



45th Joint Coordination Meeting Arab and CCNE Codex Contact Points

PREPARATION FOR THE 29TH SESSION OF THE CODEX COMMITTEE ON FATS AND OILS (CCFO29)



Presented by (Egypt – Tunisia – Syria – Sudan)



Agenda Item 5

**Proposed draft revisions to
Codex standards on fats and oils
to reduce trans-fatty acid (TFA)
intake _ Step3**



REPLACE
TRANS FAT



Background : Agenda Item 5

- ❖ The Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) has been engaged since its **35th session (2013)** in work to support reducing trans-fatty acid (TFA) intake.
- ❖ The **WHO launched the REPLACE Initiative in 2018** to eliminate the use of industrially produced *trans*-fatty acids (iTFA) from the global food supply.

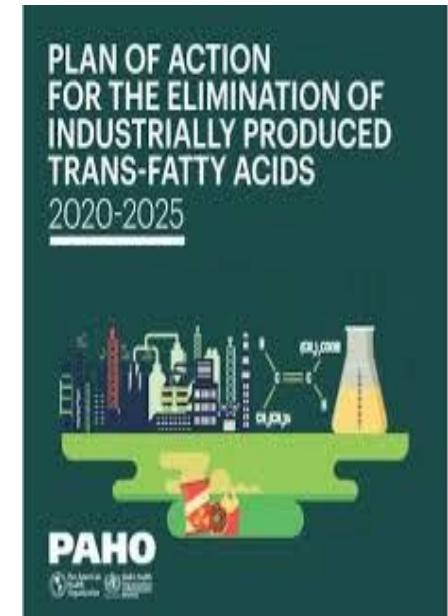
The WHO recommends that countries adopt one of two best-practice policy options for eliminating iTFA from the global food supply;



Limit % of
IP-TFA in total
fat in all food
products



Ban partially
hydrogenated oils
(PHO), the major
source of IP-TFA



- ❖ At **CCNFSDU41 (2019)**, Canada presented a discussion paper that identified risk management options for the reduction of TFA intake that fall within the mandate of Committees of the Codex Alimentarius Commission
- ❖ At **CCFO28 (2024)**, the Committee initiated new work to support the WHO REPLACE Initiative and established an Electronic Working Group (EWG), chaired by Canada and co-chaired by Saudi Arabia, to prepare proposed draft revisions for consideration at CCFO29. A total of **24 Members and 9 Observers** registered to participate in the EWG.
- ❖ **Arab countries participating in the EWG: Saudi Arabia, Egypt, Qatar, and the United Arab Emirates.**

Analysis : Scope and Methodology

Scope of the EWG Work

1. **Revision of selected Codex standards** on fats and oils to limit industrially produced trans-fatty acids and/or prohibit partially hydrogenated oils, namely:
 1. Standard for Edible Fats and Oils Not Covered by Individual Standards (CXS 19-1981)
 2. Standard for Fat Spreads and Blended Spreads (CXS 256-1999)
 3. Standard for Named Animal Fats (CXS 211-1999)
2. **Introduction and clarification of key definitions**, including partially hydrogenated oils, fully hydrogenated oils, and industrially produced trans-fatty acids, with alignment to the existing Codex definition for trans-fatty acids.
3. **Application of the proposed prohibitions and/or limits to fats and oils used as ingredients in other food products**, with enforcement focused on ingredient permissions rather than finished consumer products, in view of analytical challenges in differentiating industrial from ruminant trans-fatty acids.
4. **Development of regulatory approaches aligned with WHO guidance**, while maintaining flexibility for national and regional implementation.

