КОМИССИЯ КОДЕКС АЛИМЕНТАРИУС **R**

Продовольственная и сельскохозяйственная организация Объединенных Наций

Всемирная организация здравоохранения

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Пункт 5 повестки дня **CX/CAC 25/48/10**

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СОВМЕСТНАЯ ПРОГРАММА ФАО/ВОЗ ПО СТАНДАРТАМ НА ПИЩЕВЫЕ ПРОДУКТЫ

КОМИССИЯ "КОДЕКС АЛИМЕНТАРИУС"

Сорок восьмая сессия

Штаб-квартира ФАО, Рим, Италия

10–14 ноября 2025 года

ПРЕДЛОЖЕНИЯ О НОВОЙ РАБОТЕ

A. Предложения о новой работе, представленные действующими вспомогательными органами на утверждение 48-й сессии Комиссии "Кодекс Алиментариус"

1. В настоящем документе перечислены предложения о новой работе, выносимые на утверждение 48-й сессии Комиссии "Кодекс Алиментариус" действующими вспомогательными органами, сессии которых состоялись в период после 47-й сессии Комиссии, а также предложения о новой работе, полученные Секретариатом Кодекса после 47-й сессии Комиссии и не относящиеся к сфере ведения ни одного из действующих комитетов. Этот сводный документ призван дать общее представление о предлагаемых направлениях новой работы и послужить основой для работы Комиссии по рассмотрению предложений о новой работе.

2. Исполнительный комитет Комиссии "Кодекс Алиментариус" на своей 88-й сессии рассмотрел предложения о новой работе, представленные комитетами, сессии которых состоялись в период с января по май 2025 года (предложения 1-7 в таблице 1), а на своей 89-й сессии Исполнительный комитет рассмотрит предложения о новой работе, представленные комитетами, сессии которых состоялись в период с июня по октябрь 2025 года (предложения 8-12 в таблице 1), а также два предложения о новой работе, представленные одним из членов (таблица 2).

3. Со всеми предложениями о новой работе можно ознакомиться здесь на английском, испанском и французском языках.

4. В таблице 1 перечислены все предложения о новой работе, представленные действующими вспомогательными органами Кодекса после 47-й сессии Комиссии, с указанием ссылок на соответствующие документы, в том числе проектные.

5. В число двенадцати предложений о новой работе, представляемых вспомогательными органами Кодекса на рассмотрение Комиссии на ее 48-й сессии, входят предложения по следующим вопросам: новые положения о пищевых добавках, три региональных стандарта, два товарных стандарта, пересмотр двух сводов норм и правил, один новый свод норм и правил и преобразование одного регионального стандарта в международный, а также два приоритетных списка для оценки соответствующими комитетами экспертов.

B. Предложения о новой работе, не относящиеся к сфере ведения действующих вспомогательных органов

6. В таблице 2 приведены два предложения о новой работе, представленные непосредственно в Секретариат Кодекса, поскольку они не относятся к сфере ведения ни одного из действующих вспомогательных органов Кодекса.

Предложение о разработке стандарта на пастеризованное верблюжье молоко

7. На 47-й сессии Комиссии (2024 год) в рамках пункта повестки дня "Разное" Объединенные Арабские Эмираты (ОАЭ) представили дискуссионный документ и предложение о новой работе по подготовке товарного стандарта на верблюжье молоко[1].

[1] CAC47/CRD03

8. Члены положительно восприняли предложение ОАЭ, сочли его своевременным и отражающим рост объемов производства и продаж верблюжьего молока и производимых из него продуктов и подчеркнули необходимость в надлежащие сроки приступить к работе по данному направлению с соблюдением установленных процедур и практики.

9. Принимая во внимание заключение 87-й сессии Исполнительного комитета относительно того, что, "если 47-я сессия Комиссии примет решение рассмотреть предложение о дальнейшей работе в отношении верблюжьего молока, следует рассмотреть возможность рассылки циркулярного письма (ЦП), в котором членам и наблюдателям будет предложено высказать свои мнения о необходимости и возможном объеме любой новой работы в отношении верблюжьего молока"[2], а также представленные Секретариатом Кодекса предложения процедурного характера и поддержку, предложенную секретариатом принимающей страны Комитета Кодекса по молоку и молочным продуктам (CCMMP), Комиссия согласовала подход, который предусматривал пересмотр и изменение проектного документа, а также направление членам и наблюдателям ЦП (CL 2025/50-CAC) с просьбой представить замечания[3].

