ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR TWENTY- NINTH SESSION OF THE CODEX COMMITTEE ON FATS AND OILS (CCFO29)

Prepared to Support the Participation of Codex Communities of Practice Supported by GFoRSS

9–13 February 2026 • Kuala Lumpur, Malaysia

Disclaimer and Disclosure of Interest

It is important to note that the proposed analysis and associated conclusions and recommendations stem from the work of regional expert working groups. The analysis and associated recommendations or positions are presented as mere suggestions and should not be considered as a direction or final recommendation to the competent authority empowered to develop and endorse Codex positions.

Disclosure of Interest: *Some experts involved in the development of this analysis contribute to various food safety and nutrition regulatory capacity building initiatives funded by other Governments, aid agencies, industry and international organizations.*

OBJECTIVES

This document offers an analysis of agenda items to support participation in the **29th session of the Codex Committee on Fats and Oils (CCFO29)**, taking place in **Kuala Lumpur, Malaysia**, from **9 to 13 February 2026.**

The document is intended for possible use by the Codex communities of practice promoted by the Global Food Regulatory Science Society (GFoRSS), as part of their contribution to enhancing awareness and supporting effective participation in international standard setting meetings (Codex meetings), by representatives from member countries and observers.

This document will offer an analysis of select key agenda items to support the development of positions at the national and regional level. This analysis is indicative in nature and does not represent an official position of the organization, its membership or its management.

The analysis provided in this document offers a factual review of key agenda items of CCFA55, pertaining to:

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A. Agenda Item 5: Proposed Draft Revisions To Codex Standards On Fats And Oils To Limit Trans Fatty Acid Intake

Document Number**: CX/FO26/29/5**

Status in Codex Process: **At Step 3**

Background

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 World Health Organization (WHO) launched the REPLACE Initiative in **2018** to eliminate the use of industrially produced trans-fatty acids (iTFA) from the global food supply. This initiative provides governments with technical support and policy guidance[1].

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

A. A mandatory national limit of 2g iTFA per 100g of total fat in all fats, oils and foods; or
B. A mandatory national ban2 on the production and use of PHO in all foods.

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.

Analysis

SCOPE OF 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:
   - Standard for Edible Fats and Oils Not Covered by Individual Standards (CXS 19-1981)
   - Standard for Fat Spreads and Blended Spreads (CXS 256-1999)
   - 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.

METHODOLOGY

Two rounds of consultation were conducted:

[1] WHO, 2018. Replace Trans Fat. An Action Package to Eliminate Industrially-Produced Trans-Fatty Acids. https://www.who.int/docs/default-source/documents/replace-transfats/replace-action-package.pdf

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

Key Areas of Focus

The EWG focused its work on the following elements:

- Development and placement of new definitions for PHO, fully hydrogenated oils (FHO), and iTFA, and identification of the appropriate location for these definitions within the standards.
- Alignment with the existing Codex definition of TFA in the **Guidelines on Nutrition Labelling (CXG 2-1985)**, while ensuring clarity for the application of iTFA-specific provisions.
- Drafting of new regulatory provisions to prohibit PHO and/or limit iTFA, including suitable placement in the standards and phrasing that reflects WHO policy options while preserving Codex flexibility.
- Clarification of terminology related to hydrogenation, especially the unqualified use of "hydrogenated" and "hydrogenation" in Codex texts, including the CCFO standards and **the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).**
- Consideration of appropriate methods of analysis and sampling to verify compliance with the proposed provisions, with possible referral to **CCMAS**

Key Achievements

The EWG has substantially advanced its work on revising three Codex standards to support global efforts to eliminate the use of iTFA from the global food supply, in alignment with WHO's REPLACE initiative.

Key achievements include:

A. Consensus on structural changes and placement of new definitions and provisions within the standards.

B. Development of definitions for partially hydrogenated fats and oils (PHO), fully hydrogenated fats and oils (FHO), and industrially produced *trans*-fatty acids (iTFA).

C. Drafting of a provision for mandatory measures to limit iTFA to not more than 2 g per 100 g of total fat in all foods, and/or prohibit the production and use of PHO in all foods.

D. Inclusion of clarifying footnotes on terminology and compliance verification approaches.

E. Identification of analytical methods and compliance verification approaches for referral to CCMAS.

Overview of Key Issues and Proposals

Several core issues have been identified that may impact the effective update and alignment of Codex guidance on trans-fatty acids:

- One of the primary challenges in revising Codex standards for trans-fatty acids (TFAs) is the **analytical difficulty in distinguishing** industrially produced TFAs from **naturally occurring ruminant TFAs** in finished food products. This technical limitation complicates enforcement and accurate labeling, which are critical to ensuring consumer protection and compliance with regulatory limits.
- There is notable **ambiguity in the current Codex definition** of TFAs as outlined in the Guidelines on Nutrition Labelling (CXG 2-1985). Specifically, the current wording does not clearly differentiate between industrial and ruminant sources of TFAs. Additionally, the **status of conjugated linoleic acid (CLA)** remains undefined, contributing to confusion in implementation and potential inconsistencies in labeling requirements across countries.
- A key issue in revising TFA standards is the need to maintain **coherence between updated fats and oils standards and existing Codex nutrition labeling provisions**. Without alignment, there is a risk of sending conflicting messages to stakeholders and undermining the credibility and utility of Codex texts across member states.
- To address overlapping areas, there is a **potential need to refer certain matters to other Codex Committees**, particularly CCNFSDU (Committee on Nutrition and Foods for Special Dietary Uses) and CCFL (Committee on Food Labelling).