Two rounds of consultation were conducted:

Round 1 : Working Document 1 (WD1)

- Identification of standards to be revised
- Initial proposals on:
 - Definitions (iTFA, PHO, fully hydrogenated oils)
 - Regulatory approaches (iTFA limit and/or PHO prohibition)
- Targeted questions to gather technical and policy feedback

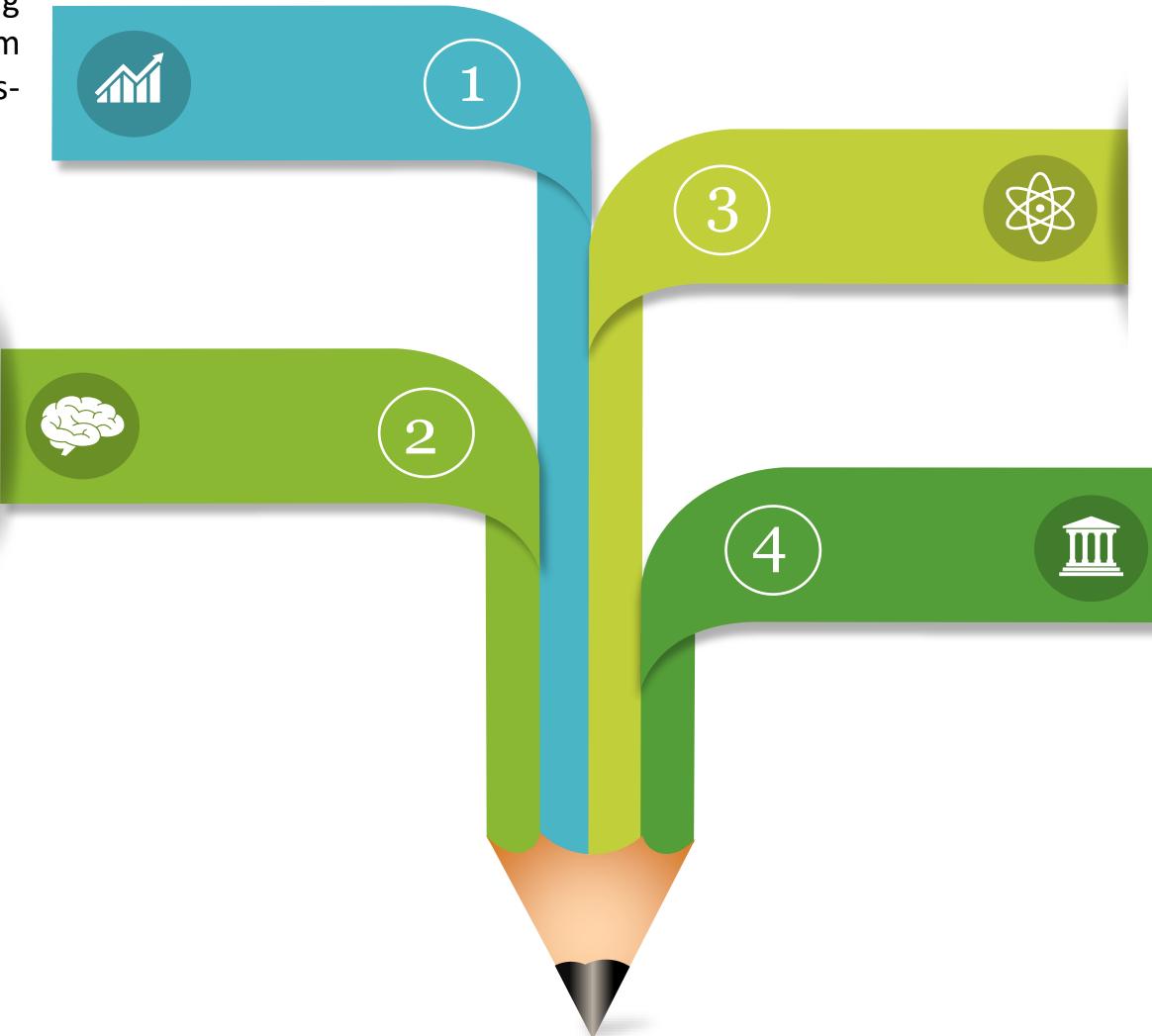
Round 2: Working Document 2 (WD2)

- Refined proposals based on WD1 comments
- Alignment with WHO REPLACE framework
- Additional focused questions and draft recommendations



Core Issues Identified in Revising Codex Standards on Trans-Fatty Acids

- ❖ Analytical limitations in distinguishing industrial trans-fatty acids from naturally occurring ruminant trans-fatty acids in finished food products.
- ❖ Ambiguity arising from the current Codex definition of trans-fatty acids in the Guidelines on Nutrition Labelling (CXG 2-1985), which does not distinguish between industrial and ruminant sources or clarify the status of conjugated linoleic acid (CLA).



