# COMMISSION DU CODEX ALIMENTARIUS





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Point 9 de l'ordre du jour

CX/CAC 23/46/22

# PROGRAMME MIXTE FAO/OMS SUR LES NORMES ALIMENTAIRES COMMISSION DU CODEX ALIMENTARIUS

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Nouvelles sources d'aliments et nouveaux systèmes de production d'aliments

#### **CONTEXTE** 1.

- À sa 45e session1, la Commission du Codex Alimentarius (la Commission) a examiné le rapport du Sous-Comité du Comité exécutif sur les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments<sup>2</sup>. Le sujet a été débattu par la Commission, à sa 44e session, et par le Comité exécutif, à ses 82e et 83e sessions, et deux vues quant aux approches possibles ont été exprimées:
  - étant donné la complexité et la diversité des nouvelles sources d'aliments et des nouveaux systèmes de production d'aliments, et afin de préparer l'avenir du Codex de manière proactive, d'autres débats sur les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments pourraient être tenus dans le cadre d'un groupe de travail électronique relevant de la Commission;
  - les mécanismes existants au sein du Codex sont suffisants pour traiter toute proposition de nouveaux travaux relatifs aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments. Les membres du Codex doivent soumettre des propositions de nouveaux travaux fournissant au Codex des sujets concrets permettant d'examiner plus avant les mécanismes de travail.
- 1.2 Si la Commission, à sa 45e session, a reconnu la nécessité pour le Codex de travailler de manière souple et en temps voulu afin de prendre en compte les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments en tant qu'élément important dans l'élaboration de normes internationales visant à protéger la santé des consommateurs et à garantir des pratiques équitables dans le commerce des produits alimentaires, il n'y a pas eu d'accord sur la meilleure voie à suivre ou la nécessité d'un nouveau mécanisme de coordination transversal pour les travaux du Codex relatifs aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments.
- Par conséquent, il a été convenu de continuer de recueillir les observations des membres et observateurs afin de recenser d'éventuelles questions relatives aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments qui ne pouvaient pas être traitées dans le cadre de la structure et des procédures actuelles et les manières possibles d'y répondre, en vue de leur examen par la Commission à sa 46e session.
- L'annexe I rassemble les observations reçues de 21 membres et quatre observateurs en réponse à la lettre circulaire CL 2023/31/OCS-CAC. Les vues diverses exprimées en réponse à la lettre circulaire sont résumées ci-après.

<sup>&</sup>lt;sup>1</sup> REP22/CAC, paragraphes 23 à 31.

<sup>&</sup>lt;sup>2</sup> CX/EXEC 22/83/4.

## 2. VUE D'ENSEMBLE DES OBSERVATIONS REÇUES

### 2.1 Observations générales:

 Les avis restent divisés quant à la nécessité de créer un comité, une équipe spéciale ou un groupe de travail électronique pour traiter les demandes de nouveaux travaux dans le domaine des nouvelles sources d'aliments et des nouveaux systèmes de production d'aliments, certains membres et observateurs (la plupart) jugeant cette création nécessaire, tandis que d'autres sont d'avis que la structure actuelle du Codex permet de prendre en compte les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments et prête à cela.

- Le Comité exécutif et la Commission ont été mentionnés au sein de la structure déjà existante en tant que possibles destinataires des futures demandes et il a été noté qu'une proposition avait déjà été présentée au Comité sur la nutrition et les aliments diététiques ou de régime.
- Ceux qui ont noté la nécessité de disposer d'un nouvel espace consacré exclusivement aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments ont mentionné, comme possibilités, la création d'un comité, d'une équipe spéciale ou d'un groupe de travail électronique.
- Un membre a présenté un mandat pour un nouveau groupe intergouvernemental spécial sur les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments.

### 2.2 Observations particulières

a) Veuillez recenser les thèmes particuliers relatifs aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments pour lesquels une norme, une directive ou un code d'usages du Codex est nécessaire mais ne peut être élaboré(e) à l'aide de la structure et des procédures actuelles d'établissement de normes du Codex.

Les thèmes suivants, spécifiques des nouvelles sources d'aliments et des nouveaux systèmes de production d'aliments, ont été recensés comme domaines dans lesquels il conviendrait d'élaborer une norme du Codex:

- un nouveau système de nomenclature pour les aliments à base d'algues;
- une norme visant à soutenir les mesures d'atténuation destinées à réduire ou éviter les risques potentiels pour la sécurité sanitaire susceptibles d'avoir des incidences sur la santé des consommateurs en ce qui concerne les systèmes de production de protéines algales;
- les bonnes pratiques relatives à la chaîne de culture des algues;
- l'utilisation de nanomatériaux comme additifs dans les aliments;
- des orientations relatives à l'approbation de nouveaux ingrédients et de nouvelles technologies: cela comprend les technologies telles que l'agriculture cellulaire (ingénierie tissulaire et fermentation de précision) et les nouveaux ingrédients produits au moyen de ces technologies;
- une norme complète ou un ensemble de normes relatives aux insectes comestibles, comprenant: une définition des insectes comestibles; les types et l'éventail d'insectes comestibles pouvant être utilisés; des orientations relatives aux installations et au matériel de sélection, de production, de transformation et de stockage des insectes comestibles; des orientations relatives à la production et à la gestion de l'hygiène; une norme sur les résidus de pesticides et les médicaments vétérinaires; et une norme sur les processus de fabrication et les méthodes de stockage visant à empêcher la rancidité;
- concernant les aliments issus de cultures cellulaires présentant un fort potentiel de croissance sur le marché, la nécessité d'élaborer: des critères relatifs aux maladies, aux infections et à la contamination par des micro-organismes pathogènes présents dans la carcasse de l'organisme d'origine; une ou plusieurs normes sur les résidus tels que les antibiotiques, les hormones et les pesticides; une ou plusieurs normes relatives à la comparaison des génomes, des protéomes et des métabolites entre les cellules d'origine et les cellules de culture, et à l'analyse de leur équivalence, pour chaque processus de fabrication, ainsi qu'à l'évaluation des allergies; des normes relatives à l'évaluation de l'équivalence génétique entre les cellules d'origine et les cellules de culture pour chaque processus de fabrication; des directives relatives à la gestion des facteurs de risque (notamment les allergènes) pouvant exister en cas de différences génétiques;
- l'harmonisation des terminologies relatives aux produits alimentaires dérivés de nouvelles sources d'aliments et de nouveaux systèmes de production d'aliments;

• les bonnes pratiques en matière de stockage, de transport et de production des produits alimentaires dérivés de nouvelles sources d'aliments et de nouveaux systèmes de production d'aliments;

- l'analyse des risques liés aux produits alimentaires dérivés de nouvelles sources d'aliments et de nouveaux systèmes de production d'aliments;
- des orientations relatives à l'approbation de nouveaux ingrédients et de nouvelles technologies;
- des spécifications relatives à la qualité et à la sécurité sanitaire des nouvelles sources d'aliments et des nouveaux systèmes de production d'aliments pour les systèmes nationaux de contrôle des aliments.
- b) Veuillez indiquer les difficultés ou insuffisances qui, selon vous, empêchent le système actuel de traiter les thèmes particuliers recensés concernant les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments, et d'éventuelles approches qui permettraient d'y remédier.
  - Parmi les raisons pour lesquelles les questions relatives aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments ne sont pas traitées, les suivantes ont été mentionnées:
    - l'absence de définition claire des nouvelles sources d'aliments et des nouveaux systèmes de production d'aliments;
    - o la nouveauté;
    - o le faible volume commercial.
- c) Selon vous, y a-t-il des aspects pertinents pour l'établissement de normes qui n'ont pas encore été examinés par la Commission lors des débats concernant les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments? Si oui, veuillez préciser et indiquer les points que vous considérez essentiels.
  - La majeure partie des réponses indiquaient qu'aucun aspect pertinent n'avait pas été pris en compte par la Commission lors des débats sur les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments. Les réponses dans lesquelles il était indiqué que certaines questions n'avaient pas été abordées mentionnaient des débats portant sur la sensibilisation des consommateurs, les questions d'éthique et la possibilité que les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments soient associés à d'autres facteurs à prendre en compte.
- d) Prévoyez-vous de soumettre des thèmes relatifs aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments en vue de leur examen par le Codex à court ou moyen terme? Si oui, veuillez indiquer le ou les thèmes et la voie par laquelle vous soumettrez peut-être la ou les propositions (par exemple, comité spécifique ou Comité exécutif).
  - Des membres ont mentionné la possibilité de soumettre divers thèmes relatifs aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments afin qu'ils fassent l'objet de nouveaux travaux.
  - Des membres ont mentionné l'intention de soumettre de nouveaux travaux relatifs aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments, tandis qu'un membre a indiqué l'avoir déjà fait auprès d'un comité existant du Codex (le Comité sur la nutrition et les aliments diététiques ou de régime).
  - La plupart des membres ont fait savoir qu'ils n'avaient pas prévu de soumettre, à court terme, de nouveaux travaux concernant de nouvelles sources d'aliments et de nouveaux systèmes de production d'aliments.
  - Des membres ont indiqué qu'ils présenteraient des thèmes une fois qu'il existerait un organe spécialement consacré aux nouvelles sources d'aliments et aux nouveaux systèmes de production d'aliments.