Summary of EWG Recommendations

The Electronic Working Group (EWG) structured its drafting process around key technical and policy priorities. It submitted **12 targeted recommendations** to CCFO29 for consideration, addressing analytical, definitional, implementation, and labelling challenges.

Below is a summary of the core recommendations presented.

- Introduce new definitions for:Partially hydrogenated fats and oils (PHO); Fully hydrogenated fats and oils; Industrially produced trans fatty acids (iTFA)
- Introduce a new provision to prohibit PHO and/or limit iTFA to 2 g per 100 g of fat.
- Use the term “hydrogenated” only with qualification (e.g., “partially” or “fully”) throughout Codex texts.
- Do not exempt ruminant TFA from the definition, but include a footnote to explain that analytical methods may not differentiate sources.
- Support flexibility in implementation by allowing countries to choose between prohibition or limitation strategies.
- Identify appropriate methods of analysis and sampling for verifying compliance.
- Adding a footnote clarifying that compliance with the trans-fatty acids (TFA) standard can be demonstrated using both analytical methods and non-analytical tools, such as declarations or supporting documentation. **Two versions of the footnote have been suggested (concise and one detailed)** to accommodate different national contexts and implementation needs:

A. Footnote Option1 (Concise):

"For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls shall be used instead of, or in addition to, the relevant methods of analysis and sampling contained in the Recommended methods of analysis and sampling (CXS 234-1999), as compliance cannot rely solely on analytical methods."

B. Footnote Option 2 (Detailed):

"*For checking the compliance with this provision:*

i. For the iTFA limit, a hybrid approach shall be used, combining analytical methods contained in the Recommended Methods of Analysis and Sampling (CXS 234-1999) for total trans-fatty acid quantification, with non-analytical measures such as ingredient declarations, PHO-free certifications, and supply chain records to estimate ruminant TFA content and infer iTFA quantity.

ii. For the PHO prohibition, compliance shall be verified through documentation, as there are no validated analytical methods to directly detect PHO in foods. Iodine value (IV) may be used as a screening tool at the ingredient level to help differentiate fully hydrogenated oils from PHO, noting that IV ≥ 4 is typically associated with PHO."

- Consider broader application of these provisions to other Codex standards beyond fats and oils (e.g., processed foods using oils as ingredients).
- Refer related matters to Codex committees like CCNFSDU and CCFL to ensure coherence with existing dietary and labelling standards.

Key Comments and Other Considerations

- Egypt notes that **CXS 210-1999 (Named Vegetable Oils)** is not among the targeted standards and suggests that the new iTFA-related definitions and measures should also be extended to edible oils, given their role in mandatory TFA labelling in several countries (e.g. Canada, KSA).
- Egypt **supports clear, science-based regulatory measures** aligned with WHO (limits or bans on iTFA plus appropriate labelling) and proposes a **harmonized Codex criterion for the claim "free of trans fats"**: TFA content **> 0.0% and ≤ 0.5% of total fat**, to cover unavoidable traces while ensuring enforceable, consumer-protective labelling and facilitating trade.
- Egypt proposes establishing a **Codex working group to develop a "Code of Practice for Frying with Vegetable Oils"**, providing practical, science-based guidance on frying conditions and oil handling to minimise TFA formation and other harmful compounds, thereby supporting food safety and quality.

Conclusion and Recommendations

The proposed draft incorporates key revisions developed by the EWG, including new definitions for PHO, FHO and iTFA, provisions to prohibit PHO and/or limit iTFA in fats and oils (including when used as ingredients), and clearer use of hydrogenation-related terminology. It also introduces a compliance footnote based on a hybrid verification approach (analytical and non-analytical tools) and identifies issues to be further considered by CCNFSDU, CCFL and CCMAS to ensure coherence and technical soundness across Codex texts.

Building on the draft EWG proposal on iTFA and PHO, the Arab CCFO WG may recommend the following actions, with further details on the positions and comments provided in Annex 1 and Annex 2:

- Support the progression and adoption of the proposed draft provisions on industrially produced trans-fatty acids (iTFA) and partially hydrogenated oils (PHO), in line with WHO best-practice policies.

