

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FATS AND OILS

Twenty-Sixth Session

Kuala Lumpur, Malaysia, 25 February -01 March 2019

REPORT ON THE OUTCOME OF MONITORING THE CONFORMITY OF NAMED FISH OILS WITH THE REQUIREMENTS (ESPECIALLY THE FATTY ACID PROFILE) OF FISH OIL STANDARD AND ITS EFFECT ON TRADE (REPLIES TO CL 2017/74-FO)

Comments of Norway, European Union and GOED

Norway

We would like to thank Chile and Switzerland for preparing document CX/FO 19/26/1 based on the information received in response to Circular letter CL 2017/74/FO.

Please find below our comments on the issue of monitoring the application of CODEX STAN 329-2017.

We would like to give our support to the conclusions given in para 16a: "*The monitoring of possible effects of the newly adopted standard on trade did not identify any difficulties associated with the implementation of the standard*" and in para 16b: "*Identification of named fish oils by fatty acid profiles was not considered to be a problem by any of the comments given in response to the Circular Letter.*"

We consider this correct based on information given by Codex members. No difficulties associated with the implementation of the standard were identified, and this is in line with our experience as reported in August 2018. Norway is both a major importer of crude oil and a major producer of refined fish oils.

Based on the replies to the Circular letter, **Norway does not support the recommendation given in 16c suggesting that there might be a need for prolonging the time for reporting of data to a 5 or 10 years survey. We see no need for a further survey, as the report clearly concluded that no difficulties are associated with the Codex Standard for Fish Oil.** We would also like to underline that such a survey will be burdensome for members. We would also like to highlight that **Codex has no mechanism in place to routinely monitor application of standards.**

We would rather see that Codex' procedures are used, which allow members that experience problems with a standard, to submit background papers to the relevant committee for discussion related to possible amendments or revision.

EU

Member States Competence
Member State Vote

The Member States of the European Union (MSEU) would like to thank Chile and Switzerland for coordinating the work on the monitoring of the application of the new standard on fish oils (CXS 329-2017).

Based on the substantial amount of data received, there are no problems in the implementation of the standard. For this reason, the MSEU are of the view that there is no need to extend the invitation to countries to provide data as suggested in paragraph 16(c). The MSEU further note that this does not prevent any country in the future to report to the Committee any issues experienced in the implementation of the standard.

GOED

The Global Organization for EPA and DHA Omega-3s (GOED) is an international association of processors, refiners, manufacturers, distributors, marketers, retailers and supporters of products containing eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA) omega-3 fatty acids. GOED's membership represents a broad range of businesses, from small entrepreneurs to multinational food companies. Part of our mission is to ensure that our members produce quality products that consumers can trust. To this end,

GOED, a recognized Codex Observer¹, was intimately involved in discussions about and adoption of the Standard for Fish Oils (CXS 329-2017).²

GOED thanks Chile and Switzerland for preparing document CX/FO 19/26/11³ entitled “Monitoring of the application of the Codex Standard for Fish Oils (CODEX STAN 329-2017)” based on the information received in response to Circular letter CL 2017/74-FO.⁴

While GOED is unaware of any issues involving trade due to the adoption of the Standard for Fish Oils (CXS 329-2017), the reality is that the period of monitoring was short. For this reason, GOED supports an extended period of monitoring.

With respect to section 2.1.1 concerning the suggestion to change the Spanish name for “anchovy oil” from “Aceite de anchoa” to “Aceite de anchoveta,” it’s important to keep in mind that the Standard includes all *Engraulidae*, not just anchoveta. Changing the name would exclude Moroccan and Turkish anchovy oils that are used as fish oil for human consumption today. While the Codex Alimentarius Commission may not be concerned about future production, for the sake of this discussion, it’s important to realize that the proposed change would exclude the oil of any other anchovy fishery that may decide to start producing for human consumption. There are at least 140 species of anchovy. Thus said, while GOED supports a change in the description to section 2.1.1, we recommend a slightly different modification. Below are proposed changes for both the English and Spanish texts. Obviously, there will need to be a discussion concerning the translation in other languages.

Existing English text:

2.1.1 Anchovy oil is derived from *Engraulis ringens* and other species of the genus *Engraulis* (*Engraulidae*).

Proposed English text:

2.1.1 Anchovy oil is derived from anchoveta (*Engraulis ringens*) and other species of the genus *Engraulis* (*Engraulidae*).

Existing Spanish text:

2.1.1 El aceite de anchoa es derivado de la especie *Engraulis ringens* y de otras especies del género *Engraulis* (*Engraulidae*).

Proposed Spanish text:

2.1.1 El aceite de anchoa es derivado de la anchoveta (*Engraulis ringens*) y de otras especies del género *Engraulis*

¹ <http://www.fao.org/fao-who-codexalimentarius/about-codex/observers/observers/obs-list/en/>

² http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCODEX%252FSTAN%252F329-2017%252FCXS_329e.pdf

³ http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fmeetings%252FCX-709-26%252Fworking%252Fdocuments%252Ffo26_11e.pdf

⁴ http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FcircULAR%252F20Letters%252FCL%2525202017-74%252Fcl17_74_e.pdf