# 3. ANALYSE DES OBSERVATIONS DANS LE CONTEXTE DES PROCÉDURES ET DES PRATIQUES EXISTANTES

3.1 Il ressort des observations que les membres pourraient en effet présenter des propositions de nouveaux travaux qui relèveraient de la catégorie des nouvelles sources d'aliments et des nouveaux systèmes de production d'aliments, et qu'une proposition a déjà été soumise au Comité sur la nutrition et les aliments diététiques ou de régime. Cependant, les avis divergent quant à la manière dont le Codex pourrait répondre à ces propositions. La mise en place d'un nouveau mécanisme de travail au sein du Codex n'est pas à prendre à la légère, car elle suppose un coût non seulement pour l'éventuel pays hôte, mais aussi pour tous les membres, les observateurs et le secrétariat du Codex. Le calendrier des réunions du Codex est déjà bien rempli, par conséquent, l'ajout de

réunions supplémentaires devrait, idéalement, être fondé sur des propositions de travaux clairement formulées, dont la Commission estime qu'elles ne peuvent être traitées par aucun organe subsidiaire existant du Codex.

- 3.2 Le Codex a montré par le passé que lorsque la nécessité de créer, par exemple, une équipe spéciale avait été clairement établie, il avait pris la décision de créer cette équipe, en veillant à ce qu'elle ait un mandat clair. Une telle approche pourrait être, à l'avenir, un moyen adéquat d'aborder les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments. Sans propositions de travail claires, il est difficile d'évaluer précisément la nécessité de créer un nouveau mécanisme de travail au sein du Codex. Étant donné que certains membres ont fait part de leur intention de soumettre des propositions, le rôle que le Codex peut jouer en ce qui concerne les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments pourrait être beaucoup plus clair dans un avenir proche. Actuellement, au sein du Codex, il est possible de soumettre de nouveaux travaux par l'intermédiaire d'un comité existant, ou directement au Comité exécutif et à la Commission aux fins de leur examen. C'est la Commission qui décide en dernier lieu comment et où les nouveaux travaux devraient être menés. Par conséquent, le moment le plus approprié pour envisager le mécanisme de travail, qu'il existe déjà ou qu'il soit nouveau, est probablement lorsque la nature des travaux à entreprendre est clairement établie, ce qui peut être fait au moyen de documents de travail et de nouvelles propositions de travail.
- 3.3 L'élaboration de documents de travail préalables aux descriptifs de projet s'est avérée une méthode précieuse au sein du Codex pour examiner la nécessité d'une norme du Codex dans un domaine particulier. Ces documents peuvent faire l'objet de débats au sein d'un comité particulier, lorsque celui-ci est clairement identifié par le membre soumettant le thème, ou au sein du Comité exécutif, puis de la Commission, lorsqu'on ne peut déterminer de manière claire à qui le membre pourrait soumettre la proposition.
- 3.4 Dans l'évaluation de 2003 du Codex, il était recommandé que ce dernier prête une attention particulière aux travaux horizontaux portant sur la sécurité alimentaire de nombreux aliments plutôt qu'il se concentre sur les normes relatives à des produits particuliers; les comités horizontaux occupent donc une place prépondérante dans le calendrier des réunions du Codex, comparé aux comités s'occupant de produits ou aux comités verticaux au cours des premières années du Codex. Par conséquent, dans nombre de cas, les moyens d'aborder les aspects liés à la sécurité sanitaire des aliments, que ceux-ci soient nouveaux ou non, existent déjà.
- 3.5 L'une des difficultés mises en relief était l'absence de définition des nouvelles sources d'aliments et des nouveaux systèmes de production d'aliments. Des thèmes comme celui-ci peuvent déjà être présentés en tant que propositions de nouveaux travaux, car la définition des termes relatifs à un groupe de produits particulier est une approche qui a été suivie par le passé. Comme certains membres estiment que cette première étape est importante, il serait primordial qu'une proposition de nouveaux travaux dans ce domaine soit présentée. Il incombe ensuite à la Commission d'identifier le mécanisme le mieux approprié pour entreprendre les travaux.
- 3.6 Compte tenu de l'augmentation des coûts, il est essentiel de travailler efficacement et d'établir des priorités. Cela s'applique tant aux domaines de travail actuels qu'aux nouveaux. Les propositions de travail permettent d'établir des priorités.

### 4. **RECOMMANDATIONS**

- 4.1 À sa 46<sup>e</sup> session, la Commission est invitée à:
  - prendre acte de la diversité des vues concernant la manière dont le Codex pourrait travailler sur les nouvelles sources d'aliments et les nouveaux systèmes de production d'aliments, et noter qu'il est probable que de nouvelles propositions de travail dans ce domaine soient soumises au cours des prochaines années;
  - informer les membres qu'il n'y a actuellement pas d'obstacles procéduraux à la soumission de nouvelles propositions de travaux concernant de nouvelles sources d'aliments et de nouveaux systèmes de production d'aliments, et encourager vivement les membres à soumettre des documents de travail et/ou de nouvelles propositions de travaux aux comités existants du Codex ou au Comité exécutif afin de mieux informer la Commission de la nature des travaux à entreprendre dans ce domaine;
  - souligner qu'il appartient à la Commission de déterminer comment les nouveaux travaux convenus devraient être entrepris, en notant que lorsque les travaux à entreprendre sont clairement définis, la Commission peut, s'il y a lieu, mettre en place un nouveau mécanisme de travail, comme un groupe de travail électronique ou physique, une équipe spéciale ou un nouveau comité.

Appendix I
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# COMMENTS ON POSSIBLE ISSUES RELATED TO STANDARD SETTING FOR NEW FOOD SOURCES AND PRODUCTION SYSTEMS (NFPS) THAT COULD NOT BE ADDRESSED BY THE CURRENT CODEX STRUCTURE AND PROCEDURES AND OPTIONS TO ADDRESS THEM

(Comments in reply to CL 2023/31/OCS-CAC)

Comments of Australia, Brazil, Canada, Colombia, Costa Rica, Ecuador, Egypt, European Union, Iran, Iraq, Kazakhstan, Kenya, New Zealand, Norway, Peru, Republic of Korea, Saudi Arabia, Singapore, Thailand, Uruguay, USA and European Vegetable Protein Association, Food Industry Asia, Good Food Institute, IDF/FIL

The comments below are those received through the Codex Online Commenting Systems (OCS), or via email by the time this document was issued. The OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardized way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters.

The comments received are presented in a table format, with two columns as follows:

- First column Presents the comments with the rationale.
- Second column Presents the provider of the comments (name of country or observer)

### **GENERAL COMMENTS**

COMMENT	MEMBER / OBSERVER
Currently, Brazil understands that the structure and procedures within Codex are sufficient to handle any new work proposals on NFPS.	Brazil
Concerns regarding labelling, nutrition, and specific safety aspects related to NFPS fall under the mandate of Codex General Subject Committees. Labelling issues are in the scope of the Codex Committee on Food Labelling (CCFL); nutritional matters should be handled by the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU), and contaminants concerns are dealt with by the Codex Committee on Contaminants in Foods (CCFC). Moreover, certain NFPS might qualify as food additives, placing them under the mandate of the Codex Committee on Food Additives (CCFA).	
Certain NFPS are associated with products that are already covered by Codex Standards developed by Commodity Committees. For instance, plant-based protein alternatives are covered by the General Standard for Vegetable Protein Products and the General Guidelines for the Utilization of Vegetable Protein Products in Foods. These standards were developed by the Codex Committee on Processed Fruits and Vegetables (CCPFV), which is currently adjourned sine die.	

Risk analysis guidance on certain NFPS and the development of standards that fall outside the mandate of Codex Commodity Committees could be dealt with by Ad hoc Codex Intergovernmental Task Forces and Joint FAO/WHO expert bodies and consultations. Currently, Brazil understands that the structure and procedures within Codex are sufficient to handle any new work proposals on NFPS.	
Kazakhstan considers the need to work more horizontally on NFPS.	Kazakhstan
New Zealand (NZ) appreciates the opportunity to comment on CL 2023/31/OCS-CAC the 'Request for comments on possible issues related to standard setting for new food sources and production systems (NFPS) that could not be addressed by the current Codex structures and procedures and options to address them'.  We would like to thank the Chairperson of the CCEXEC sub-committee for leading this workstream including the completion of the comprehensive report.	New Zealand
NZ has the following comments in response to CL 2023/31/OCS-CAC.  NZ considers that the evidence provided by the membership through the work of the CCEXEC subcommittee strongly confirms that there are no specific issues related to NFPS within the current Codex standard-setting. Furthermore, existing structures and procedures adequately cover all specific NFPS that require a Codex standard, guideline or code of practice.	
As with the development of any Codex standard, NZ considers that the level of Codex involvement in standard setting for NFPS should be commensurate with the level of risk posed. In this way, risk analysis enables us to estimate the risk to human health and safety of a food, so that appropriate measures can be implemented to control and communicate those risks.	
We note that, in many instances, NFPS are proposed to address global climate change, food insecurity and sustainability challenges. We agree Codex standards have a role in helping to address global nutritional, sustainability and food insecurity challenges to the extent of Codex's mandate.	
NZ notes that Codex already supports a wide variety of innovative NFPS. There are also examples where, due to the low level of risk posed, national legislative approaches alone are sufficient to support such innovation globally.	
It is NZ's view, where issues arise as to whether a NFPS is included in the scope/TOR of a relevant Codex Committee, the first step should be clarifying the scope/TOR, and if necessary, seek approval to explicitly cover and/or extend the scope/TOR for the Committee (within the extent of Codex's mandate).	
As such NZ does not see the need for an e-WG to explore this aspect further.	
Singapore would like to commend the work of the CCEXEC Sub-committee on New Food Sources and Production Systems (NFPS) in supporting Codex Members and Observers to share views on NFPS. We would also like to thank the Codex Secretariat for consolidating the collegial discussions on NFPS during CAC45, and for its efforts to advance this work through the circular letter.	Singapore
Singapore supports the establishment of a Codex ad hoc inter-governmental task force with specific terms of references (TORs) to work on emerging topics related to NFPS, and for a defined duration to deliver the outcomes of the TORs. As outlined in CRD34 rev. during CAC45,	