- Support introducing a mandatory provision in 3.2 and rephrase as:
  - a limit of **industrially produced TFA ≤ 2 g per 100 g of total fat in the product**, in addition to natural TFA; and/or
  - **prohibit the production for use of PHO in the product** iii;
  - For fully hydrogenated fats/oils, **iodine value (IV) ≤ 4**.
- **Recommend Clarifying** that the term *"hydrogenation"* in the scope explicitly covers **both partial and full hydrogenation**, including fully hydrogenated oils and fats
- **Suggest deleting Footnote iii** ("Food"), as this definition is already provided in the **Codex Procedural Manual**.
- Promote the use of both analytical and non-analytical tools (e.g. ingredient declarations, supply-chain documentation, certificates, and screening tests such as iodine value) to verify compliance, recognizing differing national capacities and analytical limitations.
- Endorse **Footnote Option 1(concise)** as the preferred compliance verification model, as it clearly allows the use of non-analytical measures, instead of or in addition to analytical methods, without introducing excessive operational detail into the standards.
- Support the EWG recommendation to refer intersecting issues (e.g. nutrition labelling, the status of CLA, and the relationship with the existing Codex TFA definition) to CCNFSDU and CCFL, as appropriate, in order to ensure consistency and coherence across Codex texts.
- Support that, in a subsequent step, **CCFO** consider extending coherent TFA-related provisions (definitions, limits and labelling elements) to the **Standard for Named Vegetable Oils (CXS 210-1999)**, given its importance for mandatory TFA labelling in several countries (e.g. edible oils).
- Support **the** establishment of Codex work on a **"Code of Frying Practice for Vegetable Oils"**, to provide science-based guidance on frying conditions and oil handling, with the objective of minimizing TFA formation and supporting food safety and quality.
- Support inviting **CCMAS** to review the proposed enforcement-related footnote and the referenced methods, to **endorse suitable methods for TFA quantification and iodine value screening** and, where feasible, to explore analytical approaches to distinguish **industrial vs. ruminant TFA**.

Annex 1

		AMENDMENT	COMMENTS
PROPOSED DRAFT REVISIONS TO THE STANDARD FOR EDIBLE FATS AND OILS NOT COVERED BY INDIVIDUAL STANDARDS (CXS 19-1981) (STEP 3)	scope	This standard (formerly CAC/RS 19-1969) applies to oils and fats and mixtures thereof in a state for human consumption. It includes oils and fats that have been subjected to processes of modification (such as trans- esterification **or hydrogenation**) or fractionation.	**Fully hydrogenation**
	Footnote i	The term "hydrogenation" may refer to either full or partial hydrogenation, as applicable under national and/or regional legislation or regulations. This reflects the global public health objective of eliminating industrially produced trans-fatty acids (iTFA) from the food supply, by setting a mandatory limit of not more than 2 g iTFA per 100 g of total fat in all foods, and/or by prohibiting the	delete
	2.Product definitions	**Fully hydrogenated** fats and oils (FHO) are produced through a chemical process in which hydrogen is added to all the double bonds in unsaturated fats and oils, using a catalyst. This process converts all unsaturated bonds into saturated single bonds, resulting in a fully saturated fat structure. Because the hydrogenation is complete, the formation of industrially produced trans-fatty acids (iTFA) is minimized. The resulting fats and oils are typically solid or semi-solid at room temperature due to their higher melting point and exhibit enhanced stability and resistance to oxidation. **Partially hydrogenated fats and oils (PHO**) are produced through a chemical process that adds hydrogen to some of the double bonds in unsaturated fats and oils, using a catalyst. This converts those double bonds into single bonds, making the fat more saturated. During this process, some of the remaining double bonds undergo geometric isomerization, changing from the natural cis configuration to the trans configuration. The process can be controlled to create fats and oils with a wide range of physical properties, such as texture and melting point, regardless of the original oil composition. It also leads to the formation of trans-fatty acids, which may vary depending on the degree of hydrogenation. **Industrially produced trans-fatty acids (iTFA)** are trans-fatty acids obtained through industrial processes, primarily formed during the partial hydrogenation of unsaturated fats and oils, though smaller amounts may also be produced during other industrial processes, such as oil refining and deodorization. iTFA are defined solely by their method of production and cannot be chemically distinguished from other TFA.	agree
	3. ESSENTIAL COMPOSITION AND QUALITY FACTORS	Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: a) b) 8. Set a limit of industrially produced trans-fatty acids (iTFA) to not more than 2 g per 100 g of total fat in all foods ii; and/or Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods [iii].	
	footnote [iii]	ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION: OPTION 1 (CONCISE): For checking the compliance with this provision, non-analytical measures such as ingredient	

		AMENDMENT	COMMENTS
		declarations and process controls shall be used instead of, or in addition to, the relevant methods of analysis and sampling contained in the Recommended methods of analysis and sampling (CXS 234-1999), as compliance cannot rely solely on analytical methods. OPTION 2 (DETAILED): For checking the compliance with this provision: a) b) For the iTFA limit, a hybrid approach shall be used, combining analytical methods contained in the Recommended methods of analysis and sampling (CXS 234-1999) for total trans-fatty acid quantification, with non-analytical measures such as ingredient declarations, PHO-free certifications, and supply chain records to estimate ruminant TFA content and infer iTFA quantity. For the PHO prohibition, compliance shall be verified through documentation, as there are no validated analytical methods to directly detect PHO in foods. Iodine value (IV) may be used as a screening tool at the ingredient level to help differentiate fully hydrogenated oils from PHO, noting that IV ≥ 4 is typically associated with PHO.	
	8.METHODS OF ANALYSIS AND SAMPLING	For checking the compliance with this standard, the methods of analysis and sampling contained in the Recommended methods of analysis and sampling (CXS 234-1999)12 relevant to the provisions in this standard, shall be used.	
PROPOSED DRAFT REVISIONS TO THE STANDARD FOR FAT SPREADS AND BLENDED SPREADS (CXS 256-1999) (STEP 3)	2.1.2	Edible fats and oils “Edible fats and oils” means foodstuffs composed of glycerides of fatty acids. They are of vegetable or animal (including milk) or marine origin. They may contain small amounts of other lipids such as Phosphatides, of unsaponifiable constituents and of free fatty acids naturally present in fat or oil. Fats of animal origin must, if originating from slaughtered animals, be obtained from animals in good health at the time of slaughter and fit for human consumption as determined by a competent authority recognized in national legislation. Fats and oils that have been subjected to processes of physical or chemical modification including fractionation, inter-esterification or **hydrogenation**[i] are included.	
	3.2	Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: a) Set a limit of industrially produced trans-fatty acids (iTFA) to not more than 2 g per 100 g of total fat in all foods[iii] ; and/or b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foodsiv .	
	FOOTNOTES	iii “Food” as defined in the Codex Alimentarius Commission Procedural Manual. iv ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION: OPTION 1 (CONCISE): For checking the compliance with this provision, non-analytical measures such as ingredient declarations and process controls shall be used instead of, or in addition to, the relevant methods of analysis and sampling contained in the Recommended methods of analysis and sampling (CXS 234-1999), as compliance cannot rely solely on analytical methods.	