10. Комиссия далее отметила, что в ЦП заинтересованным членам и наблюдателям могло бы быть предложено высказать свои мнения о необходимости и возможном объеме новой работы в отношении верблюжьего молока с учетом того, что предложение по верблюжьему молоку будет представлено на рассмотрение 89-й сессии Исполнительного комитета в рамках критического обзора и Комиссии на ее 48-й сессии.

11. В августе 2025 года членам и наблюдателям было выслано ЦП 2025/50-CAC с просьбой представить замечания по предложению о разработке стандарта на пастеризованное верблюжье молоко. В Приложении I к ЦП было представлено предложение, которое было доработано с целью включения дополнительной информации о необходимости и характере стандарта (стандартов) Кодекса на товары из верблюжьего молока и с учетом того, какая информация требуется Исполнительному комитету при проведении критического обзора предложений о новой работе. Кроме того, в Приложении I к ЦП были описаны результаты анализа пробелов, который был проведен Новой Зеландией в качестве принимающей страны CCMMP и Международной молочной федерацией (ММФ) и касался следующих аспектов: i) существующие тексты Кодекса, касающиеся возможных проблем фальсификации и неправильной маркировки; и ii) существующие тексты Кодекса, касающиеся верблюжьего молока и производимых из него продуктов.

12. Замечания, полученные в ответ на ЦП 2025/50-CAC, приведены в Приложении I к настоящему документу. Они отражают разные мнения по вопросу о проведении новой работы: от обоснованности такой новой работы до сферы ее охвата.

13. CCNE на своей 12-й сессии отметил, что предложение начать новую работу по разработке стандарта на пастеризованное верблюжье молоко получило поддержку, и обсудил важность проведения такой работы, а также то, какие аспекты необходимо учесть при разработке этого стандарта[4].

Предложение о выработке принципов проведения анализа риска, связанного с новыми источниками и системами производства продовольствия (НИСПП)

14. Недавно Европейский союз (ЕС) представил предложение о новой работе по разработке принципов проведения анализа риска, связанного с новыми источниками и системами производства продовольствия (НИСПП).

15. Вопросы, связанные с НИСПП, обсуждались на сессиях 82-й сессии Исполнительного комитета (2021 год), 44-й сессии Комиссии (2021 год), 83-й сессии Исполнительного комитета (2022 год), 45-й сессии Комиссии (2022 год) и 46-й сессии Комиссии (2023 год). Ранее членам Кодекса были разосланы два ЦП с просьбой представить информацию по этой теме, и полученные сведения были опубликованы в рамках подготовки к 83-й сессии Исполнительного комитета[5].

16. Ссылка на дискуссионный документ и проектный документ приведена в Приложении II к настоящему документу.

C. Рекомендации

17. Комиссии на ее 48-й сессии предлагается:

i. рассмотреть предложения о новой работе в свете Стратегического плана на 2020–2025 годы, а также с учетом приведенных в Руководстве по процедуре Комиссии Критериев установления

[2] REP24/EXEC2, подпункт i) пункта 85
[3] REP24/CAC, пункт 260
[4] REP25/NE, пункты 68–71
[5] CX/EXEC 22/83/4, Приложение 2

приоритетов работы (раздел 2.3) и Критериев учреждения вспомогательных органов Комиссии "Кодекс Алиментариус" (раздел 2.2); и

ii. принять решение о целесообразности каждого предложения о новой работе с учетом результатов критического обзора, проведенного Исполнительным комитетом на его 88-й и 89-й сессиях соответственно, и определить, какому вспомогательному или иному органу следует поручить эту работу.

Таблица 1. Предложения о проведении новой работы или о пересмотре стандарта, представленные действующими вспомогательными органами

Примечание. С представленными предложениями можно ознакомиться здесь на английском, испанском и французском языках.