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Singapore views that the establishment of an ad hoc inter-governmental task force, as opposed to using existing Codex structures, is necessary to provide Codex with sufficient agility to respond to the rapidly growing and varied nature of NFPS. This agility is critical for Codex to minimise barriers to the trade of food from NFPS, so that they can contribute to a supply of safe food around the world, in alignment with Codex's dual mandate of protecting consumer health and promoting fair food trade practices.  Singapore also had an exchange of views with other Codex Members when preparing our response. There was a shared view among some Members that because NFPS spanned across wide-ranging disciplines, the existing Codex structure and mechanism is insufficient for Codex to address NFPS in a timely manner, and to prioritise NFPS-related topics among other non NFPS-related topics. Therefore, there was support for the establishment of an ad hoc inter-governmental task force for NFPS.	
Thailand would like to provide general comment as follows;	Thailand
In Thailand, the prominent topics within NFPS are include, edible insects, insects for feed, plant-based foods, seaweeds, microalgae and aquatic plants. For food safety aspects, we viewed that Codex horizontal standards could cover some of the safety requirements of NFPS. However, for quality aspects, the current vertical standards may not be applicable to NFPS if they are not related to a product that already has a Codex standard. The establishment of a new task force may be necessary with a specific mandate to work on for this aspects. It should be noted that the common agreed definition of "new food sources and production systems" and "novel foods" should be further clarified before embarking on new work on NFPS.  Thailand has concern related to food safety of new food derived from new technological innovations especially cell culture-based food products. Advice from the FAO/WHO expert bodies and/or expert consultations would be necessary. In addition, the diversification of national legislation relevant to the registration of novel foods for placing on the market could raise barriers to international trade. Therefore, Codex committee should consider to develop the registration guideline for novel foods to reduce trade barriers.  In short term, Thailand is not planning to propose any topics related to NFPS for consideration by Codex.	
General Comments:	USA
The United States believes that New Food Sources and Production Systems (NFPS) is an important topic and welcomes the forward-looking discussion on this subject in Codex. However, it would be challenging to design a single mechanism for standardizing new technologies, many of which are still in the research and development stage and with which members have little or no experience, or knowledge of what is yet to be created.  While the U.S. food system has some experience with many of the NFPS, there is currently still a need to understand and learn more about the impact of specific NFPS in terms of potential food safety, regulatory, labelling, nutritional, and quality issues. It is also difficult to imagine a single mechanism capable of effectively drafting standards for all foods, all new production systems, or all new technologies, and to consider all aspects of such products, such as hygiene, contaminants and potential residues in food, nutrition, and other subjects already considered by existing committees. Many of the issues that may be raised by NFPS may be addressed by the standing general subject committees, which can deal with any identified unique food safety or fair trade issues consistent with their terms of reference.	
Codex should only develop vertical/commodity standards when existing standards exclude these new production processes for analogous foods. Not all foods require a Codex standard. In some cases, it may be appropriate to modify existing Codex texts to accommodate new production processes. (For example, it may be appropriate to develop new food categories in the General Standard for Food Additives.)	
Finally, the United States believes that new work should proceed when it is supported by sufficient science and there is significant international trade, consistent with the Codex Working Principles for Risk Analysis and an evaluation according to the Codex Criteria for the Establishment of	

Work Priorities.	
For these reasons, the United States believes that Codex should utilize existing mechanisms and should review any new work on a case-by-case basis, as it currently does, to ascertain if an existing committee or existing committees are best suited to undertake the work. Working groups could also provide a mechanism for initial review when necessary and make recommendations to the Codex Executive Committee and the CAC for assigning portions of the work to the best-suited existing committee(s).	
The Good Food Institute (GFI) appreciates the opportunity to comment on these important issues. GFI's comments apply to standard-setting and related matters pertaining to the alternative proteins subcategory of NFPS, including cultivated meat, fermentation-derived ingredients and foods, and plant-based protein alternatives.	Good Food Institute
With respect to standard-setting for alternative proteins, any new or amended Codex standards, guidelines, or codes of practice should be flexible enough to encourage innovation rather than stifle it, to allow for maximum flexibility in the technology used to produce foods, and to account for the variation among categories of alternative proteins. Otherwise, the pace of evolution and diversity of materials in the alternative protein space may quickly render Codex texts not fit for purpose.	
Such texts should be science- and risk-based and informed by sufficient scientific expertise. As newer alternative proteins become more established in the market and in international trade, an ad hoc intergovernmental task force or a joint electronic working group (J-EWG) involving relevant committees could potentially assist in ensuring that horizontal issues relevant to these products—such as whether new principles or guidelines relating to food safety assessments are needed and whether existing texts should be revised—are addressed holistically and consistently across the relevant committees and that essential scientific expertise is gathered to establish the foundation for new or revised texts.	
Any Codex standards or related texts should not apply needlessly burdensome treatment to alternative proteins or other NFPS that other food categories are not subject to. For example, developing a nutrition composition guideline applying only to plant-based and other alternative protein foods or beverages without doing the same for all foods and beverages could create a distortion of fair practice in trade as well as a disparity in perception between foods that are presumed to be nutritionally sound and those that are not. [See GFI's CRD 33 to CCNFSDU43]. Similarly, clear and accurate labeling is essential to consumer protection and fair practices in trade, and Codex labeling standards and guidelines should enable a level playing field for alternative proteins. Such standards and guidelines should avoid mandating the use of inaccurate or disparaging terms, or terms that consumers do not understand, on the labels of alternative protein products.	
GFI stands ready to provide technical assistance to the CAC and any Codex committees, working groups, or task forces undertaking work relating to alternative proteins.	
The International Dairy Federation is not aware of any NFPS topics which need special attention or a new structure or body within the Codex system as it appears that any issues can be dealt with, in the current Codex operational structure. Should the Commission conclude at any time that the current Codex structure is not sufficient to address identified standardization and/or determine that a new structure or body within the Commission is needed despite the above stated IDF position, we reiterate the importance that the terms of reference of any new work or structure reflect the existence of and not undermine existing Codex texts.	IDF

# SPECIFIC COMMENTS

Australia has identified none.	Australia
Canada has identified none.	Canada
a estructura actual del Codex Alimentarius permite abordar nuevos asuntos relacionados con las fuentes de alimentos y sistemas de producción (FASPN). Lo que se requiere, tal como se concluyó en la CAC, es trabajar de manera flexible y oportuna para garantizar la coordinación de los diferentes comités.	Colombia
Como ya se ha mencionado en los diferentes debates del CCEXEC y la CAC, Costa Rica considera que, el Manual de Procedimiento establece los mecanismos necesarios para abordar cualquier propuesta de trabajo nuevo sobre las FASPN. Adicionalmente, los comités han implementado en sus agendas el tema "criterios para la evaluación y el establecimiento de prioridades del trabajo" con el fin de identificar nuevos trabajos y establecer su orden de prioridad de modo que en un futuro sea adecuado para los fines previstos.  Por lo anterior, Costa Rica considera que la estructura y los instrumentos con los que cuenta el Codex, permiten desarrollar cualquier texto del Codex en el ámbito de sus competencias, incluyendo la solicitud de asesoramiento cuando se considere necesario a los grupos de expertos o en su efecto a los comités horizontales que corresponda.	Costa Rica
Ecuador actualmente no cuenta con temas específicos que requieran la elaboración de una norma, directriz o código de prácticas del Codex; sin embargo, considera que los temas que al momento se están abordando en los diferentes comités técnicos, están bien definidos.  Por otra parte, creemos pertinente que se cuente con una definición clara de las fuentes de alimentos y sistemas de producción nuevos (FASPN) donde se especifique el alcance para facilitar nuevos debates que vayan presentándose en función de este tema; es probable que esto viabilice la determinación de nuevos temas.	Ecuador
I- There is a growing global interest in alternative sources of proteins as a new food source for sustainable protein supply. Recent research has indicated that vegan and microbial proteins (single-cell proteins sourced from algae, fungi, and bacteria) are sources of food. Algae-based oods have become mainstream among consumers in recent years, owing to their benefits. Adopting (i) a new system for nomenclature, (ii) good practices for the algae cultivation chain, and (iii) mitigation measures to reduce or prevent potential safety hazards that may affect consumer health are required for these algal protein production systems.  2- The aquaculture production systems have experienced rapid development in many countries and have become an important contributor to cood security and the economy. More research on modern aquaculture farming practices, environmental integrity, labelling of aquaculture products, and maximum limits for cross-cutting and emerging chemical and microbial hazards are required.  3- Entailing special farming of food and indoor vertical soilless protected farming approaches (hydroponic and aquaponics greenhouse systems) to grow high-value products (such as vegetables, fruits, and seedlings) that increase food yields, act as an efficient option for water	Egypt