		AMENDMENT	COMMENTS
		OPTION 2 (DETAILED): For checking the compliance with this provision: a) For the iTFA limit, a hybrid approach shall be used, combining analytical methods contained in the Recommended methods of analysis and sampling (CXS 234-1999) for total trans-fatty acid quantification, with non-analytical measures such as ingredient declarations, PHO-free certifications, and supply chain records to estimate ruminant TFA content and infer iTFA quantity. b) For the PHO prohibition, compliance shall be verified through documentation, as there are no validated analytical methods to directly detect PHO in foods. Iodine value (IV) may be used as a screening tool at the ingredient level to help differentiate fully hydrogenated oils from PHO, noting that IV ≥ 4 is typically associated with PHO.	
PROPOSED DRAFT REVISIONS TO THE STANDARD FOR NAMED ANIMAL FATS (CXS 211-1999) (STEP 3)	Product definitions	2.1.1 Lard Pure rendered lard is the fat rendered from fresh, clean, sound fatty tissues from swine (Sus scrofa) in good health, at the time of slaughter, and fit for human consumption. The tissues do not include bones, detached skin, head skin, ears, tails, organs, windpipes, large blood vessels, scrap fat, skimmings, settlings, pressings, and the like, and are reasonably free from muscle tissues and blood. Lard subject to processing may contain refined lard, lard stearin and hydrogenatedi lard, or be subject to processes of modification provided that it is clearly labelled. 2.1.2 Rendered pork fat subject to processing may also contain refined lard, refined rendered pork fat, hydrogenatedi lard, hydrogenatedi rendered pork fat, lard stearin and rendered pork fat stearin provided that it is clearly labelled.	
	Footnote i	The term “hydrogenated” may refer to either full or partial hydrogenation, as applicable under national and/or regional legislation or regulations. This reflects the global public health objective of eliminating industrially produced trans-fatty acids (iTFA) from the food supply, by setting a mandatory limit of not more than 2 g iTFA per 100 g of total fat in all foods, and/or by prohibiting the production and use of partially hydrogenated fats and oils in all foods.	Delete
	3.2	Competent national and/or regional authorities should implement mandatory legislative or regulatory measures to: a) Set a limit of industrially produced trans-fatty acids (iTFA) to not more than 2 g per 100 g of total fat in all foodsii; and/or b) Prohibit the production for food use, and the use of partially hydrogenated fats and oils (PHO) in all foods[iii].	
	Footnotes	ii “Food” as defined in the Codex Alimentarius Commission Procedural Manual. iii ENFORCEMENT FOOTNOTE OPTIONS FOR COMMITTEE CONSIDERATION:	

Annex 2

No.	Recommendations	Opinion
1	The EWG recommends that the Committee consider the following approach for the integration of the proposed definitions across the CCFO standards: a) Include the proposed definitions within "Section 2: Descriptions" for all three standards. b) Introduce two subsections within Section 2 ("2.1 Product definitions" and "2.2 Other definitions") separating the descriptions of products covered by the standard from additional definitions needed to clarify the meaning of the standard. This proposal is reflected in draft revisions to the three targeted standards in Annex II.	**Standard for Named Vegetable Oils (CXS 210 1999) to be included to the three targeted standards in Annex II.** **They did not include (CXS 210-1999):** **With reference to point 27, Egypt takes note of the latest draft definition of "industrially produced trans-fatty acids (iTFA)," which states:** **"Industrially produced trans-fatty acids (iTFA) are trans-fatty acids primarily formed during the industrial process of partial hydrogenation of unsaturated fats and oils. Smaller amounts may also be produced during other processes, such as oil refining and deodorization."** **Furthermore, Egypt would like to highlight that several countries, including Canada and the Kingdom of Saudi Arabia, have addressed trans-fatty acids through mandatory labeling requirements, whereby the trans-fatty acid content is declared on edible oil packaging *(STANDARD FOR NAMED VEGETABLE OILS CXS 210-1999).* Such measures contribute to increased transparency, consumer awareness, and public health protection.** **In light of the above, Egypt supports the adoption of clear, science-based definitions and regulatory measures aligned with WHO recommendations, including limits or bans on iTFA, as well as appropriate labeling provisions, to effectively reduce iTFA intake and protect public health.**
2	The Committee is invited to review and provide input on the proposed **definition of "partially hydrogenated fats and oils"**, including clarity, technical accuracy, and suitability for inclusion in the targeted CCFO standards. This proposal is reflected in the draft revisions to the three targeted standards in Annex II.	Agree
3	The Committee is invited to review and provide input on the proposed **definition of "fully hydrogenated fats and oils"**, including clarity, technical accuracy, and suitability for inclusion in the targeted CCFO standards. This proposal is reflected in the draft revisions to the three targeted standards in Annex II.	Agree
4	The Committee is invited to review and provide input on the proposed **definition of "industrially produced trans-fatty acids"**, including its clarity, technical accuracy, and suitability for inclusion in the targeted CCFO standards. This proposal is reflected in the draft revisions to the three targeted standards in Annex II.	Agree