Номер	Комитет / внесшая предложение сторона	Предложение о новой работе	Ссылка и проектный документ
1.	CCAFRICA	Региональный стандарт на тушеную или вареную, соленую и несоленую, сушеную рыбу (Африка)	REP25/AFRICA, подпункт i) пункта 62, Приложение IV
2.	CCNASWP	Региональный стандарт на орех канариума (Северная Америка и юго-западная часть Тихого океана)	REP25/NASWP, подпункт i) пункта 83, Приложение IV
3.		Региональный стандарт на муку из плодов хлебного дерева (Северная Америка и юго-западная часть Тихого океана)	REP25/NASWP, подпункт ii) пункта 83, Приложение V
4.	CCFFV	Стандарт на свежую куркуму	REP25/FFV, подпункт i) пункта 89, Приложение VI
5.		Стандарт на свежую капусту брокколи	REP25/FFV, подпункт ii) пункта 92
6.	CCFA	Приоритетный перечень веществ, предлагаемых для оценки JECFA	REP25/FA, подпункт i) пункта 133, Приложение XI
7.		Новая работа по предлагаемому проекту положений ОСПД о пищевых добавках	REP25/FA, подпункт iv) пункта 109, Приложение IX
8.	CCCF	Пересмотр "Норм и правил по борьбе с сорными растениями в целях предотвращения и снижения загрязнения пищевых продуктов и кормов пирролизидиновыми алкалоидами" (CXC 74-2014)	REP25/CF18, подпункт ii) пункта 90, Приложение VI, часть I
9.		Пересмотр "Норм и правил снижения содержания афлатоксина B1 в сырых кормах и дополнительных пищевых веществах, предназначенных для животных молочного направления" (CXC 45□1997)	REP25/CF18, подпункт ii) пункта 102, Приложение VII
10.		Свод норм и правил по предотвращению и	REP25/CF, подпункт ii) пункта 106, Приложение VIII

Номер	Комитет / внесшая предложение сторона	Предложение о новой работе	Ссылка и проектный документ
		снижению загрязнения пищевых продуктов и кормов тропановыми алкалоидами	
11.	CCPR	Приоритетный перечень пестицидов для оценки JMPR	REP25/PR, подпункт i) пункта 279, Приложение VIII
12.	CCASIA	Преобразование "Регионального стандарта на продукты из красных водорослей" (Азия) (CXS 323R-2017) в международный	REP25/ASIA, пункт 141, Приложение VIII

Таблица 2. Предложения о проведении новой работы или о пересмотре стандарта, представленные членами

Номер	Комитет / внесшая предложение сторона	Предложение о новой работе	Ссылка и проектный документ
1.	ОАЭ	Стандарт на пастеризованное верблюжье молоко	CL 2025/50-CAC, Приложение I (часть 2)
2.	ЕС	Новая работа по выработке принципов проведения анализа риска, связанного с новыми источниками и системами производства продовольствия (НИСПП)	Приложение II к настоящему документу

ПРИЛОЖЕНИЕ I

НА ЯЗЫКЕ ОРИГИНАЛА

COMMENTS ON THE PROPOSAL FOR DEVELOPMENT OF A STANDARD FOR PASTUERIZED CAMEL MILK

BACKGROUND

1. This appendix compiles the comments on the proposal for development of a standard for pastuerised camel milk, as indicated in the relevant circular letter (CL 2025/50-CAC). The comments include those received through the Codex Online Commenting System (OCS)[6], or via email by the time this document was issued. The comments are as shown in the Annex to this Appendix.

EXPLANATORY NOTES ON THE ANNEX

2. 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 Member or Observer).

[6] OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

ДОПОЛНЕНИЕ

COMMENTS IN REPLY TO CL 2025/50-CAC

Submitted by

Australia, Costa Rica, Egypt, Indonesia, Iraq, Kazakhstan, Kenya, Mongolia, New Zealand, the United States of America (USA) and Food Industry Asia (FIA), International Dairy Federation (IDF/FIL)

