



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FATS AND OILS

Twenty-Eighth Session

Kuala Lumpur, Malaysia

19-23 February 2024

### REPLIES TO CL 2021/96-FO: PROPOSAL FOR NEW WORK ON A STANDARD FOR MICROBIAL OMEGA-3 OILS

(Comments of Burundi, Ghana, India, New Zealand, Russian Federation, Saudi Arabia, United Republic of Tanzania and GOED)

#### Burundi

**General comment:** Burundi would like to appreciate the Global Organization for EPA and DHA omega 3s (GOED) for their good work specifically preparation of the discussion paper and Burundi supports the work and its advancement in the step process and that CCFO28 considers the discussion paper.

**Rationale:** Provides opportunity to regulate Microbial Omega-3 Oils as a food, contribute to the safety, quality, and fairness of international food trade by protecting consumer health and removing barriers to trade.

#### Ghana

**Position:** Ghana supports the work to develop a new standard for microbial omega-3 oils for use in human consumption since already there is production to support infant formula production.

**Rationale:** This new work may align with the CCEXEC83(2023) request to consider global efforts to achieve health and nutrition-related goals by reducing non-communicable disease risk factors when undertaking new work.

#### India

India appreciates and supports the work done by the Global Organisation for EPA and DHA omega 3s (GOED) in preparation of this discussion paper.

#### New Zealand

New Zealand would like to thank GOED for preparing the proposal for this new work. New Zealand acknowledges that microbial omega-3 oils are alternative sources of eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA) for vegan and vegetarian diets and can support establishing an internationally harmonised standard to minimise trade barriers. New Zealand can support this new work if there is CCFO delegation volunteered to lead the work for drafting the standard.

#### Russian Federation

The Russian Federation considers it appropriate and relevant to develop the Standard for microbial omega-3 oils.

### Saudi Arabia

Saudi Arabia has reviewed the proposal for new work on a standard for microbial omega-3 oils discussion paper prepared by Global Organisation for EPA and DHA omega 3s (GOED). Saudi Arabia suggested that this proposal need to be referred and studied by the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNSFDU) to further assess the use of this oil in infant formulas, food supplements and other products.

**Saudi Arabia appreciates the opportunity offered to submit this Conference Room Document, looking forward to work on the suggested proposals at the upcoming plenary session of the Commission.**

### United Republic of Tanzania

**General comment:** Tanzania would like to appreciate the Global Organization for EPA and DHA omega 3s (GOED) for their good work specifically preparation of the discussion paper. Tanzania support the work and its advancement in the step process and that CCFO28 considers the discussion paper.

**Rationale:** Provides opportunity to regulate Microbial Omega-3 Oils as a food, contribute to the safety, quality, and fairness of international food trade by protecting consumer health and removing barriers to trade

### GOED

In reply to [CL 2021/96-FO](#), the Global Organization for EPA and DHA Omega-3s (GOED) submitted the Proposal for New Work on a Standard for Microbial Omega-3 Oils ([CX/FO 24/28/12](#)) that will be considered under item 8.2 "Consideration of the proposals for new work and/or amendments to existing Codex Standards: Replies to CL 2021/96-FO." Since GOED submitted its Proposal for New Work, GOED has compiled market data for 2022, demonstrating continued growth for microbial omega-3 oils, which you can find as an Annex to this conference room document (CRD) for your further information and consideration.

The purpose and scope of this new work is to establish an inclusive and overarching Standard providing a harmonised description containing quality and compositional factors for microbial omega-3 oils, for use as an ingredient in foods and food supplements where these are regulated as food. Establishing a Codex Standard for microbial omega-3 oils containing quality and compositional factors will ensure fair practices in trade in these commodities as well as ensure consumers' health protection, which are the purpose and goals of the Codex Alimentarius.

In this regard, GOED would like to bring to the attention of this Committee Codex document CX/FO 24/28/02 on Matters arising from the Codex Alimentarius Commission and its Subsidiary Bodies, which will be considered under agenda item 2. Paragraph 25 reflecting the following conclusion of the 83<sup>rd</sup> Session of the Executive Committee of the Codex Alimentarius Commission (CCEXEC83) in relation to the discussion on new standards or review of standards and guidelines:

*"25. At the request of the WHO representative, CCEXEC83 agreed to request that Codex committees, when prioritizing and undertaking work on new standards or the review of standards and guidelines relating to composition of foods, have due regard to ongoing global efforts to achieve health and nutrition related goals through reducing non-communicable diseases (NCD) risk factors such as sodium intake. "*