No.	Recommendations	Opinion
5	The Committee is invited to review and provide input on the proposal to refer the matter of revising the Codex definition of trans-fatty acids in CXG 2-1985 to CCNFSDU, following the CCFO's completion of this work. **(Nutrition labelling)**	Agree distinguish between industrial and ruminant sources
6	The eWG recommends that the Committee consider placement of the provision to **prohibit PHO and/or restrict iTFA** in the "Essential Composition and Quality Factors" section of each standard, as outlined above, and add such a section when missing from the standard with a view to align the structure of such a standard with the Codex Procedural Manual. This proposal is reflected in the draft revisions to the three targeted standards in Annex II.	Limit **and** Pan No or
7	The Committee is invited to review and provide input on the current draft wording of the proposed provision and comment on: a) Its clarity, enforceability, and alignment with WHO best practices. b) The appropriateness of using "should" rather than "shall" to maintain Codex flexibility while promoting strong public health action. c) The proposed footnote referring to the Codex **definition of food**, for **clarification of the scope** of application for both options within the provision. This proposal is reflected in the draft revisions to the three targeted standards in Annex II.	Agree
8	The Committee is invited to review and provide input on the draft wording of the **clarifying footnote for hydrogenation** in the above paragraph and provide comments on the clarity and alignment with WHO best practices. This proposal is reflected in the draft revisions to the three targeted standards in Annex II.	Agree
9	The EWG recommends that the Committee consider the proposal to refer the matter of potential revisions to Section 4.2.3.1 of the General Standard for the **Labelling of Prepackaged Foods** (CXS 1 1985) to CCFL to improve clarity and support enforcement of the work of the CCFO, following its completion.	2- Methods of Analysis and Sampling: With reference to point 48, Egypt proposes the introduction of a clear and harmonized definition for the claim "free of trans fats," based on analytical results, in order to ensure consistency, enforceability, and consumer protection. For regulatory and labeling purposes, a food product may be considered **"free of trans fats"** when the result of laboratory analysis shows a trans-fatty acid content greater than 0.0% and not exceeding 0.5% of total fat. This tolerance accounts for unavoidable trace amounts of trans-fatty acids that may occur due to natural presence or minor formation during permitted processing practices, while remaining consistent with public health objectives. The establishment of this definition would support accurate labeling, facilitate international trade, and align with existing practices adopted by several Codex members.

No.	Recommendations	Opinion
10	It is recommended that the Committee consider the structural revision to CXS 19-1981 to include a **"Methods of Analysis"** section in the main body while retaining this section in the Appendix, ensuring consistency across Codex standards and to support effective enforcement of the iTFA limit and/or PHO prohibition. This proposal is reflected in the draft revisions to CXS 19-1981 in Annex II.	Agree
11	It is recommended that the Committee: a) Consider the inclusion of a footnote in the provision to clarify the compliance verification approach. b) Review the two proposed footnote options presented above (one concise and one detailed) for wording of the footnote. Both footnote options for this proposal are reflected in the draft revisions to the three targeted standards in Annex II. (If the footnote is supported and its wording is agreed upon by the Committee, it will be referred to CCMAS for technical review and confirmation of appropriateness, given that it references analytical methods and screening tools, as noted in Recommendation 12.)	
12	It is recommended that the Committee request CCMAS to review and endorse methods and related provisions necessary for verification of compliance, as follows: a) iTFA limit: Review AOAC 996.06 for endorsement for TFA quantification in composite foods, to enable its use in the hybrid approach for iTFA compliance verification, in line with CCMAS principle of endorsing one primary method per provision. b) PHO prohibition: Review the iodine value methods listed in for endorsement as an indicative screening tool (Type I) at the ingredient level for fats and oils, with explicit limitations (i.e., not for enforcement), to support documentation-based verification. c) Compliance verification footnote: Review the footnote on compliance verification (if agreed by the Committee under Recommendation 11) for technical accuracy and appropriateness, as part of CCMAS endorsement work.	Agree