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
Indonesia wishes to express its appreciation to the United Arab Emirates and the other co-author member countries for preparing the discussion paper and project document on the development of a Commodity Standard for Camel Milk. Indonesia is of the view that the documents provided are comprehensive and in accordance with the criteria set out in the Procedures for the Elaboration of Codex Standards and Related Texts. Considering the many beneficial properties and unique characteristics of camel milk, which distinguish it from other types of milk, it would be highly advantageous for Codex to proceed with the elaboration of a commodity standard for this product. However, Indonesia suggests that the scope of the standard to be developed should be broadened to include not only pasteurized camel milk, but also other widely traded camel milk products, such as camel milk powder. This would ensure the standard remains relevant to global trade dynamics.	**Indonesia**
Mongolia, as a Member of the Codex Alimentarius Commission, strongly supports the development of a Codex international standard for pasteurized camel milk. Mongolia recognizes the importance of protecting consumer health, ensuring fair trade, and promoting authenticity in camel milk products, and therefore welcomes this new work. National data from Mongolia on camel population, production volumes, and fermented camel milk products is attached for reference. (see response to the question "**If affirmative to any of the above questions, please share relevant additional data/information, including any data on the production of pasteurized camel milk and/or related camel milk products and/or export/import data on these products.**")	**Mongolia**
The United States appreciates the opportunity to review Appendix I containing the proposal for the development of a standard for pasteurized camel milk from the United Arab Emirates (UAE) and Appendix II containing the gap analysis as recommended by the 47th session of the Codex Alimentarius Commission (CAC). The United States respects the proposal's rationale and intention to develop a Codex standard to facilitate the safe international trade of camel milk. In assessing the feasibility of this effort, the United States sees three areas of hesitation with regard to the clarity of the proposal and the relative importance of new work in this area: 1. Existing Codex documents address the food safety and trade needs raised in the proposal 2. Insufficient scientific evidence to develop a standard and any associated compliance requirements 3. Insufficient justification for Codex resource allocation based on the volume and pattern of pasteurized camel milk trade between countries With these three overarching concerns in view, the United States questions whether the proposed new work is warranted. Existing Codex documents The United States has reviewed the proposal and Appendices I and II and our analysis indicates that existing Codex documents could be used to support trade of pasteurized camel milk, making the development of a new standard	**USA**

COMMENT	MEMBER / OBSERVER
unnecessary. Specifically, the Codex General standard for the labelling of prepackaged foods (CXS 1-1985) already addresses fraudulent labelling concerns, and the Codex General standard for the use of dairy terms (CXS 206-1999) prohibits mixing of milks from different species without declaration. Further, the Code of hygienic practice for milk and milk products (CXC 57-2004) details validated food safety control measures that are applicable to different milk types, including camel milk. Insufficient scientific evidence In its review, the United States identified several areas where additional scientific evidence is needed to enable development of a standard and any associated compliance requirements. These areas include: the validation of camel milk pasteurization conditions, the implications of pasteurization on food safety in conjunction with component functionality, and the detection methods for key markers of processing and authenticity of camel milk. The lack of conclusive data in these areas suggests that it is scientifically premature to support the development of a Codex standard. Below are the areas identified for further study: • Concerns with the efficacy of the camel milk authenticity test method. Currently, the absence of beta-lactoglobulin (LG) is considered an identification marker for camel milk. Existing laboratory methods would be impractical or ineffective for use in verifying the absence of LG in camel milk. First, the only available international method, ISO 13875 | IDF-178, "Liquid milk – Determination of acid soluble Beta-lactoglobulin content – Reverse-phase HPLC method," would not be practical for routine use based on the dependency for highly specialized equipment and technical expertise. Most importantly, due to the heat related denaturation of LG and associated acid insolubility, this method will not detect the presence of denatured LG, hence, adulteration with heat treated bovine milk or other species' milk. Secondly, several proprietary Enzyme-Linked Immunosorbent Assay (ELISA) methods are available for LG detection and while they are more amenable to routine use, they are not able to detect LG once LG is treated at temperatures high enough to destroy its antigenicity. Thus, a negative result could not reliably prove the authenticity of camel milk as it could not rule out the existence of LG when it's denatured. • Lack of studies on camel milk pasteurization. The thermal treatment conditions for batch (Vat) and continuous flow (HTST) pasteurization have not been thoroughly validated with heat-resistant organisms, such as Coxiella burnetii to ensure food safety. Meanwhile, it remains unclear how the rheology, microbiology, and composition characterization of camel milk affect its pasteurization; similarly, there is a lack of data on how pasteurization affects the functionality of camel milk as an ingredient in downstream processing for other products. For example, per Appendix I, pasteurization at 80°C causes separation in milk; other potential effects of pasteurization remain to be studied. Further studies are critical for determining pasteurization parameters for camel milk to improve product safety and quality. • Selection of pasteurization processing indicator. Studies have demonstrated that Alkaline Phosphatase (ALP) activity in raw camel milk was measured at a similar level in raw bovine milk. In contrast to bovine milk, the ALP enzyme in camel milk was not inactivated by pasteurization at 72 °C, and only minimal reduction in activity was observed even after prolonged heating. Therefore, ALP is not a good indicator for the pasteurization of camel milk. Alternative pasteurization markers would be needed and remain for further study and characterization. Need for trade data	