A diet low in EPA/DHA increases the risk of NCDs, including cardiovascular diseases. GOED would like to highlight that there is convincing evidence that demonstrates the association between the intake of omega-3 fatty acids EPA and DHA and reduction in risk of NCDs, particularly cardiovascular diseases, which account for most NCDs. More specifically, in a meta-analysis of 42 studies,<sup>1</sup> including almost 150,000 individuals, EPA and DHA intake demonstrated statistically significant reductions in fatal myocardial infarction (-35%), myocardial infarction (-13%), coronary heart disease events (-9%) and coronary heart disease mortality (-9%). GOED believes that establishing a Codex Standard for microbial omega-3 oils will contribute to the ongoing global efforts to achieve health and nutrition related goals through reducing NCDs.

Therefore, GOED looks forward to the Committee's agreement at this session for starting new work on a Codex Standard for Microbial Omega-3 Oils for use as an ingredient in foods and food supplements.

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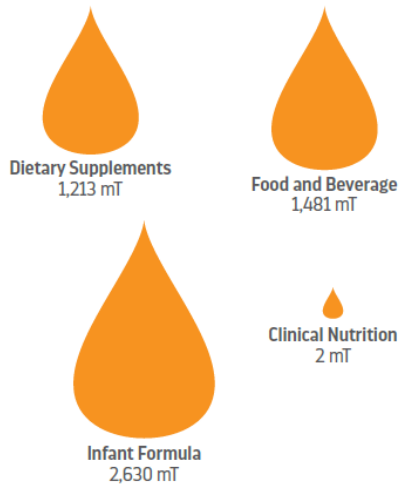
<sup>1</sup> Bernasconi AA, Lavie CJ, Milani RV, Laukkanen JA. Omega-3 Benefits Remain Strong Post-STRENGTH. Mayo Clin Proc. 2021 May;96(5):1371-1372. doi: 10.1016/j.mayocp.2021.03.004. Epub 2021 Apr 8. PMID: 33838920.

**UPDATED MARKET AND TRADE DATE FOR 2022 ON THE CONTINUED GROWTH FOR MICROBIAL OMEGA-3 OILS**

In 2022, by Application:

The following figures provide details of microbial omega-3 oil growth (volume in metric tons (mT)) by application:<sup>2</sup>

**Algae Oil Market by Application (in Metric Tons)**



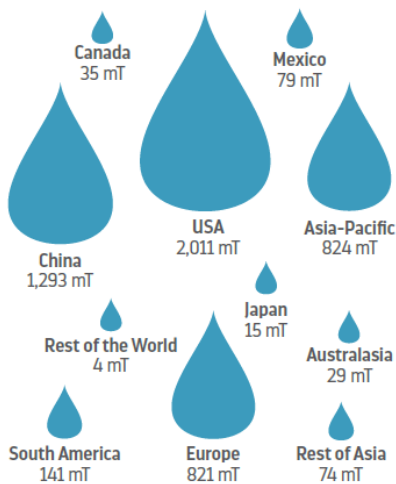
**Algae Oil Market Volume Growth by Application (in Metric Tons) vs. Percent Growth (Change from 2021 to 2022)**

Application	Change in VOLUME (mT)	Change in VOLUME (%)
Clinical Nutrition	<1 mT	5.7%
Dietary Supplements	109 mT	9.9%
Food and Beverage	121 mT	8.9%
Infant Formula	67 mT	2.6%

In 2022, by Region:

The following figures provide details of microbial omega-3 oil growth (volume in metric tons (mT)) by region:<sup>3</sup>

**Algae Oil Market by Region (in Metric Tons)**



**Algae Oil Market Volume Growth by Region (in Metric Tons) and Percent Growth (Change from 2021 to 2022)**

Region	Change in VOLUME (mT)	Change in VOLUME (%)
Asia-Pacific	53 mT	6.9%
Australasia	<1 mT	2.1%
Canada	1 mT	4.5%
China	38 mT	3.0%
Europe	83 mT	11.3%
Japan	<0.1 mT	<0.1%
Mexico	6 mT	8.3%
Rest of Asia	5 mT	6.8%
Rest of the World	<1 mT	2.6%
South America	9 mT	7.0%
USA	102 mT	5.3%

2022, by Region and Application:

The following tables provide detail of microbial omega-3 oil growth in volume (metric tons (mT)) and in value (millions of US dollars) by region and application:<sup>4</sup>

• Volumes in mT:

<sup>2</sup> Market survey data, GOED.