scarcity challenges, and offset the effects of climate change. Good greenhouse high-value food production Practices and technologies need to be addressed and represented by Codex.	
The EU and its Member States (EUMS) note that the submissions of Codex members and observers that are summarised in Appendix II of CX/EXEC 22/83/4 identify different types of NFPS (e.g. Cultivated meat, seafood and dairy, fermentation-derived ingredients, plant-based protein alternatives, edible insects, seaweed or microalgae). For each of these NFPS, the document provides preliminary considerations on the aspects that could merit Codex work. The EU is of the view that these considerations would merit exchanges in Codex that would enable to identify areas of common interest and on which there would be consensus for further work. The EU and its Member States would in particular support exchanges on new food sources and production systems that can contribute to the transition towards sustainable food systems.	European Union
The transition of herbal teas from natural to commercial and industrial production is indeed a complex issue. This transition often involves the use of pesticides, fertilizers, and other agricultural practices that can introduce contaminants like pesticide residues, heavy metals and mycotoxins into the products. These concerns are typically addressed through regulatory bodies like the Spices and Culinary Herbs Codex Committee, which may focus on the physico-chemical characteristics of these products.	Iran
<ul> <li>Using Nano-materials in foods as additives</li> <li>Foods produced using Food printers</li> <li>Cell based foods</li> </ul>	Iran
عضوية مصادر او اتية بصادر من بالبروتين الغذية الاغذية	Iraq
(Protein-rich foods from plant or organic sources – translation by GDC)	
The global demand for proteins is changing, creating opportunities for alternative sources of proteins such as cell-based and other possible protein sources e.g., insects, seaweed, etc. As the global demand for proteins grows, many in the food sector are looking into opportunities to expand the scope of diverse sources of proteins that can be both environmentally sustainable and nutritionally sound. The commercial landscape for cell-based food is fast expanding. As such foods are becoming a reality, national food safety authorities need to be prepared to regulate them and authorize them for use by food business operators.  So, in this context, the topic below which is not covered within the scope of current Codex committees will be an important basis for standardization of what to be considered as NFPS.  Kenya proposes the development of Guidance on the Approval of new ingredients and new technologies: This includes technologies like Cellular Agriculture (tissue engineering and precision fermentation) and new ingredients that are produced using such technologies.	Kenya
Rationale:  To develop guidance that may be used by member countries while evaluating new technology or new ingredient developed by such technology, need cross-functional experts. Unfortunately, this is not within the terms of reference of current Codex subsidiary committees.	
New Zealand considers that current Codex standard-setting structure and procedures cover all specific NFPS that require a Codex standard, guideline or code of practice.	New Zealand
We see the need to work more horizontally on NFPS. We would also like to refer to our previous submission of comments and CX/EXEC 22/83/4, and especially note that for example seaweed is a commodity which would benefit from more horizontal work (safety, nutrition, quality and labelling) and that this commodity does not naturally fall under a specific committee.	Norway

Los temas específicos de FUENTES DE ALIMENTOS Y SISTEMAS DE PRODUCCIÓN NUEVAS - FASPN, que podemos señalar y que Peru requerirían la elaboración de una norma, directriz o código de prácticas del Codex, serían: Hongos referidos como alimentos para consumo humano: GANODERMA LUCIDUM (CUERPO FRUCTÍFERO), HONGO REISHI (Ganoderma Lucidum), HONGO CHAGA (Inonotus obliquus ), HONGO Turkey tail (Trametes versicolor), HONGO Cordyceps sinensis y HONGO Champiñon del sol (Agaricus subrufescens Peck), HONGO CORDYCEPS (cordyceps militaris), POLVO DE HONGO MELENA DE LEON (Hericium erinaceus), POLVO DE HONGO REISHI (Ganoderma lucidum), POLVO DE HONGO COLA DE PAVO (Coriolus versicolor o Trametes versicolor), se advierte que el Codex Alimentarius no cuenta con información para el uso de los mismos. 2. Insectos comestibles: Suri - Rhea pennata 3. Alimentos de cultivo de celula, incluir en el etiquetado. 4. Proteínas vegetales alternativas: Soya (transgénicos) - proteína de soya, isoflavonas (compuestos de estructura similar a la hormona femenina estrógeno) 5. Alimentos impresos 3D – Repositorio de países que lo desarrollan y etiquetado. Productos a base de cultivos de células - Repositorio de los países que lo desarrollan y etiquetado. 6. Alimentos encapsulados, regulación si estaría o no permitido y qué debe cumplir la cápsula de un alimento encapsulado. 7. Ashwagandha (withania somnífera) – utilizada para el estrés 8. Raíz de valeriana - Valeriana officinalis, Chuchuhuasi, Corteza de Cocobolo (Dalbergia Retusa), Cocobolo, Corteza de Clavo Huasca (Tynnanthus Panurensis), Corteza de Uña de Gato (Uncaria Tomentosa), Uña de Gato, Achiote, Curcuma (Curcuma Longa L. (Zingiberaceae), Kion Conocido Como Jenjibre. Probióticos (nombres), evaluar establecer límites para diferentes tipos de productos, líquidos, deshidratados, considerando que en el Codex Alimentarius hay información únicamente para Yogurth. Hormiga - Atta laevigata se conoce como sikisapa (en Perú y Ecuador), hormiga culona (en Colombia y Argentina), Zompopo de mayo (en América Central), Bachaco culón (en Venezuela), Akango (en Paraguay), Chicatana (en México) y Cepe culón (en Bolivia). As the need for new food sources and production systems(NFPS) is gradually increasing as an alternative to global food shortages and Republic of Korea environmental pollution, the market size of NFPS is also expected to increase rapidly. Foods using various new technologies such as synthetic biology, genetic scissors, 3D technology, and cell culture technology are being developed, and investment in related R&D is increasing worldwide. However, despite this, there is no consistent and clear standards for NFPS around the world. In addition, each country has different definitions, intake history, classification standards, and technological development status of new food sources, so the regulatory status is very different. In this context, it is difficult to proceed with the work of covering both the NFPS currently identified and systems that will emerge in the future through the existing CODEX mechanisms. Furthermore, as the production systems for each new food source sector is diverse, the risk factors to be considered in the manufacturing process are more extensive depending on the manufacturing and processing technology. As technology advances and various NFPS are developed, consumer confusion and safety questions will increase. In order to prevent such international confusion, CODEX needs to develop an international standard that considers all the risk factors of various production processes of new food sources. In particular, since NFPS have a wide range of related fields and there is no clear definition regulation and classification standard, definition, classification criteria, scope, nutritional aspects, essential composition and quality factors, etc. should be discussed in NFPS Committee, as with the currently active commodity committees such as CCSCH, CCFFP, CCFFV, CCFO. If matters on labelling, residues of veterinary drugs, food additives, etc. are referred to the general subject committee for discussion, unnecessary time is wasted in determining the relevant

committee, and all risk factors that require discussion could be considered without blind spots.

For example, in the case of edible insects, comprehensive standards and specifications including the definition of edible insects, types and range of edible insects that can be used, guidelines for facilities and equipment for breeding, producing, processing, and storing edible insects,

guidelines for production and hygiene management, standard for pesticide residues and veterinary drugs, and standard for manufacturing processes and storage methods to prevent rancidity is very needed to ensure the food safety. Among them, the definition of edible insects, types and range of edible insects that can be used, and guidelines for facilities and equipment for breeding, producing, processing, and storing edible insects are needed to be developed by committees on new food sources, not existing CODEX mechanisms.  And for 3D printed foods, which is being actively developed currently, the scope of recognition of raw materials for 3D printed ink, foreign substances resulting from contact between the device inside the printer and food, damage to product quality caused by mixing cartridge materials, setting the shelf-life of cartridge materials, etc. are the subject that is difficult to deal with in existing committees.  For cell-based foods with high market growth potential, it is necessary to develop criteria for disease infection and contamination with pathogenic microorganisms in the carcass of the organism of origin, and standards for residues such as antibiotics, hormones, and pesticides. And also standards for comparing and analyzing the equivalence of genomes, proteomes, and metabolities between cells of origin and cultured cells for each manufacturing process and management guidelines for risk factors(including allergen) that may occur when genetic differences exist are matters that should be developed by committees on new food sources. This is one of the guidelines that must be developed to ensure the safety of cell based foods, and since it is a task that requires expertise and systematicity, it could be possible to respond through the establishment of responsible committee.  In order to proceed with such a vast amount of work related to new food sources, it is reasonable to discuss in a new committee. Some other Codex members also agree that it is difficult to respond to NFPS with the existing m	
The Kingdom of Saudi Arabia would like to thank the Codex Secretariat for the opportunity to comment on the circular letter (CL) on possible issues related to standard setting for new food sources and production systems (NFPS).  The Kingdom of Saudi Arabia believes that the existing mechanisms and procedures for standard setting within Codex are sufficient to address and develop any new work proposals on NFPS. In addition, focus is placed on general or horizontal standards that apply to all foods under the Codex framework. As a result, these specified food topics will already be bound by current Codex standards and work by the relevant Committees. With that being said, there is a need to develop new work related to several aspects that were not necessarily covered in previous Codex work such as the labeling of these products, quality issues, nutrition related concerns, and MRLs in the case of edible insects. Thus, general guidance particularly in terms of safety evaluation, definition, scope, food additives and labelling would be of great benefit.	Saudi Arabia
Singapore views that several topics in the context of NFPS would require the development of Codex standards, guidelines or codes of practice. Based on current developments in the industry, Singapore views that the foods derived from NFPS urgently requiring Codex's attention include substances derived from modern techniques used in biomass or precision fermentation of microorganisms, cultivated meat, plant-based protein alternatives, and insect cultivation. Microalgae, macroalgae, 3D-printed foods, nanotechnology-derived substances and other types of NFPS should also be included in the future as these sectors develop further. The topics are:	Singapore
1. Risk analysis of food products derived from NFPS. Risk analysis guidelines should be elaborated for NFPS. The guidelines would need to encompass science-based risk assessment criteria. The criteria would cut across multiple disciplines (e.g. Food science and engineering, Nutrition, Bioinformatics, Epidemiology, Public health, Toxicology, Microbiology), as well as involve expertise to address risks presented by substances and/or processes not previously used in food production (e.g. bacterial, fungal, plant and insect species with no history of safe consumption, growth factors, hormones, process of cell culture).	
2. Risk prioritization of food products derived from NFPS. It is foreseen that Codex will need to establish work priorities across different aspects of NFPS to tackle the food safety risks related to non-food grade materials, antimicrobials, pathogens, microbial toxins, food	

