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DEVELOPMENT OF A STRUCTURED APPROACH FOR DATA COLLECTION ON THE APPLICABILITY OF SECTION 3.2.3 FOOTNOTE (C) OF THE CODEX STANDARD FOR OLIVE OILS AND OLIVE POMACE OILS (CXS 33-1981)

(Prepared by the Syrian Arab Republic)

1. Purpose

Following the directive of the 47th Session of the Codex Alimentarius Commission (CAC47), the decisions of the 12th Session of the FAO/WHO Coordinating Committee for the Near East (CCNE12), and in light of the document prepared by the Codex Secretariat for CCFO29 (CX/FO 26/29/8 Add.2) related to the development of a framework for data collection to inform a potential revision of section 3.2.3, footnote (c), of the Standard for Olive Oils and Olive Pomace Oils (CXS 33-1981), the Syrian Arab Republic is submitting this discussion paper with the aim to:

- inform the Codex Committee on Fats and Oils (CCFO) of developments and actions undertaken by Syria and other members of CCNE since CAC47;
- provide technical considerations to support the development of a structured and inclusive framework for data collection on the applicability of Section 3.2.3, footnote (c), of the Codex Standard for Olive Oils and Olive Pomace Oils; and
- seek continued guidance from CCFO on the alignment of the approach proposed with the data collection efforts underway to underpin updates of the Codex Standard for Olive Oils and Olive Pomace Oils.

2. Background

At CAC47, the Commission adopted the revised Codex Standard for Olive Oils and Olive Pomace Oils (CXS 33-1981) at Step 5/8, while noting concerns expressed by several Members, including the Syrian Arab Republic, regarding the decision tree referenced in footnote (c) of Section 3.2.3 on 4 α -desmethylsterols.

The Syrian Arab Republic indicated that the current provisions of Section 3.2.3 and its associated footnote (c) may not fully reflect the natural compositional characteristics of authentic olive oils produced in certain regions. In particular, data generated from Syrian olive cultivars indicate naturally higher levels of Δ 7-stigmastenol and Δ ECN42 than those specified in the decision tree, which may result in the misclassification of genuine virgin olive oils as non-authentic.

CAC47 further agreed to:

- initiate work on data collection to assess the applicability of footnote (c) to all authentic olive oils;
- request the Codex Secretariat to develop a framework for data collection, including consultations and a Circular Letter; and
- invite FAO, resources permitting, to convene an expert working group to analyze the collected data.

3. Rationale for Data Collection

The Syrian Arab Republic reiterates its view that:

- authentic olive oils may exhibit natural compositional variability linked to cultivar, agro-climatic conditions, pedological factors, and harvesting maturity;

- such variability may influence parameters referenced in footnote (c), including $\Delta 7$ -stigmastenol and related decision-tree elements;
- without sufficiently representative datasets, there is a risk that authentic olive oils from certain regions could be misclassified under the current interpretation of footnote (c).

These concerns were previously presented at CCFO28, CAC47, and CCNE12 and were echoed by other Members, particularly in relation to inter-regional variability and climate-related factors.

4. Technical Considerations Based on National Experience

Based on data generated in Syria over multiple years and supported by collaborative studies with academic and research institutions¹, the following observations are shared for CCFO's consideration:

- Certain olive cultivars cultivated under Syrian agro-climatic conditions may naturally present $\Delta 7$ -stigmastenol values exceeding 0.5% while remaining authentic and unadulterated.
- In such cases, associated decision-tree parameters (including $\Delta ECN42$) may also fall outside the thresholds referenced in footnote (c).
- These observations underline the importance of evaluating the decision tree as a whole, rather than individual parameters in isolation, and of validating its applicability using multi-country and multi-season data.

These elements support the CAC47 conclusion that additional scientific data are required before CCFO can assess the universal applicability of footnote (c).