COMMENT	MEMBER / OBSERVER
The United States is of the view that the reported trade volume of camel milk does not warrant allocation of Codex resources to develop a standard when that trade is already supported by existing Codex standards. Pasteurized camel milk trade data indicate a trading volume of <1,000 tons annually for most exporting countries with only two countries trading more than that level at 1800 and 2367 tons. Challenges and costs associated with trading a liquid product requiring cold chain management are also limiting factors for international trade of pasteurized camel milk.	
FIA views that the main concerns in the project document have already been addressed in the gap analysis outlined in Appendix II. Existing Codex standards applicable to milk and milk products appear to sufficiently cover camel milk and its derivatives. As such, it is unclear what additional benefit would be gained from initiating further Codex work in this area. We suggest that new work may not be necessary at this time.	**FIA**
IDF recognizes the importance of camel milk for consumers and livelihoods, particularly in countries in Africa and the Near East regions. While we appreciate the increased production of camel milk, which highlights its relevance and commercial potential, we believe there is still a dearth of data on the volume and patterns of international trade for pasteurized camel milk, which is a critical criterion for Codex to initiate new work. The volumes of international trade that have been provided show insignificant volumes of trade (e.g., most exporting countries trade less than 1000 tonnes annually with only two countries internationally trading 1800 and 2367 tonnes each). Pasteurized camel milk is a liquid product, which naturally limits the volumes traded internationally due to the cost of transport while keeping the cooling chain. Codex standards are to facilitate international trade, and if there are insignificant volumes of international trade, the work should not be prioritized. We note that pasteurized milk from any species has not required a Codex standard with compositional criteria to continue being successfully traded internationally. • In addition, the other concerns raised in the proposal are already addressed as per the conclusions of the gap analysis in Appendix II and therefore the work should not progress. The proposal aims to develop a standard for pasteurized camel milk to outline its compositional specificities, to provide authenticity criteria and include a compilation of existing standards relevant to safety, quality, testing methods and labelling requirements. However, as discussed below, these concerns would be fully addressed through the adoption of existing Codex texts with implementation supported by the food fraud work underway within CCFICS. • Determination of authenticity of camel milk products o The current proposal emphasizes the challenge of guaranteeing the authenticity of camel milk products. However, Codex already prohibits undeclared mixing of different species' milks through the provisions of the Codex General Standard for Use of Dairy Terms (CXS 206-1999) and Codex General Standard on the Labelling of Prepackaged Food (CXS 1-1985). Such provisions can already be adopted by national authorities as a first step to provide a legislative basis to prevent adulteration. If such adoption of these existing provisions does not address the issue of adulteration, this would indicate that the issue cannot be resolved by the development and adoption of a new Codex standard and that there is a gap in monitoring and enforcement of the regulations. In this case, national authorities are responsible for monitoring adulteration and enforcing the provisions that make adulteration illegal. The ongoing work on developing Guidelines on the Prevention and Control of Food Fraud at CCFICS to develop guidance for national authorities in	**IDF/FIL**

COMMENT	MEMBER / OBSERVER

establishing national food fraud control programs will be a useful resource.
• Existing Codex guidance of production and characterization
  ○ As concluded in Appendix II, IDF has not identified any gaps in the current Codex texts under CCMMP or other horizontal standards that would prevent compliance of internationally traded camel milk products. For instance, the Code of Hygienic Practice for Milk and Milk Products (CXC 57-2004) outlines validated food safety control measures, rather than mandating specific processes for different types of milk. This approach ensures sufficient flexibility to accommodate the unique characteristics of camel milk.
  ○ The proposal in the project document suggests compiling material from the existing standards into a new standard. We question the value of Codex resources being used on consolidating existing Codex texts. We note that countries who adopt Codex standards and guidelines can choose to consolidate elements from multiple Codex texts into a national standard or guideline as appropriate.	