allergenicity, heavy metal contamination, unintended metabolites, and new toxicity end-points which are known to possibly occur in some forms of NFPS production.	
3. Harmonisation of terminologies for food products derived from NFPS. Drawing from Singapore's experience in developing regulations for some examples of NFPS, it is apparent that there is currently no international agreement on the terminologies for several examples of NFPS (e.g. cultivated meat, and foods derived from biomass fermentation, precision fermentation and insect cultivation). This could lead to differences in how different Codex Members scope their national legislation to regulate such types of NFPS. For example, some Codex Members may have developed specific, self-contained conditions to regulate cultivated meat products, while others may have layered on existing conditions for 'processed food' or 'meat products' to regulate such products. This heterogeneity in the understanding of NFPS could introduce unnecessary barriers in the international trade of such products. It could also lead to challenges in the provision of data related to food products derived from NFPS should there be a need for international scientific expert committees (e.g. JECFA, JEMRA, JEMNU, JMPR) to perform risk assessments on such food products.	
4. Good practices for the storage, transport and production of food products derived from NFPS.  Some forms of NFPS, especially the production of cultivated meat and insects as alternative proteins, involve inputs and processes that have not been considered in any existing guidelines, standards and codes of practice. For example, the production of cultivated meat, or substances from precision or biomass fermentation may require a consideration of suitable aseptic conditions (through Good Cell Culture Practices (GCCP) or otherwise), as well as adequate measures to prevent chemical cross-contamination of new and existing food allergens. Meanwhile, insect cultivation may require that the facility adopts a fit-for-purpose Hazard Analysis Critical Control Point (HACCP) or Food Safety Management System (FSMS).	
Currently, there are no standardised HACCP, Good Manufacturing Practice (GMP), GCCP or FSMS guidelines that cover such types of food products derived from NFPS. Therefore, the elaboration of Codex guidelines, standards and codes of practice on this matter would guide the industry in this sector as they plan, design and build such facilities. It would also help national competent authorities to establish clear conditions in their legislation to regulate such facilities and ensure that these conditions are aligned with international standards.	
As the NFPS space continues to grow rapidly, the development of all these Codex guidance would be necessary to enhance Codex's efforts to protect consumer health, while facilitating the trade of food products derived from NFPS globally. Singapore is of the view that Codex guidance on these topics cannot be efficiently developed using the current Codex standard-setting structure and procedures, for reasons which will be elaborated in our response to question (b).	
Uruguay entiende que la estructura actual y procedimientos establecidos en el Manual son suficientes para la elaboración de las normas de alimentos, incluidos los FASPN. De ser necesario, se podría realizar capacitaciones virtuales sobre los procedimientos establecidos en Codex para la presentación de nuevos trabajos, de forma que estos estén claros para todos los miembros.	Uruguay
The United States is unaware of any specific topics or proposals for new work that cannot be developed using the current Codex standard-setting structure and procedures.	USA
EUVEPRO believes that the existing Codex Committee on Vegetable Proteins (CCVP) is the appropriate mechanism to address emerging plant-based protein ingredients, such as those obtained from pulses (e.g., pea, chickpea, lentils), potatoes and rice. In general, any assessment of the need for new work and/or revisions should be assessed by the relevant Codex Committee for the standards and guidelines within their scope. Each Committee could then report back to the Codex Alimentarius Committee.	European Vegetable Protein Association

The global demand for protein is changing, creating opportunities for alternative sources of protein such as products that are produced via cellular agriculture. As the global demand for protein grows, many in the food sector are looking into opportunities to diversify the sources of protein that are made available to consumers that can be both environmentally sustainable and nutritionally sound.	Food Industry Asia
The commercial landscape for cell-based food is expanding rapidly. As such foods are becoming a reality, national food safety authorities need to be prepared to regulate them and authorise them for use by food business operators.	
In light of this, FIA would like to highlight the following topic, which is not covered within the scope of current Codex committees: Guidance on Approval of New Ingredients and New Technologies. This topic should encompass technologies such as cellular agriculture (tissue engineering & precision fermentation) as well as include new ingredients which are produced using such technologies.	
To develop such guidance, which may be used by member countries when evaluating new technology or new ingredients developed by the aforementioned technologies, experts from multiple disciplines are needed; this unfortunately is not within the terms of reference of current Codex subsidiary committees.	
The International Dairy Federation is not aware of any NFPS topics which need special attention or a new structure or body within the Codex system as it appears that any issues can be dealt with, in the current Codex operational structure.	IDF/FIL
Should the Commission conclude at any time that the current Codex structure is not sufficient to address identified standardization and/or determine that a new structure or body within the Commission is needed despite the above stated IDF position, we reiterate the importance that the terms of reference of any new work or structure reflect the existence of and not undermine existing Codex texts. In particular, the Codex General Standard on the Use of Dairy Terms (GSUDT) (CXS 206-1999) offers important guidance on the use of dairy terms in relation to foods offered to consumers or for further processing. The GSUDT ensures fair practices in trade and protects public health by preventing consumers from being misled about the nutritional attributes of the foods they consume. The GSUDT has served as an important Codex reference text since 1999 and only increases in value as the global marketplace becomes more crowded with non-dairy products seeking to mimic dairy products in order to take advantage of the positive consumer perception, known nutritional value and strong market position of milk-based dairy products.	
(b) Please outline the challenges/inadequacies that in your view are hampering the current system from addressing the identified specipossible approaches to address these.	cific NFPS topics, and
Australia's view is that existing Codex procedures and structures provide the necessary mechanisms to assess whether new work should be undertaken in Codex on issues related to new foods and production systems, including what scientific advice would be necessary for the new work.	Australia
Brazil is of the opinion that proposals on NFPS should be prioritized and that the safety of NFPS should constitute the foremost concern for Codex Alimentarius. Guidance on risk analysis of selected NFPS could be addressed by Ad hoc Codex Intergovernmental Task Forces. Specific concerns related to safety, hygiene, nutrition, and labelling could be addressed by Codex General Subject Committees.	Brazil
Canada is of the view that the current system can address the identified specific NFPS topics. We note that general Codex texts on food hygiene, labelling, contaminants, etc. are written to apply to all foods, regardless of the source of the food or how it is produced. The mechanism or method of production of a food is not the defining feature on whether a Codex standard is needed. Commodity standards are not needed for every type of food, rather it is recognized that a Codex standard is required to protect consumer health and promote fair trade practices. Currently, Canada believes that, in the absence of a specific NFPS topic that requires a Codex standard, guideline or code of	Canada

practice, it is premature to create a new mechanism to address specific NFPS topics. We note the CCEXEC is tasked to assist in Codex work management, and may currently be best placed to discuss potential approaches to address specific NFPS topics before consideration at CAC.	
Desafíos  * Conocimiento del estado de la técnica  * Aplicabilidad: Construir una norma para alimentos que serán producidos y comercializados por países en especifico, particularmente teniendo en cuenta que países desarrollaron la tecnología y cuales están en la capacidad de adquirir estos alimentos.  * Preferencias de consumo, por ejemplo: aspectos sensoriales.  * En algunos casos los países requerirían un nuevo marco reglamentario para el ingreso de productos derivados de las FASPN al mercado.	Colombia
Actualmente no identificamos deficiencias.	Costa Rica
Se considera que las FASPN, al no tener un alcance definido y por el contrario tener un enfoque muy amplio y general, puede dar cabida a desafíos importantes como la falta de equipamiento tecnológico para la determinación de datos lo que impediría contar con respaldos suficientes para emprender nuevos trabajos.  No se desconoce las oportunidades y ciertas ventajas que pueden llegar a brindar las FASPN, sin embargo, es importante prestar especial atención a las posibles repercusiones sobre la promoción de alimentos altamente procesados, el uso excesivo de aditivos y el aumento de la necesidad de materias de embalaje, enfoque importante para su abordaje cuando se habla de nuevas tecnologías.	Ecuador
<ul> <li>Some food beliefs and practices are religion-based. Consumers are connected to their religious and ethnic groups through food patterns, distinct dietary preferences, and prohibitions. Most religions have specific restrictions of consuming some types of foods. Globally, an understanding of the religious and cultural aspects of food is key to defining, classifying, labelling, and the production system to avoid impediments to addressing and identifying new food sources.</li> <li>Lack of knowledge about new agriculture approaches and its applications. Globally, traditional agriculture systems are more preferred due to its feasibility and lower cost. Proper introducing of new aquaculture production systems skill and knowledge is required.</li> </ul>	Egypt
The EU and its Member States will provide a reply to this question at a later stage.	European Union
<ul> <li>Quality and safety specifications of NPFS are required for National Food Control Systems.</li> <li>Code of hygienic practices for production of NFPS are required</li> <li>Labelling NFPS</li> <li>MRLs or TDIs setting after risk assessment</li> </ul>	Iran
Comment Currently, cell-based foods and ingredients produced thereof are considered a new technology and new ingredient across the globe and must be submitted to national authorities before being introduced in the market. The novelty of these products and their process is giving rise to various safety questions some unique to the technology and end products. Due to the complex and novel production process, all the different stages generate different risks. Some key safety concerns: Food hygiene, tissue biopsy, cell banking, possible harmful by-products, storage, allergenicity, product stability, and scaling of production.  Therefore, to enable innovation and to address this emerging technology, enable decision-making at the national level, and foster harmonization, the Codex Alimentarius Commission must develop guidance on how to evaluate this new technology and the ingredients produced thereof from this technology.  The new food sources do not fall under the currently established Codex Subsidiary bodies as outlined in their ToRs.  Secondly, some of the new food sources may not fit within the current Codex Food categories e.g. meat alternatives, and plant-based protein alternatives.	Kenya