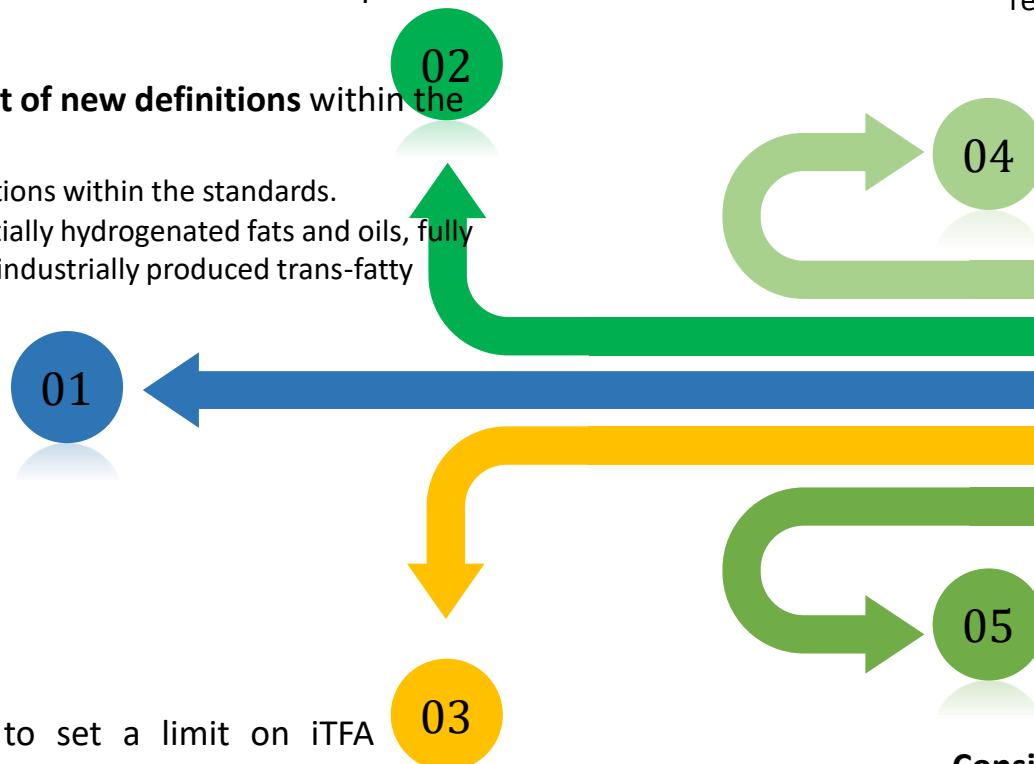
- ❖ Ensuring consistency and coherence between revised Codex fats and oils standards and existing Codex nutrition labelling texts.
- ❖ Potential need to refer related issues to other Codex Committees (CCNFSDU and CCFL) to ensure coherence between fats and oils standards, nutrition labelling provisions, and broader Codex terminology.

Proposed Revisions to Codex Standards on PHO and iTFA: Key Areas of Focus

Align definitions with existing the existing Codex definition of Trans Fatty Acids (TFA) and WHO best practices.

Development and placement of new definitions within the CCFO standards, including:

- Appropriate location of definitions within the standards.
- Drafting of definitions for partially hydrogenated fats and oils, fully hydrogenated fats and oils, and industrially produced trans-fatty acids.



Inclusion of a provision to set a limit on iTFA and/or prohibit PHO, including:

- Appropriate location for the provision within the standards.
- Drafting of the provision's wording to reflect WHO best practices while maintaining Codex's voluntary nature.

Clarification of existing terminology within Codex texts, including:

- Use of the terms "hydrogenated" and "hydrogenation" without qualification (i.e. partially or fully) within the CCFO standards.
- Potential clarification of these terms without qualification in other relevant Codex texts.