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
Area 1: Need for the work - Consumer health protection and fair-trade practices	
With regards to the questions in area 1 - Australia is not aware of any issues outside of those that have been presented in the new work proposal, and we have not encountered challenges with trade, safety or quality issues.	**Australia**
نـ عم	**Iraq**
Are you, as a producing and/or consuming Member or as an Observer, aware of any additional food safety and/or quality concerns regarding camel milk apart from those addressed in the discussion paper?	
Costa Rica is not aware of any reported cases of additional safety or quality issues related to camel milk. However, it considers it essential that the standard address, in a preventive manner, mechanisms to guarantee the authenticity of the product. In this regard, we propose that a parameter for β-lactoglobulin be incorporated as a reliable indicator of authenticity, using validated analytical methods to ensure its uniform application. We recognize that this issue requires a specific technical approach, and therefore suggest consulting with CCMAS to determine the relevance of establishing quantitative parameters or, failing that, to assess its inclusion as a reference in the methods of analysis section of the standard.	**Costa Rica**
No	**Egypt**
At this time, Indonesia does not have data or experience with the food safety aspects of camel milk products other than what has been outlined in the project document.	**Indonesia**
Yes, Kazakhstan as a producing member is aware of any additional food safety and/or quality concerns regarding camel milk	**Kazakhstan**
No	**Kenya**
No, the United States is not aware of any food safety and/or quality concerns regarding camel milk.	**USA**
No.	**FIA**

COMMENT	MEMBER / OBSERVER
IDF is not aware of any food safety and/or quality concerns regarding camel milk that impair international trade.	**IDF/FIL**
Have you experienced challenges / problems with some of the quality issues identified such as those related to fraud or authenticity and if so can you provide specific information with regard to these issues?	
Costa Rica has no comments.	**Costa Rica**
No	**Egypt**
No, official authorities responsible for safety of camel milk and products made of it have no any information related to food fraud.	**Kazakhstan**
Yes, that is: • Adulteration of camel milk with that of other species for example cattle milk constituting a form of fraud and exposing consumers to potential health risks from cows milk lactose (Note: Camel milk has low lactose content). • Adulteration with water particularly in the informal markets. • Veterinary drug residues in some cases resulting from misuse by some herders • Use of traditional preservation methods which impart off-flavours and odors to the milk and products processed from the milk • High bacterial load contamination due to poor hygiene, harsh environmental conditions (high temperatures) and limited infrastructure (lack of sufficient cold chain).	**Kenya**
Mongolia highlights the risk of adulteration (e.g., dilution with bovine milk) and the absence of international authenticity criteria as critical challenges. A Codex standard will address these risks, protect consumers, and ensure fair practices in trade.	**Mongolia**
The United States does not have experience with any challenges / problems with the quality issues identified.	**USA**
No.	**FIA**
IDF is not aware of any challenges / problems with the quality issues identified, such as those related to fraud or authenticity.	**IDF/FIL**
Have you encountered any trade issues regarding pasteurized camel milk or camel milk products?	
Costa Rica has no comments.	**Costa Rica**
No	**Egypt**
Furthermore, as camel milk products are not widely traded in Indonesia at present, we do not have specific information regarding any trade issues associated with this product.	**Indonesia**
لا	**Iraq**
One issue was related to the level of phthalates in raw and processed camel milk. According to normative documentation, the permissible limit is 0.6 mg/kg, while detected concentrations could be more. The compounds identified included trace amounts of dibutyl phthalate (DBP) and di (2-ethylhexyl) phthalate (DEHP). These findings necessitated the implementation of additional monitoring measures.	**Kazakhstan**
Yes, some export consignments have been reported as adulterated with cow milk Unregulated Informal trade of raw camel milk within the country and other neighboring countries, hence lack of traceability.	**Kenya**