Rationale Taking into consideration the dual Codex mandate objective and Codex's 2020-2025 Strategic Plan, especially Goals 1 which states that — "Address current, emerging and critical issues in a timely manner", there is urgent need for Codex Alimentarius Commission to develop a guidance on the proposed topic.  Kenya proposes that Codex Alimentarius Commission (CAC) can take either of the below two approaches:  Establishing Ad Hoc Intergovernmental Task Force to work on this agenda: As in past, CAC has established task force on Antimicrobial Resistance - (TFAMR) or Food Derived from Biotechnology (TFFBT) etc, CAC may establish an ad hoc intergovernmental task force to do the work on this agenda. Depending upon the output of this task force and if there will be need for any further work, review can be made for either establishing new Codex committee or reviewing the terms of reference of existing Codex Committee.  Establish Working Group (WG) under Codex Alimentarius Commission: CAC may establish WG under its leadership to work on this agenda. This will enable that this WG will not be restricted within the terms of reference of individual Codex Committee and also experts from multiple disciplines can join such working group to enable the development of this proposed Codex guidelines.	
In response to global challenges such as climate change and sustainability, Codex has been called upon to clarify the boundaries of its existing Committees.  To avoid hampering the system in progressing NFPS, we support the approach of first exploring whether the Committee could clarify/extend its scope/TOR for a NFPS if it is not sufficiently clear to the relevant committee.	New Zealand
En el marco de una de las esferas propuestas para las FASPN: "alimentos de origen vegetal, animal y microbiano que formaban parte de la dieta tradicional en algunos países, pero que todavía no se consumían de forma generalizada en otras partes", el aporte que podrían hacer los países, entre ellos el Perú es identificar (investigación coordinada con la academia) aquellos alimentos que forman parte de la dieta tradicional de diferentes regiones y etnias dentro de un país, que aún no se consumen de forma generalizada. Esto implica tener en cuenta que este tipo de dietas se asocia a los recursos propios de dichas regiones o zonas y a las formas de consumo, que dificulta su generalización. Con esa información realizar un repositorio para compartir entre los países.	Peru
CODEX develops standards for foods actively traded in the international market with the goal of protecting consumers' health and ensuring fair international trade. Therefore, according to the Criteria for the Establishment of Work Priorities used when considering new work proposals, volume of production and consumption in individual countries, trade volume between countries, and the number of commodities which would need separate standards are required to be submitted.  However, in the case of NFPS, there are status of research and developments that have not been closely figured out and unidentified technologies and dietary habits by country. Also, few new foods are traded internationally. As such, although commodities are not actively traded at present, work that requires preemptive and urgent development of international standards will continue to occur, so the establishment of mechanism that can respond to this is very needed.  For example, cell-based food, which have a small current trade volume but have great market growth potential and have many risk factors that must be considered to ensure consumer safety, there are many hazard factors including cell-donor animal disease infection, allergy evaluation, additives safety evaluation method, etc, that need to be considered to ensure safety. Including this case, issues that require the development of CODEX standard in advance in line with the growth of the international market will continue to arise indefinitely. Furthermore, since the current trends in scientific and technological development and food experiences of new food sources vary greatly by country, it is essential to establish and operate a solid foundation and continuous system through toxicity and nutritional evaluation.  Therefore, Korea would like to propose the establishment of the Ad hoc Intergovernmental Task Force or committee to preemptively respond to the safety management of new food sources.	Republic of Korea
The Kingdom of Saudi Arabia would like to outline the challenges the might have hindered the current system from addressing the identified specific NFPS topics as follows:  •Lack of a clear and unified definition among country members regarding NFPS.	Saudi Arabia

- •Lack of history of consumption of certain new food sources.
- •Insufficient scientific studies/data on the specified NFPS topics.
- •Assessing and managing the types of risks including, but not limited to, toxicological, microbiological, nutritional, and allergens that may require an extensive risk assessment to ensure the safety of the final product for the consumer.
- •The difference in the legislative system among country members, as some countries obtain a general standard on novel food products and production systems, while others depend on case-by-case scenarios. In addition, some countries differentiate between the novelty of a production system and the final novel product when setting a standard. Having said that, technologies and resources that are employed to create new foods may not necessarily by themselves be new and/or may not necessarily produce a new food.

# Topic 1 – Risk analysis of food products derived from NFPS

In order for NFPS matters to be considered in an integrated and holistic manner, a range of relevant expertise is required. For example, to develop standards on the appropriate use of cell-lines, certain bacterial, fungal, plant or insect species as food ingredients requires a wideranging discussion covering many issues including the mitigation of new or elevated allergenicity or toxicity risks, the acceptable use of non-food grade, pharmaceutical grade, antimicrobial or even small molecules in the production media, potential genetic drifts and genome instabilities, as well as possible anti-nutrient effects associated with some production inputs. A comprehensive consideration of all these factors, that is not scoped to a particular Codex committee, is required for Codex to recommend appropriate standards, guidelines and codes of practice to manage these risks.

Singapore would like to recall the report of the CAC33 (ALINORM 10/33/REP) where the grouping of expertise through the ad hoc intergovernmental task force on animal feeding allowed for more efficient progress on the subject. We would also like to recall the discussions from the CCEXEC46 report (ALINORM 99/4), where the ad hoc inter-governmental task force on foods derived from biotechnology was established to (i) elaborate standards, guidelines or recommendations considering existing risk analysis principles, and (ii) to coordinate and closely collaborate with appropriate Codex Committees on such foods. We envisage that similar benefits could be reaped for foods derived from NFPS if an ad hoc inter-governmental task force on NFPS is set up.

#### Topic 2 – Risk prioritization of food products derived from NFPS

Under the existing Codex standard-setting structures and procedures, the prioritization and establishment of work priorities across such a variety of areas would be challenging because work is prioritized and established by individual Codex Committees. Without a centralized platform for the prioritization of work related to NFPS, the discussion on topics specifically relating to NFPS could be diluted among other work priorities within the individual Codex committees. On the other hand, a centralized platform could begin work immediately. We note that NFPS-related discussions have already begun to emerge in some Codex subsidiary bodies, as well as on platforms outside of Codex. For example, CCNFSDU43 called for discussions around the proposed new work on Guidelines, including General Principles, for the Nutritional Composition of foods and beverages made from plant-based and other alternative protein sources, which would potentially cover foods and beverages containing substances derived from NFPS. FAO has also released a publication entitled 'Food Safety Aspects of Cell-based Food' which focuses on cultivated meat, which is an example of foods derived from NFPS.

# Topic 3 -- Harmonisation of terminologies for food products derived from NFPS

Under the existing Codex structure, the elaboration of a Codex standard to harmonise terminologies for a particular food commodity would be most appropriately undertaken by the relevant Codex commodity committee. For example, in the dairy sector, work led by the Codex Committee for Milk and Milk Products resulted in the establishment of CXS 206-1999 "General Standard for the Use of Dairy Terms". Codex standards on a food commodity have also been established by a relevant Codex Regional Committee if the commodity is of interest only to a particular region. One example is CXS 40R-1981 "Regional Standard for Chanterelles", which was elaborated by CCEURO.

### **Singapore**

Food products derived from NFPS are traded globally and not limited to a particular region. There is no apparent Codex commodity committee of a similar nature for NFPS under the existing Codex structure and mechanism. This further supports the call to establish an ad hoc intergovernmental task force for NFPS, which can lead in work on NFPS, both horizontally and vertically.

The task force could also provide a singular point of coordination across other Codex committees should there be a need to tap on their inputs in the development of these standards. For example, the task force would be a platform for CCFICS to provide their views on the terminology's implications on the import and export of food products derived from NFPS, or for international scientific expert committees (e.g. JECFA, JEMNU, JEMRA, JMPR) to weigh in on the terminology's usefulness in helping them collect relevant and comprehensive data on NFPS for risk assessments.

Topic 4 -- Good practices for the storage, transport and production of food products derived from NFPS For Codex to develop standards, guidelines and codes of practice for the management of NFPS facilities, Codex would need to consider issues that span across various general subjects of food safety concern.

For example, if Codex were to develop a code of practice to implement HACCP or GMP principles for the production of cultivated meat, or substances derived from precision or biomass fermentation, expertise would be needed from food hygiene (to address microbiological risks), veterinary and drug residues (to consider the appropriate use of antimicrobials), cell biology (to consider the appropriate conditions for the storage and transport of cell banks, bacterial, fungal or insect species) and food allergenicity (to determine how tools, equipment and the production environments should be designed with adequate separation). A dedicated task force on NFPS would be a resource-efficient way to address this topic, because the relevant experts would already be congregated onto such a platform to address the other NFPS-related topics.