CODEX ALIMENTARIUS COMMISSION
Food and Agriculture Organization of the United Nations
World Health Organization
Agreement No. 3.1
JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON SPICES AND CULINARY HERBS
Eighth Session
Gastric, Asuncion, India
13-17 October 2020
DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES –
REQUIREMENTS FOR VANILLA (DRAFT)
(Prepared by the electronic working group¹ chaired by the United States of America and co-chaired by India, Madagascar and Mexico)
Codes members and Observers were invited to submit comments at Step 6/7 on Appendix 6 of the draft standard. These comments should be sent as indicated in C5.2020/10/10/11/12/13/14/15/16/17/18/19/20/21/22/23/24/25/26/27/28/29/30/31/32/33/34/35/36/37/38/39/40/41/42/43/44/45/46/47/48/49/50/51/52/53/54/55/56/57/58/59/60/61/62/63/64/65/66/67/68/69/70/71/72/73/74/75/76/77/78/79/80/81/82/83/84/85/86/87/88/89/90/91/92/93/94/95/96/97/98/99/100/101/102/103/104/105/106/107/108/109/110/111/112/113/114/115/116/117/118/119/120/121/122/123/124/125/126/127/128/129/130/131/132/133/134/135/136/137/138/139/140/141/142/143/144/145/146/147/148/149/150/151/152/153/154/155/156/157/158/159/160/161/162/163/164/165/166/167/168/169/170/171/172/173/174/175/176/177/178/179/180/181/182/183/184/185/186/187/188/189/190/191/192/193/194/195/196/197/198/199/199/200/201/202/203/204/205/206/207/208/209/2010/2011/2012/2013/2014/2015/2016/2017/2018/2019/2020/2021/2022/2023/2024/2025/2026/2027/2028/2029/2030/2031/2032/2033/2034/2035/2036/2037/2038/2039/2040/2041/2042/2043/2044/2045/2046/2047/2048/2049/2050/2051/2052/2053/2054/2055/2056/2057/2058/2059/2060/2061/2062/2063/2064/2065/2066/2067/2068/2069/2070/2071/2072/2073/2074/2075/2076/2077/2078/2079/2080/2081/2082/2083/2084/2085/2086/2087/2088/2089/2090/2091/2092/2093/2094/2095/2096/2097/2098/2099/20100/20101/20102/20103/20104/20105/20106/20107/20108/20109/20110/20111/20112/20113/20114/20115/20116/20117/20118/20119/20120/20121/20122/20123/20124/20125/20126/20127/20128/20129/20130/20131/20132/20133/20134/20135/20136/20137/20138/20139/20140/20141/20142/20143/20144/20145/20146/20147/20148/20149/20150/20151/20152/20153/20154/20155/20156/20157/20158/20159/20160/20161/20162/20163/20164/20165/20166/20167/20168/20169/20170/20171/20172/20173/20174/20175/20176/20177/20178/20179/20180/20181/20182/20183/20184/20185/20186/20187/20188/20189/20190/20191/20192/20193/20194/20195/20196/20197/20198/20199/20100/20101/20102/20103/20104/20105/20106/20107/20108/20109/20110/20111/20112/20113/20114/20115/20116/20117/20118/20119/20120/20121/20122/20123/20124/20125/20126/20127/20128/20129/20130/20131/20132/20133/20134/20135/20136/20137/20138/20139/20140/20141/20142/20143/20144/20145/20146/20147/20148/20149/20150/20151/20152/20153/20154/20155/20156/20157/20158/20159/20160/20161/20162/20163/20164/20165/20166/20167/20168/20169/20170/20171/20172/20173