No.	Recommendations	Opinion
13	New	Egypt proposes the establishment of a dedicated working group to develop a "**Code of Frying Practice for vegetables oil"**, in view of its potential impact on the formation of trans-fatty acids. Scientific evidence indicates that certain frying practices, particularly prolonged or repeated heating of oils at high temperatures, may lead to the formation of trans-fatty acids, in addition to other undesirable degradation products. In the absence of harmonized international guidance, variations in frying practices may pose risks to public health and create inconsistencies in food quality and safety. Egypt considers that the development of a Codex Code of Practice for Frying would provide practical, science-based guidance on the selection of appropriate frying oils, control of frying temperatures and duration, oil turnover, and proper handling and disposal of used oils. Such guidance would contribute to minimizing the formation of trans-fatty acids and other harmful compounds, while supporting food safety and quality objectives. Accordingly, Egypt supports the establishment of a Codex working group to elaborate this Code of Practice, taking into account existing scientific evidence, WHO recommendations, and the experiences of Codex Members.

B. Agenda item 8.1: Revision to the Standard for Olive oil and Olive pomace oil (CXS 33 - 1981): Collection and submission of scientific data

Document Number: **CX/FO 26/29/8 add.1**

Background

At the 28th session of CCFO (2025), Italy as chair, with Australia, Canada, Saudi Arabia and the USA as co-chairs, operate the EWG and is tasked both gathering data and critically evaluating its suitability for further analysis and standard-setting. **Arab countries participating in the EWG:** Egypt, Iraq, Jordan, Morocco, Saudi Arabia, Syria, Tunisia.

The EWG on scientific data and information on olive oil was created to collect global scientific data and information on olive oil, focusing on free fatty acids, fatty acid ethyl esters (FFAE), acidity, peroxides, and sensory defects taking into account the influence of time, temperature, light exposure exposure, and oxygen exposure on the values of 1,2-diglycerides (DAGs) and Pyrophenophytin (PPPs).

The overall purpose to gather and assess the collected data and information for suitability and make recommendations to CCFO on the need and process for further analysis.

Data collection mandate

The group must collect worldwide data on free fatty acids, fatty acid ethyl esters (FAEE), acidity, peroxide values and sensory defects, while considering how time, temperature, light, UV radiation and oxygen affect 1,2-diglycerides (DAGs) and pyropheophytin “a” (PPPs).

Assessment and advice function

The EWG is charged with assessing the suitability of the collected data set and making recommendations to CCFO on whether further analysis is needed and how such analysis should be organised.

Reporting requirement

It must submit a consolidated report on the collected data and its initial assessment before CCFO29, so that the Committee can review and integrate the findings in its next session.

Key Participation and Positions of Arab countries

Arab countries demonstrated strong active participation in CCFO28 discussions on EWG proposals related to olive oil standards, particularly revisions to CXS 33-1981 (Olive Oils and Olive Pomace Oils).

Countries Involved: Seven Arab nations attended CCFO28 (Egypt, Iraq, Jordan, Morocco, Saudi Arabia, Syria, Tunisia).

Support for EWG Olive Oil Revisions:

- Expressed clear support for proposed revisions to Sections 3 (definitions), 8 (labelling), and Appendix (methods) in CXS 33-1981.
- Emphasized enhancements to quality and authenticity parameters, including labelling to prevent misrepresentation.
- Advocated preserving traditional production methods alongside modern standards.
- Specific interventions : Morocco (CRD30), Syria (CRD20), UAE (CRD13).

Saudi Arabia served as co-chair in multiple EWGs:

- EWG on trans-fatty acids (TFA) reduction (with Canada).
- Olive oil data collection EWG (with Italy, Australia, USA, Canada).

At the 29th session of CCFO (2026), delegates are invited to consider the EWG's progress and future work direction.

CCFO29 is invited to:

- Decide if the data collected so far by the EWG is sufficient to justify more detailed analysis.
- Choose whether this further analysis should be done by the EWG or via an FAO expert consultation, as previously envisaged by CCFO28.
- Consider re-establishing the EWG with terms of reference allowing it to continue gathering additional data and to analyse both existing and newly submitted datasets.

Analysis

PARTICIPATION AND METHODOLOGY

The Electronic Working Group (EWG) successfully completed its **data collection phase** by developing a standardized template (Appendix I of EWG report), issuing global call **CL 2024/36-FO** (May 2024), and receiving **8 Codex Members + 1 Observer** submissions (Annex I of EWG report).

- **Key achievements**: Full protocol compliance from major producers (Australia, USA, Spain, Turkey); IOC literature compilation; sufficient data volume for preliminary analysis of free fatty acids, FAEE, acidity, peroxides, sensory defects, and storage effects on DAGs/PPPs.
- **Data gaps**: Partial FAEE/sensory submissions requiring targeted follow-up.
- **Status**: EWG ready for **CCFO29** to decide on data adequacy, analysis path (EWG continuation vs FAO consultation), and potential EWG re-establishment for deeper analysis.

