

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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

Agenda Item 5

CAC48/CRD35

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-eighth Session

Rome, Italy

10-14 November 2025

COMMENTS OF SINGAPORE

AGENDA ITEM 5

CX/CAC 25/48/10

Proposal on the development of principles for the risk analysis of new food sources and production systems (NFPS)

Singapore appreciates the EU for the proposal on risk analysis of NFPS. The proposal is very ambitious considering its broad scope. Given the vast variety of NFPS, developing comprehensive risk analysis principles applicable to different types of NFPS presents significant challenges and resource implications from Codex. Conversely, generic guidance that is too broad may lack the specificity needed to provide meaningful direction to regulatory authorities. This raises important concerns about the resource allocation and the most appropriate approach to ensure both effectiveness and efficiency if this new work is to be undertaken.

Secondly, EU's proposal should not impede or delay ongoing NFPS work in other Codex committees. Singapore views the EU's proposal as one of several important NFPS initiatives, alongside proposals from other countries in their respective areas. Each proposal addresses different but equally important aspects of NFPS. These complementary efforts across multiple work streams will collectively position Codex at the forefront of providing comprehensive and timely guidance on NFPS as an emerging global issue.

Thirdly, Singapore noted that EU's proposal listed ethical concerns as one of the legitimate factors to be considered. Singapore is concerned that this is going beyond the mandate of Codex. The proposal's scope should focus strictly on food safety within Codex's mandates and should not extend to areas such as ethical issues that fall outside Codex's remit. As with other Codex standards, the guidance should be trade facilitative, whilst promoting consumer protection.

Fourthly, NFPS holds promise to contribute to food security and feed our people. Given that NFPS represents an innovative and rapidly evolving sector, particular attention should be paid to ensuring that any risk analysis framework does not create barriers that could stifle food innovation. The principles should provide clear, science-based guidance that enables regulatory authorities to assess NFPS appropriately whilst allowing for the continued development of new food technologies.

Lastly, EU should consider conducting a gap analysis of current Codex texts to identify areas that require strengthening before proposing specific NFPS requirements. This is especially so as a food that is new to some regions may not be new to other regions. This would represent a more resource-efficient approach, avoiding unnecessary duplication.