

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 7.4

CRD22 Rev

Original language only

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**CODEX COMMITTEE ON FATS AND OILS**  
**Twenty-Seventh Session**  
**Virtual, 18 - 26 October 2021**  
**Comments from International Dairy Federation**

The International Dairy Federation is opposed to the proposal for new work: revisions to the standard for fat spreads and blended spreads with regards to provision 3.1.1.1 and the use of the terminology “plant butter”.

The proposal to permit the use of the term “plant butter” as a new name for margarine would contravene the Codex General Standard for Use of Dairy Terms (GSUDT) (CXS 206-1999). Section 4.6.3 of the GSUDT prohibits the use of dairy terms from being used on any label, commercial document, publicity material or any form of point of sale presentation for a product that is not a milk, milk product, or composite milk product. Therefore, it is a contravention of the GSUDT to use the dairy term “butter” in relation to margarine.

The discussion paper for the proposal for new work fails to identify the obvious conflict with GSUDT and instead mistakenly justifies the use of the term “plant butter” on the basis of the terms “cocoa butter” and “shea butter” being permitted within other Codex texts. Both these terms would indeed be permitted under the traditional usage exception in section 4.6.2 of the GSUDT but such an exception does not apply to a new term like “plant butter” which has no established traditional usage.

Additionally, the discussion paper has misquoted the referenced study on lactose malabsorption and confused this issue with lactose intolerance in the following section of the paper:

*iii. “It should also be noted that levels of lactose intolerance are very high in most countries outside Europe and North America, in several cases almost 100%, while globally 68% of adults are lactose intolerant<sup>1</sup>. Fat Spreads provide an alternative to Dairy Spreads and Butter and play an important role in provision of vitamins and essential fatty-acids, and so barriers to popular use should be minimised.”*

It is important to note that the majority of people with lactose malabsorption do not have lactose intolerance, and the vast majority will tolerate 12g lactose in a single dose with no or minor symptoms (EFSA 2010<sup>1</sup>; NIH 2010<sup>2</sup>). Furthermore, it should be noted that dairy butter and dairy blends contain only trace amounts of lactose. As such, this statement is irrelevant and incorrect.

IDF is strongly oppose to this CCFO new work proposal as outlined in CX/FO 21/27/8 Part IV and would support the discontinuance of it.

---

<sup>1</sup> EFSA Panel on Dietetic Products, Nutrition and Allergy (NDA). Scientific Opinion on lactose thresholds in lactose intolerance and galactosaemia. *EFSA Journal* 2010; 8 (9); 1777

<sup>2</sup> Reference National Institutes of Health (NIH) Consensus Development Conference statement on Lactose Intolerance and Health. February 22–24, 2010 [http://consensus.nih.gov/2010/images/lactose/lactose\\_finalstatement.pdf](http://consensus.nih.gov/2010/images/lactose/lactose_finalstatement.pdf)