5. Considerations for a Data Collection Framework

In alignment with the Commission's recommendations, Syria supports a structured, stepwise approach to data collection (**Appendix I**) and wishes to highlight the following considerations for CCFO's reflection:

- **Representativeness:** Data should cover multiple cultivars, regions, and harvest seasons to capture natural variability.
- **Harmonized protocols:** Sampling, extraction, and analysis should follow internationally recognized methods (e.g. IOC methods) to ensure comparability.
- **Inclusion of existing data:** Where appropriate, historical datasets may complement newly generated data.
- **Regional engagement:** Coordination among interested Members, including through regional mechanisms such as the FAO/WHO Coordinating Committee for the Near East (CCNE), could facilitate efficient data generation and capacity building.

6. Outcome of CCNE12

At CCNE12, the Syrian Arab Republic presented a [discussion paper \(CRD4\)](#) outlining a structured approach for data collection to support the review of footnote (c) of the Codex Standard for Olive Oils and Olive Pomace Oils. The proposal received broad support from Members and Observers, who underscored the importance of evidence-based data, reflecting regional and varietal diversity in olive oil production.

CCNE12 agreed to invite Members to contribute relevant data in coordination with regional stakeholders, to inform Codex Committee on Fats and Oils (CCFO29) of this regional commitment, and to encourage FAO and Codex partners to provide technical support for data generation and analysis.

7. Linkages with Ongoing CCFO Work

The Syrian Arab Republic recognizes that CCFO is currently engaged in several olive oil-related data collection and review activities. In this context, CCFO may wish to consider:

- how the CAC47 request on footnote (c) could be coordinated or sequenced with existing workstreams;
- the implications for timelines, recognizing that robust data collection and analysis may require several years.
- how Members and Observers can be encouraged to contribute data in a coordinated and transparent manner.
- what mechanisms could best support analysis and interpretation of the collected data, including possible FAO expert involvement.

¹ CCNE12 [discussion paper](#), under (CRD4).

8. Concluding Remarks

The Syrian Arab Republic reaffirms its commitment to contributing data and to cooperating with other olive oil-producing countries and relevant international and regional organizations, including CCNE, the Arab Olive Office, FAO, the International Olive Council (IOC), and regional standardization bodies, with a view to ensuring that Codex provisions appropriately reflect the natural diversity of authentic olive oils across agroclimatic regions. This collaborative effort is intended to support the work of the Codex Alimentarius by promoting scientific rigor, inclusiveness, and fair practices in international trade.

In this context, the Syrian Arab Republic invites Codex Members and stakeholders to contribute to the data-generation efforts related to the applicability of Section 3.2.3 footnote (c) of the Codex Standard for Olive Oils and Olive Pomace Oils, and to coordinate such activities, as appropriate, within the framework of the Codex Committee on Fats and Oils (CCFO).

Structured Plan for Data Collection

Syria proposes a structured plan for data collection to support potential revisions to footnote (c) and its associated decision tree mechanism, as per the decision of CAC47. The plan involves generating new data through a representative sampling strategy that captures the characteristics of Syrian olive cultivars at various maturity stages, with the possibility of including samples from neighboring countries and CCNE producing countries to reflect broader regional variability:

- **Targeted cultivars and regions in Syria:** Sampling from key cultivars such as Sorani (Idlib), Zeiti (Aleppo), Qaisi (Aleppo), Khodairi (Latakia), Daaibli (Tartous), and Nabali (Homs/Hama).
- **Sampling method:** Olive fruits will be collected over two seasons (2025 and 2026) from marked trees in three ripening stages (early, mid, late), based on the Jaén index. Extraction will be done using centrifuge systems under laboratory conditions.
- **Analysis:** Samples will be classified for quality and stored appropriately (3 × 500 mL) before being sent to accredited laboratories for analysis. Parameters tested include fatty acid profile, sterol composition (including Δ^7 -stigmastenol), Δ ECN42, free acidity, peroxide value, and UV absorbance, using IOC-approved methods.
- **Stakeholder inclusion:** Large export companies can also be sampled, as commercial oils often represent blended varieties due to national production and marketing practices.

The same protocol can be extended to other CCNE member countries sharing similar pedological and climatic conditions (e.g. Lebanon, Palestine, Jordan, Iraq, Tunisia, Algeria and Türkiye), in a coordinated regional effort to build a representative and scientifically robust database on regional olive oil characteristics.