Work Element	Actions Taken & Details	Key Outputs & Results	Status & Observations
1. Methodology Development	EWG designed comprehensive data collection template (Appendix I) specifying: - Parameters: free fatty acids, FAEE, acidity, peroxide values, sensory defects - Analytical methods/protocols - Storage factors (time, temperature, light/UV, oxygen) affecting DAGs/PPPs Template uploaded to Codex Online Commenting System (OCS)	Standardized template enabling structured, comparable global data collection	Complete - Ready for analysis
2. Global Data Call	Circular Letter CL 2024/36-FO issued May 2024 with deadline 30 Sep 2025 Requested worldwide olive oil data from all Codex Members and Observers	Official global call launched successfully	Complete

Work Element	Actions Taken & Details	Key Outputs & Results	Status & Observations
3. Participation Achieved	8 Codex Members + 1 Observer submitted data: - Full protocol compliance: Australia, USA, Spain, Turkey - Partial submissions: Some missing FAEE/sensory analysis - IOC contribution: Scientific literature compilation	Full datasets compiled in Annex I (Zipper folder/Dropbox link) Appendix II: Participant list	Complete
4. Data Quality Assessment	**Strengths:** Major producers (Australia, USA, Spain, Turkey) followed protocol fully → high comparability **Gaps:** Some Members couldn't provide complete FAEE/sensory data **Complementary:** IOC literature strengthens dataset context	Appendix I of the EWG's report: summary table showing coverage by parameter Data gaps identified for follow-up	Mostly complete - Some gaps need attention
5. Next Phase Preparation	**EWG ready to:** a) Assess dataset suitability for statistical analysis b) Recommend analysis path (continue EWG vs FAO expert consultation) c) Prepare CCFO29 report	Work products prepared for CCFO29 consideration: - Data adequacy assessment - Analysis recommendations - EWG re-establishment proposal	Ready for CCFO29 decisions

SUMMARY OF DISCUSSION AND COMMENTARY OF EWG MEMBERS

The EWG collected substantial olive oil data on PPP/1,2-DAG evolution alongside CXS 33-1981 quality parameters, enabling shelf-life analysis. Despite mixed views on data collection extensions, consensus supports a ***dual-track approach***: continue gathering additional data while immediately initiating analysis of existing datasets ***within the EWG framework*** (preferred over FAO consultation for transparency and flexibility).

CCFO29 must decide on data adequacy, analysis path, and EWG continuation to balance progress with evidence strengthening.

Aspect	Situation	EWG Recommendation	Rationale
Data Collected	Substantial PPP/1,2-DAG evolution data + CXS 33-1981 parameters (FAEE, acidity, peroxides, sensory)	Sufficient for preliminary shelf-life analysis	Enables parameter interaction assessment
Extension Requests	Mixed views: - some want more time assuming that more time could help expand the dataset and improve its representativeness across different production regions and categories of olive oil, - others say data adequate	Dual-track: Continue collection + start analysis	Progress without delay; incorporates new data
Analysis Preference	Members prefer EWG instead of doing the analysis by FAO expert consultation as agreed by CCFO28	Continue analysis within EWG framework	Transparency, Member exchange, flexible integration

Aspect	Situation	EWG Recommendation	Rationale
CCFO29 Decisions	Data adequacy, analysis path, EWG continuation	Discuss dual-track feasibility	Balance completeness vs progress momentum

RECOMMENDED PROTOCOL FOR PPP & 1,2-DAG EVOLUTION IN EXTRA VIRGIN OLIVE OIL

The EWG established a comprehensive 24-month monitoring protocol measuring PPP, 1,2-DAGs and CXS 33-1981 quality parameters (acidity, peroxides, UV absorbance, FAEE, sensory) at 9 time points (with 3 moths intervals T=0 to T=24 months), with detailed metadata on production, storage conditions and laboratory accreditation.

Parameter	Standard Method	Frequency
1,2-DAGs	COI/T.20/Doc. No 32 or ISO 29822	T=0,3,6,9,12,15,18,21,24 months
PPP (Pyropheophytin a)	ISO 29841	Same 9 time points
Acidity (FFA)	ISO 660 / COI/T.20/Doc. No 34	Same 9 time points
Peroxide value	COI/T.20/Doc. No 35 / ISO 3960	Same 9 time points
UV absorbance (K232, K270, ΔK)	COI/T.20/Doc. No 19 / ISO 3656	Same 9 time points
FAEE	COI/T.20/Doc. No 28	Same 9 time points
Sensory (panel test)	COI/T.20/Doc. No 15	Same 9 time points

Required Metadata:

- Production: Variety, maturity index*, harvest/milling dates**, post-extraction treatment
- Packaging: Blending/bottling date, container type/size, headspace volume, inert gas purging
- Storage : Temperature profile, light exposure (dark/ambient/artificial), duration
- Laboratory: Accreditation status, contact details

Notes:

- *Not for blended oils; **Blend dates for all component oils
- Data certified by nationally authorized laboratories
- Protocol applies from extraction (single varietal) or bottling (blends)

Recommendation

- ❖ Acknowledge the sufficiency of the collected data for preliminary analysis.
- ❖ Decide on the most appropriate analytical mechanism (EWG-led versus FAO expert consultation).
- ❖ Re-establish the EWG with a clear mandate to continue data collection and undertake structured analysis of both existing and new datasets
- ❖ Optimizing Arab delegation participation in CCFO29 will further strengthen impact, with clear distribution of roles among countries based on experience and expertise

C. Agenda item 9.3: Proposal for New Work – Revision to the Standard for Named Vegetable Oils (CXS 210-1999): Adjustment of Stearic Acid Content for High Oleic Sunflower Oil

Document Number: CX/FO 26/29/9 Add.3

Status in Codex Process: New work

Background

At the 28th Session of the Codex Committee on Fats and Oils (CCFO28, 2025), the Committee agreed to issue a Circular Letter inviting Codex Members and Observers to submit proposals for new work, including amendments to existing Codex standards, for consideration at CCFO29.