/20174/20175/20176/20177/20178/20179/20180/20181/20182/20183/20184/20185/20186/20187/20188/20189/20190/20191/20192/20193/20194/20195/20196/20197/20198/20199/20100/20101/20102/20103/20104/20105/20106/20107/20108/20109/20110/20111/20112/20113/20114/20115/20116/20117/20118/20119/20120/20121/20122/20123/20124/20125/20126/20127/20128/20129/20130/20131/20132/20133/20134/20135/20136/20137/20138/20139/20140/20141/20142/20143/20144/20145/20146/20147/20148/20149/20150/20151/20152/20153/20154/20155/20156/20157/20158/20159/20160/20161/20162/20163/20164/20165/20166/20167/20168/20169/20170/20171/20172/20173/20174/20175/20176/20177/20178/20179/20180/20181/20182/20183/20184/20185/20186/20187/20188/20189/20190/20191/20192/20193/20194/20195/20196/20197/20198/20199/20100/20101/20102/20103/20104/20105/20106/20107/20108/20109/20110/20111/20112/20113/20114/20115/20116/20117/20118/20119/20120/20121/20122/20123/20124/20125/20126/20127/20128/20129/20130/20131/20132/20133/20134/20135/20136/20137/20138/20139/20140/20141/20142/20143/20144/20145/20146/20147/20148/20149/20150/20151/20152/20153/20154/20155/20156/20157/20158/20159/20160/20161/20162/20163/20164/20165/20166/20167/20168/20169/20170/20171/20172/20173/20174/20175/20176/20177/20178/20179/20180/20181/20182/20183/20184/20185/20186/20187/20188/20189/20190/20191/20192/20193/20194/20195/20196/20197/20198/20199/20100/20101/20102/20103/20104/20105/20106/20107/20108/20109/20110/20111/20112/20113/20114/20115/20116/20117/20118/20119/20120/20121/20122/20123/20124/20125/20126/20127/20128/20129/20130/20131/20132/20133/20134/20135/20136/20137/20138/20139/20140/20141/20142/20143/20144/20145/20146/20147/20148/20149/20150/20151/20152/20153/20154/20155/20156/20157/20158/20159/20160/20161/20162/20163/20164/20165/20166/20167/20168/20169/20170/20171/20172/20173/20174/20175/20176/20177/20178/20179/20180/20181/20182/20183/20184/20185/20186/20187/20188/20189/20190/20191/20192/20193/20194/20195/20196/20197/20198/20199/20100/20101/20102/20103/20104/20105/20106/20107/20108/20109/20110/20111/20112/20113/20114/20115/20116/20117/20118/20119/20120/20121/20122/20123/20124/20125/20126/20127/20128/20129/20130/20131/20132/20133/20134/20135/20136/20137/20138/20139/20140/20141/20142/20143/20144/20145/20146/20147/20148/20149/20150/20151/20152/20153/20154/20155/20156/20157/20158/20159/20160/20161/20162/20163/20164/20165/20166/20167/20168/20169/20170/20171/20172/20173/20174/20175/20176/20177/20178/20179/20180/20181/20182/20183/20184/20185/20186/20187/20188/20189/20190/20191/20192/20193/20194/20195/20196/20197/20198/20199/20100/20101/20102/20103/20104/20105/20106/20107/20108/20109/20110/20111/20112/20113/20114/20115/20116/20117/20118/20119/20120/20121/20122/20123/20124/20125/20126/20127/20128/20129/20130/20131/20132/20133/20134/20135/20136/201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Summary of EWG Recommendations



