



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FATS AND OILS

Twenty-ninth Session

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COMMENTS OF PANAMA

Panama thanks the Government of Malaysia, the Codex Alimentarius Secretariat, and the FAO and WHO for organizing the 29th session of the Codex Committee on Fats and Oils. We acknowledge the sustained effort of the Committee and the Electronic Working Groups in preparing working documents and conducting technical discussions aimed at updating and harmonizing international standards applicable to fats and oils.

Panama reaffirms its commitment to strengthening the Codex Alimentarius as an international benchmark for protecting consumer health and facilitating fair trade, recognizing the importance of standards remaining based on scientific evidence, being technically feasible, and considering the productive and regulatory realities of developing countries.

Agenda items 2 and 2.1: Matters arising from the Codex Alimentarius Commission and its subsidiary bodies

Panama takes note of the information presented by the Codex Alimentarius Commission at its 47th and 48th sessions, as well as the guidance issued by the Executive Committee, and welcomes the approval of the revisions to key standards on fats and oils, including the Standard for Specified Vegetable Oils (CXS 210-1999), the Standard for Fish Oils (CXS 329-2017), the amendments to the labeling provisions for containers not intended for retail sale, and the update to the Code of Practice for the Storage and Transportation of Edible Oils and Fats in Bulk (CXC 36-1987). Panama values these developments as strengthening regulatory coherence, consumer protection, and facilitating international trade.

Panama supports the Commission's decisions regarding the extension of the deadline for completing the technical work on olive oils and olive pomace oils (CXS 33-1981), including that relating to diglycerides and pyropheophytin "a", as well as the initiation of data collection on the applicability of the decision diagram in footnote (c). Panama also supports the newly approved work on reducing trans fatty acid intake and developing a standard for omega-3 oils of microbial origin, and emphasizes the importance of implementing the Codex Strategic Plan 2026–2031, promoting efficient work management, inclusive participation, and effective coordination among committees.

Agenda item 3: Activities of international organizations relevant to the work of CCFO - Matters arising from FAO and WHO

Panama takes note of the information presented by FAO and WHO on activities and scientific advice relevant to the work of the CCFO, including JECFA's progress in assessing food contaminants, particularly arsenic species, as well as ongoing initiatives to eliminate industrially produced trans fatty acids and strengthen countries' regulatory and analytical capacities. Panama recognizes the relevance of this work for science-based risk management, the protection of public health, and international regulatory coherence, and emphasizes the importance of FAO and WHO's guidance and tools taking into account the production, trade, and institutional capacity realities of developing countries to facilitate their effective implementation and support informed participation by Members in Codex normative work on fats and oils.

Agenda item 4: *Standard for named vegetable oils (CXS 210-1999)* - Appendix, Section 5 Methods of Analysis and Sampling – fitness for purpose of the method for determination of gamma oryzanol in rice bran oil

General Comment: Panama takes note of the observations submitted by Members regarding the suitability

for purpose of the method for determining gamma oryzanol in rice bran oil included in CXS Standard 210-1999, and acknowledges the broad support for considering said method still fit for purpose, highlighting its simplicity, accessibility, and practical use, particularly in contexts with limited analytical capabilities. Panama considers it appropriate to move forward with the recommendation to the CCMAS for its inclusion in CXS Standard 234-1999, without prejudice to the continued evaluation and development of more selective and fully validated alternative methods, such as those based on HPLC, which could be incorporated in the future once they have undergone international collaborative validation, thus ensuring scientific rigor, regulatory harmonization, and applicability for all Members.

Agenda item 5: Proposed draft revisions to Codex standards on fats and oils to limit trans-fatty acid (TFA) intake

General Comment: Panama expresses its support for and agreement with the progress made in the procedures related to the revision of Codex standards concerning the elimination of industrially produced trans fatty acids (TFAs) and the prohibition of partially hydrogenated oils and fats (PHFs). The approach adopted by the Working Group on Energy (WGE), as well as the referral of specific technical aspects to the relevant committees, particularly the Committee on Food Safety and Nutrition (CFSAN) for the ratification of analytical methods and related provisions, contributes to strengthening the technical coherence, practical applicability, and international harmonization of standards, in accordance with Codex principles and the WHO REPLACE initiative. Panama also considers that the new provisions adequately address the evolution of production and control technologies and represent a significant step forward in modernizing the international regulatory framework.

Panama highlights that its food industry is currently implementing and progressively improving in accordance with the new regulations related to the proposals presented, favorably valuing the progress in regulatory modernization at the international level. The production sector has expressed its openness and willingness to adapt to these changes, recognizing that clear, harmonized regulations aligned with new technologies facilitate innovation, regulatory compliance, and the protection of public health. In this regard, the industry remains open to modifications of the regulations governing its activity, provided that these are adopted gradually, transparently, and predictably, allowing for effective and sustainable implementation.