In response, the Islamic Republic of Iran submitted a proposal to revise the compositional specification for stearic acid (C18:0) in high oleic sunflower oil under the Standard for Named Vegetable Oils (CXS 210-1999). The proposal is based on multi-year analytical data from imported high oleic sunflower oil consignments, which consistently show stearic acid levels below the current Codex minimum, while complying with all other Codex requirements.

Overall purpose

The purpose of the proposed new work is to adjust the lower limit of stearic acid content for high oleic sunflower oil in CXS 210-1999 to better reflect **current agricultural production realities**, while maintaining oil quality, functionality, consumer protection, and fair practices in international trade.

Technical issue under consideration

CXS 210-1999 currently specifies the following stearic acid ranges for sunflower oils:

- High oleic sunflower oil: **2.9–6.2%**
- Mid-oleic sunflower oil: **2.1–5.0%**
- Sunflower oil: **2.7–6.5%**

Analytical results from imported high oleic sunflower oil consignments indicate that a substantial proportion of authentic high oleic sunflower oils exhibit stearic acid levels below 2.9%, typically within the range of 2.1–2.9%, while fully complying with all other Codex compositional and quality parameters.

The data further demonstrates a well-documented inverse relationship between oleic acid and stearic acid content, characteristic of modern high-oleic sunflower cultivars. This variability results in otherwise compliant oils falling outside the current Codex specification.

The proposal therefore suggests amending the stearic acid range for high oleic sunflower oil from 2.9–6.2% to 2.1–6.2%.

Participation and relevance for Codex Members

The proposal is particularly relevant for countries that rely on imports of high oleic sunflower oil for frying oil formulations, especially in the context of public health policies promoting reduced saturated fat intake in line with World Health Organization dietary recommendations.

The issue highlighted is not limited to a single trading partner or region and may affect multiple Codex Members engaged in the production, export, or import of high oleic sunflower oil.

CCFO29 is invited to

- Consider the issues raised in the discussion paper regarding the compositional specification of stearic acid in high oleic sunflower oil under CXS 210-1999;

- Evaluate the justification for initiating new work based on the submitted discussion paper and project document ; and
- Decide whether to forward the project document to the Codex Alimentarius Commission (CAC49) for approval as new work.

Analysis

Participation and methodology

The proposal is supported by multi-year analytical data (2022–2025) derived from certificates of analysis issued by internationally recognized inspection bodies and reconfirmed by accredited laboratories upon importation. Fatty acid profiles were determined using Codex-aligned ISO gas chromatography methods (GC-FID).

The data set includes consignments originating from major sunflower oil producing regions, providing a representative snapshot of current global production characteristics.

Work elements, outputs and status

Work Element	Actions Taken and Details	Key Outputs and Results	Status and Observations
Evidence generation	Compilation of fatty acid profile data from imported consignments	Consistent identification of stearic acid levels below current Codex minimum	Complete
Analytical methodology	Use of Codex-recognized ISO GC-FID methods	Reliable and comparable analytical results	Complete
Trade assessment	Review of import compliance and rejection risks	Identification of potential trade barriers for compliant oils	Ongoing
Standard coherence	Comparison across sunflower oil categories in CXS 210-1999	Internal consistency gap identified	Requires CCFO consideration

Summary of discussion and commentary

The data presented indicates that the current lower limit for stearic acid in high oleic sunflower oil may no longer fully reflect the natural compositional variability of modern cultivars. While no food safety or nutritional risks have been identified, the existing specification may result in the exclusion of authentic, high-quality oils from international trade.

The proposed amendment is narrow in scope, technically straightforward, and does not require the development of new analytical methods or additional FAO/WHO scientific risk assessments.

Key observations

- The proposal concerns **compositional specifications**, not food safety risk.
- Existing Codex methods of analysis remain fully applicable.
- No additional expert scientific advice (e.g. JECFA, JMPR) is required.
- The proposed amendment may improve alignment between Codex standards and current production and trade realities.

Recommendation

Indicative considerations for regional coordination

Given the reliance of many countries on imported edible oils, coordinated regional discussion ahead of CCFO29 may assist in assessing the broader relevance of the proposal, identifying any additional analytical data, and aligning positions on whether to support the initiation of new work or request further evidence.

- Support forwarding the project document to the Codex Alimentarius Commission (CAC49) for approval as new work, provided that the revision remains limited in scope to the proposed adjustment of the lower bound of stearic acid content;
- Encourage the collection and consideration of additional analytical data from a broader range of producing and importing countries, to confirm the global representativeness of the observed compositional variability;
- Emphasize that any revision should not compromise product identity, authenticity, or consumer confidence, and should maintain consistency across sunflower oil categories within CXS 210-1999; and
- Request that the work be undertaken in a manner that ensures transparency, inclusiveness, and alignment with existing Codex analytical methods, without introducing new testing requirements or trade barriers.