#### Conclusion

CAC45 recognised in REP22/CAC that it is important for Codex to work in a flexible and timely manner to consider NFPS as an important topic in the development of international standards aimed at protecting consumer health and ensuring fair practices in the food trade. The establishment of a cross-cutting mechanism, such as an ad hoc inter-governmental task force, is therefore warranted to overcome the challenges in the context of NFPS in a flexible and timely manner.

Singapore proposes that the ad hoc inter-governmental task force could be set up to work on NFPS under the following TORs:

- 1. To elaborate standards, guidelines, or other principles, as appropriate, for foods derived from NFPS, including but not limited to substances derived from modern techniques used in biomass or precision fermentation of microorganisms, cultivated meat, plant-based protein alternatives, and insect cultivation
- To coordinate and closely collaborate, as necessary, with appropriate Codex Committees within their mandate as it relates to foods derived from NFPS, including but not limited to substances derived from modern techniques used in biomass or precision fermentation of microorganisms, cultivated meat, plant-based protein alternatives, and insect cultivation; and
- 3. To take into account existing work carried out by national authorities, FAO, WHO, other international organizations and other relevant international fora, when carrying out its work.

Uruguay considera que, si bien podrían existir desafíos en cuanto a la información científica, existen organismos internacionales (FAO – OMS) que pueden colaborar en la investigación y generación de información, contando el Codex con los ámbitos de evaluación de información adecuados para apoyar el avance de normas cuando son necesarios (JECFA, JEMRA, etc). La deficiencia podría ser falta de presupuesto adecuado para que funcionen estos ámbitos de evaluación, necesarios para avanzar en el proceso de elaboración de normas.

Uruguay

The United States is unaware of any challenges or inadequacies that are hampering the current system from addressing specific NFPS topics. The Secretariat has been charged with developing guidance on how to apply existing procedures to ensure that Members do not perceive procedural obstacles to submitting new proposals for work in this and other areas of Codex. The United States looks forward to this guidance and hopes it will be helpful to Members.	USA
The current system is adequate in addressing issues related to plant-based protein ingredients, however the standards established by Codex in the field, such as the General Standard for Vegetable Protein Products (CXS 174-1989), were developed three decades ago and consideration could be given on whether these are still fit-for-purpose in the context of novel/emerging plant-based ingredient sources and increasingly diverse applications in foods. It would be important for operators to have appropriate analytical methods for vegetable protein products (e.g., protein content, moisture).	European Vegetable Protein Association
Currently, cellular agriculture and the foods and ingredients produce via this technology are considered to be "new" across the globe, and in turn must undergo pre-market approval processes by national authorities before being introduced into the market.	Food Industry Asia
The novelty of these products and the processes involved in producing them are spurring various safety-related questions; some unique to the technologies utilised, stages involved (varying risks) and end products. Some key safety concerns relate to: tissue biopsy, cell banking, possible harmful by-products, storage, allergenicity, product stability and scaling of production.	
In order to enable innovation and decision making at a national level, as well as to foster harmonisation, the Codex Alimentarius Commission (CAC) should develop guidance on how to evaluate this new technology and the foods/ingredients produced via it.	
Taking into consideration the dual mandate objective and Codex's 2020-2025 Strategic Plan, especially Goal 1 which states "address current, emerging and critical issues in a timely manner", Codex Alimentarius Commission should find a way to start working on this topic promptly.  FIA would like to suggest the CAC proceed with one of the following options:	
<ol> <li>Establish an ad hoc intergovernmental task force to work on this agenda</li> <li>In the past the CAC has established such a task force on e.g., Antimicrobial Resistance (TFAMR) and Food Derived from Biotechnology</li> </ol>	
(TFFBT. Depending upon the output of the suggested task force and if there will be need for any further work, a review can be undertaken to assess whether a new Codex Committee should be established or if the terms of reference of an existing Codex Committee can be revised accordingly.	
2. Establish a Working Group (WG) under the CAC The CAC could consider establishing a WG under its leadership to work on this agenda. Establishing a WG could be an effective way forward as it would not be restricted within the terms of reference of an individual Codex Committee, and furthermore experts from multiple disciplines could join; enabling the development of the proposed Codex guidelines.	
IDF is not aware of any challenges or inadequacies within the Codex system that would hamper addressing NFPS topics within the current Codex structure.	IDF/FIL
(c) In the discussions on NFPS, in your view, are there aspects relevant to standard-setting that have not yet been considered by CAC and identify what you consider to be key points.	? If yes, please elabor

No – the CCEXEC subcommittee did a very thorough job of collating and analysing a large amount of data collected from the membership which was considered by CCEXEC83. This work did not identify any issues with the existing mechanisms and CCEXEC83 recommended that CAC45 encourage Members to submit proposals related to NFPS using existing Codex mechanisms, and Codex subsidiary bodies to consider NFPS in their deliberations. CAC45 did not identify any new issues.  An annual CL process of seeking information on any specific issues is a good way of continuing to assess the sufficiency of the system as a whole. Aside from this CL process, at this stage we would suggest the general subject committees remain best placed to examine if responsibilities under their mandates are sufficient as and when specific issues are brought forward by members related to new food and production systems.  The Codex Secretariat has been tasked with preparing guidance on how to apply existing procedures to ensure that Members do not perceive procedural obstacles to submitting new proposals for work in this and other areas of Codex. Australia thinks this work will be valuable.	Australia
Brazil understands that the main aspects relevant to standard-setting have been considered by CAC. It is worth noting that the application of nanotechnology to food could be classified as a NFPS, although this was not addressed by the report of the CCEXEC subcommittee on NFPS.	Brazil
No, in the absence of a specific NFPS topic, Canada does not see that there are any further aspects to standard-setting that have not been considered by CAC at this time. The issue of dealing with "new foods" is not new in Codex, as seen in past discussions on foods produced through biotechnology. Over the decades, CAC has been able to address innovation in food products and processes through its regular Codex mechanism. CAC45 encouraged Members to submit proposals related to NFPS using existing Codex mechanisms. The Codex Secretariat has been asked to prepare practical guidance on how to apply existing procedures to ensure Members do not perceive structural obstacles to submitting proposals for new work, which Canada hopes will be helpful to Members.	Canada
Si, para iniciar estas conversaciones es necesario precisar por parte de FAO/OMS el alcance de las FASPN, así como, de las conversaciones que se deriven de ellas, información técnica relevante que permita contar con una aproximación real sobre las FASPN, que puedan ser usados como insumos para la definición de lineamientos específicos que eventualmente se requieran.	Colombia
No.  No obstante, es importante mencionar que la Comisión del Codex debe velar por la correcta aplicación de los procedimientos existentes para garantizar que los miembros no perciban obstáculos de procedimientos a la hora de presentar nuevas propuestas de trabajo y, de esta manera, en el futuro minimizar el impacto que pueda generarse por la desarmonización fundada por falta de normas que son pertinentes al ámbito el Codex.	Costa Rica
Se considera que los aspectos pertinentes para el establecimiento de normas de la Comisión del Codex Alimentarius, ya se encuentran bien establecidas y pueden ser empleadas para el direccionamiento adecuado, sin embargo, de existir la necesidad, se deberá solicitar el apoyo de los grupos de expertos y la prestación de asesoramiento científico por parte de la FAO y la OMS.	Ecuador
Yes, as addressed in point (a), the following aspects need to be considered;  1- (i) new system for nomenclature for alternative sources of proteins, (ii) good practices for the algae cultivation chain, and (iii) mitigation measures to reduce or prevent potential safety hazards that may affect consumer health.  2- More research on modern aquaculture farming practices, environmental integrity, labelling of aquaculture products, and maximum limits for cross-cutting and emerging chemical and microbial hazards.  3- Good greenhouse high-value food production Practices and technologies	Egypt
The development of standards on certain NFPS may be associated with other legitimate factors. In such situation, it would be critical that the process to address these factors is agreed before initiating the development of the standard.	European Union