<sup>3</sup> Market survey data, GOED.

<sup>4</sup> Market survey data, GOED.

	Infant Formula			Food and Beverages			Dietary Supplements			Clinical Nutrition		
	2021	2022	Change	2021	2022	Change	2021	2022	Change	2021	2022	Change
Australasia	10	10	1.0%	13	13	3.2%	5.7	5.8	1.8%	-	-	-
Canada	8	8	0.2%	17	18	5.7%	9	10	5.7%	-	-	-
China	1,059	1,089	2.8%	169	176	4.3%	27	29	4.0%	-	-	-
Europe	115	117	1.2%	301	344	14.2%	322	361	12.1%	-	-	-
Japan	-	-	-	13	13	0.8%	2	2	-4.3%	-	-	-
Mexico	4	4	4.8%	69	75	8.5%	-	-	-	-	-	-
Rest of the World	-	-	-	4	4	3.2%	< 1	< 1	0%	-	-	-
Asia-Pacific	414	436	5.2%	218	238	9.0%	139	151	8.4%	-	-	-
Rest of Asia	20	21	4.0%	47	50	8.1%	2	2	4.3%	-	-	-
South America	42	43	2.3%	88	96	9.3%	2	2	5.3%	-	-	-
USA	890	903	1.4%	423	455	7.6%	594	651	9.6%	2	2	5.7%

Volumes in metric tons (mT)

· Value in millions of US dollars:

	Infant Formula			Food and Beverages			Dietary Supplements			Clinical Nutrition		
	2021	2022	Change	2021	2022	Change	2021	2022	Change	2021	2022	Change
Australasia	\$0.4	\$0.4	-2.0%	\$0.7	\$0.7	0.2%	\$0.4	< 0.4	0%	-	-	-
Canada	\$0.3	\$0.3	-2.7%	\$1.0	\$1.0	2.6%	\$0.6	\$0.7	1.6%	-	-	-
China	\$45.0	\$44.9	-0.2%	\$9.7	\$9.8	1.3%	\$1.9	\$1.9	1.3%	-	-	-
Europe	\$4.9	\$4.8	-1.7%	\$17.3	\$19.2	10.9%	\$22.5	\$24.5	8.8%	-	-	-
Japan	-	-	-	\$0.7	\$0.7	-2.1%	\$0.2	\$0.1	-11.8%	-	-	-
Mexico	\$0.2	\$0.2	1.7%	\$4.0	\$4.2	5.3%	-	-	-	-	-	-
Rest of the World	-	-	-	\$0.2	\$0.2	0.2%	< 0.1	< 0.1	< 0.1%	-	-	-
Asia-Pacific	\$17.6	\$18.0	2.1%	\$12.6	\$13.3	5.8%	\$9.7	\$10.2	5.2%	-	-	-
Rest of Asia	\$0.9	\$0.9	1.0%	\$2.7	\$2.8	5.0%	\$0.2	\$0.2	0%	-	-	-
South America	\$1.8	\$1.8	-0.7%	\$5.1	\$5.4	6.1%	\$0.1	\$0.1	0%	-	-	-
USA	\$37.8	\$37.2	-1.6%	\$24.4	\$25.5	4.5%	\$41.5	\$44.2	6.4%	\$0.1	\$0.1	2.6%

Value in millions of US dollars (MM US\$)

## Forecast

These are the volumes by region and by application for 2022, followed by the growth rate from 2021-2022 and then the average annual growth rate expected to be seen to 2025:<sup>5</sup>

Forecast by region:

<sup>5</sup> Market survey data, GOED.

	2022 volume (mT)	2021-22	To 2025 (average)
Australasia	29	2.1%	2.2%
Canada	35	4.4%	4.6%
China	1,293	3.0%	3.0%
Europe	821	11.3%	7.8%
Japan	15	<0.1%	0.1%
Mexico	79	8.3%	8.3%
Rest of the World	4	2.6%	2.6%
Asia-Pacific	824	6.9%	6.9%
Rest of Asia	74	6.8%	6.9%
South America	141	7.0%	7.2%
USA	2,011	5.3%	5.6%
<i>Global</i>	5,326	5.9%	5.6%

## Forecast by application:

	2022 volume (mT)	2021-22	To 2025 (average)
Infant Formula	2,630	2.6%	2.7%
Food and Beverage	1,481	8.9%	7.0%
Dietary Supplements	1,213	9.8%	10.0%
Clinical nutrition	2	5.7%	5.7%
<i>Global</i>	5,326	5.9%	5.6%