Panama also emphasizes the importance of continued coordinated discussions and decisions on this matter within other relevant Codex committees, such as CCMAS, CCFL, and CCNFSDU, as well as other bodies related to the issue. In this context, Panama will closely monitor progress in the upcoming procedures and deliberations within the Codex regulatory update process to contribute constructively and ensure that future provisions maintain technical coherence, regulatory clarity, and feasibility for implementation by authorities and industry.

Agenda item 6: Proposed draft standard for microbial omega-3 oils

General Comment: Panama welcomes the draft standard for microbial omega-3 oils and acknowledges the work carried out by the electronic working group, as well as the balanced approach adopted to address safety, composition, quality, and trade aspects of these emerging products. Panama believes the proposal adequately responds to the evolution of fermentation- and biotechnology-based production technologies and appreciates that the standard seeks to ensure fair trade practices without restricting innovation, while maintaining consistency with other CCFO standards and existing national regulatory frameworks for novel foods.

Panama welcomes the progress of this draft standard within the Codex procedures and supports its continued review and development, including the submission of the analytical methods to the CCMAS and the labeling provisions to the CCFL, as well as the relevant consultations with the CCFA and CCCF. Panama will remain attentive to the progress of this standard in the subsequent stages of its review, within the framework of the Codex regulatory modernization process, recognizing the importance of having clear, harmonized, and technically sound provisions that facilitate its future implementation by the competent authorities and the food industry.

Agenda item 7: Review of the List of Acceptable Previous Cargoes (Appendix II to CXC 36-1987)

General Comment: Panama acknowledges and values the work carried out by the Malaysian-chaired Electronic Working Group for the review of the List of Acceptable Prior Cargoes (Appendix 2 of CXC 36-1987). The analysis presented and the recommendations made to the Committee reflect a sound technical approach, based on scientific criteria previously adopted by the Codex, which allows for an objective assessment of the

acceptability of substances used as prior cargoes in the transport and storage of bulk edible fats and oils. Panama believes that this process contributes to strengthening consumer health protection while maintaining the viability of international trade and operational clarity for stakeholders in the logistics chain.

Panama supports the Committee's continued progress in reviewing and updating this List based on relevant scientific information, recognized toxicological assessments, and the consistent application of established criteria. Panama welcomes proposals aimed at improving the systematicity and transparency of the process, such as the development of a standard template for submitting amendments, and considers these actions to be in response to evolving scientific knowledge, new analytical technologies, and current transportation practices. Panama will closely monitor the progress of this work in the subsequent stages, recognizing its importance for the ongoing modernization of the Codex regulatory framework in this area.

**Agenda item 8.2: Revision to the *Standard for olive oil and olive pomace oil* (CXS 33-1981):
Development of a framework for data collection on Section 3.2.3 footnote (c) (decision tree) – Follow up on the CAC47 directive**

General Comment: Panama takes note of document CX/FO 26/29/8 Add.2 and supports the guidance defined by the Codex Alimentarius Commission to advance the development of a structured framework for the collection of scientific data relating to the applicability of the decision diagram included in footnote c) of Section 3.2.3 of standard CXS 33-1981. Panama considers it pertinent that this exercise address the concerns expressed by various members, particularly regarding interregional variability associated with agroclimatic factors and the possible unintended impacts on the international trade of authentic olive oils, recognizing the need to base any regulatory adjustments on sound and representative scientific evidence.

Panama supports a phased, transparent, and technically sound approach to data collection and analysis, recognizing that this process may require several years and the coordinated participation of members, regional bodies, and, if possible, a group of experts convened by FAO. Panama expresses its willingness to closely monitor the progress of this work within the CCFO and emphasizes the importance of ensuring that future decisions related to footnote c) adequately reflect the diversity of production conditions, contribute to international regulatory modernization, and strike a balance between protecting product authenticity and facilitating international trade.

Agenda items 9.1, 9.2, 9.3, 9.4: Proposals for the new work and/or revision to existing Codex standards

General Comment: Panama supports the consideration of the proposals for new works submitted in response to circular letter CL 2024/39-FO, as it believes these initiatives reflect market evolution, the diversification of vegetable oils, and technological and scientific advances in their production and characterization. Panama also appreciates that the CCFO has a structured and transparent mechanism for evaluating new works and believes that the analysis of these proposals will contribute to strengthening and progressively updating the Codex regulatory framework, consistent with its mandate to protect consumers and facilitate fair international trade in food.