromatography from authentic samples (expressed as percentages of total fatty acids, i.e., area %) (see Section 3.1 of the Standard)</p>	
<p>Canada proposes updated wording to the Footnote to this table to provide clarity around its purpose and intent.</p> <p>Note to Table 3. The purpose of Table 3 is only for use in confirming the authenticity of the respective oil types, based on the indicated ranges of diagnostic fatty acidsacids and are not intended as trade specifications. Microbial omega-3 oils are traded based on the accurately measured content of DHA and /or EPA, not for their fatty acid profiles. The ranges for EPA and DHA in Table 3 may vary from the requirements for minimum and maximum levels in g/100 g given in Table 1, which may be partly due to the difference in method of analysis and unit of quantitation.</p>	<p>Canada</p>
<p>GOED suggests the following changes in Table 3 for Schizochytrium under the column EPA & DHA Oil:</p> <ul style="list-style-type: none"> • C16:0 palmitic acid: change from 14.0 – 25.0 to 6.0 – 25.0 • C18:1 (n-9) oleic acid: change from ND – 0.6 to ND – 36.0 • C20:5 (n-3) eicosapentaenoic acid: change from 12.0 – 39.0 to 10.0 – 43.0 • C22:5 (n-6) docosapentaenoic acid: change from 0.5 – 3.5 to 0.5 – 13.0 • C22:6 (n-3) docosahexaenoic acid: change from 15.0 – 49.0 to 15.0 – 52.0 <p>GOED recommends changing the name of the following fatty acids in Table 3:</p> <ul style="list-style-type: none"> • From C17:1 heptadecenoic acid to C17:1 (isomer not specified) The suggested change is because it is not clear which isomers are present. • From C18:1 (n-7) vaccenic acid to C18:1 n-7 (isomer not specified) The suggested change is because it is not clear which isomers are present. 	<p>GOED</p>

ANNEX II

Additional comments of GOED

The Global Organization for EPA and DHA Omega-3s (GOED) wishes to thank the United States of America and China for chairing and co-chairing the Electronic Working Group (EWG) to prepare the proposed draft Standard for Microbial Omega-3 Oils for consideration by the 29th Session of the Codex Committee on Fats and Oils (CCFO29).

GOED supports the adoption of the proposed draft Standard for Microbial Omega-3 Oils as presented in the EWG Report in Annex 1 of the Codex document CX/FO 26/29/6 that will be considered by CCFO29 under agenda item 6.

The proposed draft Standard provides a harmonised description, including named microbial omega-3 oils and concentrated microbial omega-3 oils, 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.

The proposed draft standard focuses on the most commonly traded microbial omega-3 oils. Additional microbial oils can be included in the future based on trade volume, compositional and quality parameters, and associated methods.

GOED would like to propose the following amendments in the APPENDIX:

- GOED suggests a change to the first paragraph under OTHER QUALITY AND COMPOSITION FACTORS, replacing the words “quality and composition factors” by “fatty acid ranges,” as follows:

~~These quality and composition factors~~ fatty acid ranges are supplementary information to the essential composition and quality factors of the standard found in Tables 1 and 2. A product, which meets the essential quality and composition factors but does not meet these supplementary factors, may still conform to the standard.

- GOED suggests the following changes in Table 3 for Schizochytrium under the column EPA & DHA Oil:
 - C16:0 palmitic acid: change from 14.0 – 25.0 to 6.0 – 25.0
 - C18:1 (n-9) oleic acid: change from ND – 0.6 to ND – 36.0
 - C20:5 (n-3) eicosapentaenoic acid: change from 12.0 – 39.0 to 10.0 – 43.0
 - C22:5 (n-6) docosapentaenoic acid: change from 0.5 – 3.5 to 0.5 – 13.0
 - C22:6 (n-3) docosahexaenoic acid: change from 15.0 – 49.0 to 15.0 – 52.0
- GOED recommends changing the name of the following fatty acids in Table 3:
 - From C17:1 heptadecenoic acid to C17:1 (isomer not specified)
 - The suggested change is because it is not clear which isomers are present.
 - From C18:1 (n-7) vaccenic acid to C18:1 n-7 (isomer not specified)
 - The suggested change is because it is not clear which isomers are present.

In this regard, GOED looks forward to the CCFO29 agreement to adopt the proposed draft Standard for Microbial Omega-3 Oils, and forward it for its endorsement by the 49th Session of the Codex Alimentarius Commission.