Analytical methods for detecting contaminants and ensuring product safety are crucial. These methods can involve various techniques, including those related to atomic energy or standards set by organizations like the European Union. It's important to have stringent testing and quality control measures in place to ensure the safety and purity of herbal teas as they transition to more commercial and industrial production processes.	Iran
Yes. Development of standards for mentioned NFPS are necessary. For example, there is no evidences about risk assessment of using Nano- materials such as metals in foods as fortifier and its TDI.	Iran
One area related to NFPS that Codex may be able to improve on is how it develops standards for indigenous foods, which may be new to Codex but not new to the member country/ies proposing a draft standard.	New Zealand
NZ notes the importance of ancestral consumption for certain groups and the difficulties obtaining scientific backing where the data does not exist.	
The development of indigenous foods standards in Codex can be impeded by the lack of data to support draft standards. Often this includes assessment of traditional food that has been consumed safely by indigenous people for tens if not thousands of years.	
Interventions at CAC45 noted the importance of ancestral consumption for certain groups and the difficulties obtaining scientific backing where the data does not exist.	
While considering how Codex develops standards for NFPS there may be an opportunity for Codex to consider how it could better support the development of standards for indigenous food or more specifically whether there may be a more appropriate approach to incorporate the traditional knowledge of indigenous peoples into the Codex assessment of indigenous foods while still ensuring a robust scientific process.	
Some NFPS may be associated with other legitimate factors, and there is currently not a routine in place for this discussion, we consider the lack of a routine a challenge for Codex in the future.	Norway
Consideramos que siempre debe prevalecer los estudios científicos para el establecimiento de normas Codex.	Peru
First of all, it is necessary to discuss consumer perceptions of new food sources. Since each country has different religion, dietary habits, and development trends in science and technology, consumers in each country have different perceptions and awareness levels of new food sources and related technologies. In order to consumer to safely consume them in terms of safety and nutrition of new food sources and to properly recognize, the need to develop standards for NFPS is even greater.  The negative perception of foods using new technologies such as genetic recombination is widespread in society. For the cell-based food, a consumer awareness survey indicated that most consumers had a very low purchase intention due to negative perceptions of safety. To relieve the vague anxiety of consumers, it is necessary to provide information to develop the standard for NFPS. And also for the alternative protein, it includes not only foods that replace meat, but also proteins such as fish and plants, but even the concept of each term is not clearly known, making it difficult for consumers to understand the characteristics of each food. Therefore, it is necessary to investigate, analyze and reflect consumers' perceptions and knowledge levels to prevent their confusion from the early stages before developing CODEX standard. Also, the ethical aspect needs to be discussed. In the case of cell-based foods, ethical issues have been steadily raised on the extraction of fetal serum for cell acquisition during the production process, and there are various views on cell-based foods from a religious perspective. Recently, FAO and WHO published related documents after a complex evaluation and analysis process of terms in consideration of consumer perception and ethical aspects of cell-based foods. We believe that CODEX also needs transparent and comprehensive discussions to reflect consumer awareness and ethical issues.	Republic of Korea

The Kingdom of Saudi Arabia encourages the committee to highlighted in previous responses and meetings. In addition, taken into account to move forward with this work:  •Develop a clear and unified definition for the term "new food develop such definitions.  •Identify and divide the products that have a history of consuctions consumption, and accordingly request country members to pand the history of consumption.  •Request all Codex Committees to review and determine who need to be amended to meet these "new foods". Then, the Codex Committee outlining their conclusions including clear developing new work in this field).	the Kingdom of Saudi d" and the specified NF umption in some countr provide the available in nether any Codex stand Codex Alimentarius Col	Arabia deems appropriate the following proposals to be PS topics. An EWG or a task force can be established to ries from those new products that do not obtain a history of formation on these food sources, the regulatory framework dards, guidelines, or codes of practice under their purview mmission should be asked to receive reports from each	
Topics 3 and 4 have yet to be considered by CAC. These to	pics have been elabora	ated in our response under (a) and (b).	Singapore
Uruguay no encuentra aspectos que no se hayan examinad	lo y sean necesarios co	onsiderar.	Uruguay
The United States is not aware of any aspects relevant to stabove, the guidance being prepared by the Secretariat should new work.			USA
In the context of NFPS, there are certain aspects of standard Codex, however, as of yet no such work has been initiated. products to the commercialised market. Codex guidelines or misled. Furthermore, harmonisation regarding the approach	The adoption of consis n the labelling of NFPS	tent nomenclature is crucial in terms of bringing such would help ensure consumers are well informed and not	Food Industry Asia
IDF is not aware of any aspects relevant to standard setting Procedures.	for "new foods" that ca	nnot be addressed within the current Codex structure and	IDF/FIL
(d) Are you planning to propose any topics related to NF potential route by which you may submit the proposal(s			ate the topic(s) and the
None have been identified for the immediate future.			Australia
No. Brazil is not planning to propose any topics related to NI	FPS for consideration I	by Codex in short to medium term.	Brazil
Not at this time			Canada
No			Colombia
A la fecha el sector productivo no ha manifestado la necesio	dad de alguna norma re	elacionada con FASPN.	Costa Rica
Se considera que conforme se vayan profundizando los deb posibilidad de proponer o apoyar algún tema específico de o			Ecuador
Topic	Duration	Potential Route	Egypt
Alternative sources of proteins	Short term	CCEXEC	
Aquaculture production systems Soilless farming and protective agriculture approaches	Medium term Medium term	CCEXEC CCEXEC	

The EU and its Member States do not currently have proposals related to NFPS. This does however not exclude the submission of proposals in the coming years that would be based on the EU experience in the area. Should these proposals for falled the remit of a Committee, the EUNS would submit these proposals directly to the Commission. The EUMS note that it would be beneficial for the membership to have more clarify on how work NFPS proposals would be considered by the CAC.  At the moment no, but in future after doing preliminary studies, may propose the related topic.  In February 2023, Codex Committee of North America and the South West Pacific (CCNASWP16) agreed indigenous foods was as an issue of relevance that should be added to a list of key emerging issues expected to have an impact on food safety in the region in the next 5-10 years.  It was recognised that having a Codex standard for such foods, that addresses food safety concerns while facilitating trade, could also have benefits in addressing lood security concerns that are important to the region.  CCNASWP16 also had an engaged discussion on new work proposals and identified breadfruit flour, Galip nut, and fish and fishery products as three possible topics for regional standards development.  Samac oftend to lead the development of a siduscussion paper on breadfruit flour. Such a discussion paper could be prepared or consideration by CCNASWP17 tentarityly scheduled for 2024.  We are not in a situation to propose new work, however we would support new work on seaweed, which is a commodity that, albeit not being round to be prepared or consideration of codex standard nor guideline specifically addressing lood safety in seaweed. Furthermore, to our knowledge global standards are generally lacking for seaweed. We would like to refer to the Report of the expert meeting on food safety for seaweed – Current status and future perspectives (fao.org) "Despite the current global trade in seaweed." Furthermore, to our knowledge global standards are generally lac		
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In the short term, guidelines for definition, classification criteria, and cataloging of NFPS are required. Once NFPS database is established after such work, the development of standards or guidelines for risk analysis and safety evaluation will be carried out efficiently in the long run. Specifically, for the cell-based foods, which are expected to grow rapidly with active international research, guidelines for cell-based foods by production technology and guidelines for the use of cell-based food terminology are first needed.  Due to the nature of rapid development and change of new food sources, the gap between national awareness and technology level will grow over time. Therefore, we believe that the best way is to establish a separate committee to build-up a consistent and professional framework from the early stage of standard development. Otherwise, it will take a long time to decide which committee will have jurisdiction on each agenda to discuss the definition and scope of NFPS that are difficult to define, and to set the boundary of discussion. In order to respond quickly to the vast and rapidly changing characteristics of new food sources and to prevent blind spots in safety management, the establishment of Ad hoc Intergovernmental Task Force or committee dedicated only to NFPS would be suitable to discuss the above topics.  At the moment, the Kingdom of Saudi Arabia has no project plans related to NFPS for consideration by Codex. Nevertheless, we are pleased and fully prepared to contribute in any new work related to NFPS in the mere future.  Singapore will be developing the topics described in (a) further, in preparation for submission to Codex for consideration. Singapore plans to submit the proposals via CCEXEC, or the ad hoc inter-governmental task force on NFPS should this structure be established by Codex.  Uruguay no tiene previsto proponer tema alguno relacionado con las FASPN  Uruguay  The United States worked with Canada to prepare a discussion paper on consideration of work to develop Gu	"new" to some members, still would need new work in Codex. The production of seaweed is significantly high globally, however there is no Codex standard nor guideline specifically addressing food safety in seaweed. Furthermore, to our knowledge global standards are generally lacking for seaweed. We would like to refer to the Report of the expert meeting on food safety for seaweed – Current status and future perspectives (fao.org) "Despite the current global trade in seaweed – and its projected increased utilization to support food security – there is	Norway
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The United States worked with Canada to prepare a discussion paper on consideration of work to develop Guidelines including General  USA		Singapore
	Uruguay no tiene previsto proponer tema alguno relacionado con las FASPN	Uruguay
	The United States worked with Canada to prepare a discussion paper on consideration of work to develop Guidelines including General Principles for the Nutritional Composition of Foods and Beverages made from Plant-based and other Alternative Protein Sources. The paper	USA

was discussed at the 43rd Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU43, March 2023). The Committee agreed to continue its consideration of this topic based on a refined discussion paper at the next session.  The United States is also considering submitting a discussion paper related to food contact material, specifically with respect to food safety considerations related to use of recycled packaging materials. One way forward could be review of the issue by a Working Group of the CAC. This approach may provide an example for how NFPS could be handled in the future.  EUVEPRO is not planning to propose any topics related to plant-based protein alternatives or other NFSP for consideration by Codex and would advise against the development of general Codex principles for the nutritional composition of foods and beverages made from plant-based and other alternative protein sources, as currently being considered by CCNFSDU. The plant-based food category currently lacks a universally accepted definition, which will be outlined in the ISO standard for plant-based foods to be published in 2024. It is also important to note that the composition and attributes of animal-derived products to which plant-based foods are commonly compared are not standardised. In general, these foods are not intended to be nutritionally equivalent in terms of advantageous or disadvantageous nutrients, therefore aiming for nutritional equivalence would be inappropriate. They each have their place in a balanced diet and premature guidelines risk hindering the innovation and development of new and diverse plant-based products that meet the varied needs and preferences of consumers in a sustainable way.	European Vegetable Protein Association
Please see the inputs provided in response to questions a) to c).	Food Industry Asia
At this time IDF is not planning to propose any topics related to NFPS but reserves the right to any opportunity to engage and comment on topics proposed by CODEX members or other NGOs.	IDF/FIL