- 01** Maintain the current Codex definition of TFA without exemption for ruminant sources, but clarify through a footnote the limitations in analytical differentiation
- 02** Support flexibility in implementation by allowing Enable countries to choose to choose either a PHO ban or iTFA limit, based on national priorities.
- 03** Encourage extending these revisions to other Codex food standards where fats and oils are used as ingredients (e.g., bakery products, infant formula).
- 04** Request the Codex Committee on Methods of Analysis and Sampling (CCMAS) to review and validate the enforcement footnote and any analytical methods mentioned.
- 05** Refer related issues to other Codex Committees (e.g., CCNFSDU, CCFL) to ensure alignment with nutrition labeling and dietary uses.
- 06** Clarify ambiguous terms like “hydrogenated” or “hydrogenation”, which are often used without specifying whether partial or full.
- 07** Propose adding a footnote explaining how compliance is verified using a mix of analytical and non-analytical tools (e.g., declarations, documentation).

Two proposed footnote options (concise and detailed) have been suggested

Key Comments & Additional Proposals Of the Arab CCFO WG

Comments & Additional Proposals	CXS 19-1981	CXS 256-1999	CXS 211-1999
<ul style="list-style-type: none"> Clarify that the term “hydrogenation” in the scope also explicitly covers fully hydrogenated oils and fats. 	✓	✓	✓
<ul style="list-style-type: none"> Support introducing a mandatory provision and rephrase as: <ul style="list-style-type: none"> a limit of industrially produced trans-fatty acids (iTFA) to not more than 2 g per 100 g of total fat in the product in addition to natural TFA ; and/or Prohibit the production for use of partially hydrogenated fats and oils (PHO) in the product iii . a limit of shall be iodine value ≤ 4 	✓	✓	✓
<ul style="list-style-type: none"> Delete Footnote i 	✓	✓	✓
<ul style="list-style-type: none"> Support including an enforcement footnote based on Option 1 (concise). 	✓	✓	✓
<ul style="list-style-type: none"> Agree with reference to CXS 234-1999 for methods of analysis and sampling to verify compliance, and request CCMAS to identify methods to distinguish ruminant from industrial iTFA. 	✓		
<ul style="list-style-type: none"> Delete Footnote ii (the definition of “food” is already provided in the Codex Procedural Manual). 		✓	✓
<ul style="list-style-type: none"> For the enforcement footnote iii, support using Option 1 (concise), 	✓	✓	✓
<ul style="list-style-type: none"> Propose adding a labelling provision: The claim “free from iTFA” if the free fatty acid content does not exceed 0.5%. 	✓	✓	✓

Arab CCFO WG position on EWG Recommendations (R1 to R7)

EWG Recommendation

Arab CCFO WG position

<p>R1: Introduce new definitions for PHO, FHO, iTFA in the three CCFO standards.</p>	Request to include the Standard for Named Vegetable Oils (CXS 210-1999) : Egypt notes that CXS 210-1999 is not among the targeted standards and, given its importance for mandatory TFA labelling in several countries (e.g. Canada, KSA), supports extending the clear, science-based iTFA definition and related provisions to CXS 210-1999 to enhance transparency, consumer awareness and public health protection.
<p>R2+R3+R4: Invite the Committee to review and comment on the proposed definitions for inclusion in the three CCFO standards.</p>	Agree
<p>R5: Invite the Committee to refer revision of the Codex TFA definition in CXG 2-1985 to CCNFSDU, for better distinguish between industrially produced and ruminant trans-fatty acids for nutrition labelling purposes.</p>	Agree
<p>R6: Place the provision to prohibit PHO and/or limit iTFA in the “Essential Composition and Quality Factors” section of each standard, creating this section where it is missing, to align the standards’ structure with the Codex Procedural Manual.</p>	Limit and Pan No or
<p>R7: Invite the Committee to review the draft wording of the iTFA/PHO provision, including: its clarity, enforceability and alignment with WHO best practices; the use of “should” vs “shall” to balance flexibility and strong public health action; and the footnote referring to the Codex definition of “food” to clarify the scope of application.</p>	Agree

Arab CCFO WG position on EWG Recommendations (R8 to R12)

R8: Invite the Committee to review the draft clarifying footnote on “hydrogenation” and comment on its clarity and alignment with WHO best practices.

Agree

R9: Invite the Committee to refer possible revisions to **Section 4.2.3.1 of CXS 1-1985 (GSLPF)** to **CCFL**, to improve clarity and support enforcement of the CCFO's work once completed.

Egypt proposes establishing a **harmonized Codex definition for the claim “free of trans fats”**, whereby a food may be considered “free of trans fats” if laboratory analysis shows **TFA > 0.0% and ≤ 0.5% of total fat**.

R10: Include a “**Methods of Analysis**” section to CXS 19-1981 (in the main body, while retaining the Appendix) to support enforcement of the iTFA limit and/or PHO prohibition

Agree, and request the development/identification of test methods that can distinguish between **ruminant** and **industrially produced** trans-fatty acids.

R11: Invite the Committee to **include a compliance footnote** on how verification will be done, **review the two proposed wordings** (concise and detailed), and then **refer the agreed text to CCMAS for technical review**.

Suggest to add instead of this option

R12: Invite the Committee to **request CCMAS** to review and endorse appropriate methods and provisions for verifying the iTFA limit and PHO prohibition (including AOAC TFA methods and iodine value as a screening tool), and, where possible, **identify methods to distinguish ruminant from industrially produced TFA**.

Agree



Egypt proposes establishing a dedicated Codex working group to develop a “**Code of Practice for Frying with Vegetable Oils** to help reduce the formation of trans-fatty acids and other harmful compounds and improve public health and food safety