COMMENT	MEMBER / OBSERVER
No, the United States has not encountered trade issues regarding pasteurized camel milk nor camel milk products.	**USA**
No.	**FIA**
IDF is not aware of any trade issues regarding pasteurized camel milk nor camel milk products.	**IDF/FIL**
Taking into account the gap analysis in Appendix II, what do you consider to be the gaps, if any, that would support the need for new work on camel milk?	
It would appear from the gap analysis undertaken and presented at Appendix II that the existing food safety and quality provisions in Codex texts would be inclusive of camel milk.	**Australia**
Costa Rica considers that the analysis presented in Appendix II clearly demonstrates the existence of regulatory gaps that justify the initiation of new work in the field of camel milk. In particular, the absence of authenticity criteria that would allow this product to be differentiated from other types of milk, which is essential to prevent adulteration and fraud that could mislead consumers in their purchasing decisions or deceive them. Furthermore, it is noted that the current Codex standards for milk and milk products do not take into account the technological and compositional characteristics of camel milk, such as its protein percentage, fat content, and total milk solids, among others, in order to guarantee the authenticity and quality of the product. Having a specific standard, such as the one proposed, would reduce inconsistencies between national and regional standards on key aspects such as minimum fat and non-fat solids content, which would help to avoid possible technical barriers to international trade and facilitate regulatory harmonization processes.	**Costa Rica**
N/A	**Egypt**
-دول ية ومعاي ير موا صد فات غ ياب (Codex) -الم يكروب يول وج ية ال سلامة عن ال ع لم ية ال ب ياذ ات ذ قص -الملائ م ال صد ناع ية والمعال جة ال تك نول وج يا محدودي ة -وال وظ ي في ال غذائ ية ال ق يمة حول ال موث قة الأدل ة ق لة -الدول وال تسوي ق ال تجارة أنظمة ف ي ث غرات	**Iraq**
In many camel milks produced countries there is no statistical data collection on camel milk production/consumption/sales.	**Kazakhstan**
The analysis has not established any gaps within the existing codex standards. While the codex standards are not specific to pasteurized milk, the development of an international standard for pasteurized camel milk may not have much significance on international trade given the short lifespan of pasteurized milk products. However, such a standard would contribute to consumer protection at country level and less on international trade given the shelf life of the product.	**Kenya**
As New Zealand is not a producer or trader in camel milk and camel milk products we do not have any specific comments on the questions listed under Area 1 other than on the gap analysis. From New Zealand's perspective the gap analysis presented in Appendix II confirms the general conclusion that existing Codex texts are adequate to cover the issues of labelling and product authentication raised by camel milk producing countries. These existing Codex texts that apply to all milk products are equally applicable to camel milk products. This confirms that no adjustments to existing Codex texts are required. In support of the gap analysis on protection against adulteration we note milk from all species is susceptible to fraud and adulteration. It would be more	**New Zealand**

COMMENT	MEMBER / OBSERVER
effective and efficient to apply the same tools to manage adulteration concerns for camel milk products as those used for other species' milks. The gap analysis shows there are provisions in the General Standard for Use of Dairy Terms (GSUDT), and the General Standard for Labelling of Prepackaged Foods (GSLPF) that make undeclared mixing of different species' milks illegal and these can be adopted by national authorities. Consideration of any gaps requiring future work should consider if there is a gap in the existing standard or if it is rather with implementation and enforcement of the standard. If it is the latter, consideration should be given to the guidance developed through the ongoing work at Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) when establishing national food fraud control programs. This guidance will cover practical elements to support implementation and enforcement of the regulations including the prevention, detection, mitigation, and control of food fraud. Across all camel milk commodities (i.e. not only pasteurised camel milk) the only potential gap identified was in relation to the classification of milk powders based on the fat content. However, as noted in Appendix II, standardisation can be undertaken to mitigate variations in fat content, resulting in a "whole milk powder" classification if desired. We acknowledge that the responses to the questions listed will be important to guide the Codex Alimentarius Commission (CAC) assessment and determination about the need for a Codex standard for pasteurised camel milk.	
The United States considers that the gap analysis demonstrates that existing Codex horizontal texts and texts related to milk apply to camel milk and, in light of the robust trade in milk of other species, that there is therefore no need for new work in Codex on camel milk. Although camel milk may have unique characteristics when considering the development of a Codex standard, the United States has identified several areas stated above that require further research, indicating that establishing a Codex standard for camel milk is premature at this time.	**USA**
We do not consider there to be any gaps that would support the need for new work on camel milk. As highlighted in the gap analysis provided in Appendix II, existing Codex standards for milk and milk products are applicable to camel milk and its derivatives. We note that the proposal in the project document suggests compiling the existing standards into a new standard. We question the value of Codex resources being used on consolidating existing Codex texts. Countries who adopt Codex standards and guidelines can choose to consolidate elements from multiple Codex texts into a national standard or guideline as appropriate. The development of a separate Codex standard solely for camel milk may not add substantive value. In addition, the concerns around adulteration of camel milk have also been addressed in the gap analysis. The General Standard for Use of Dairy Terms (GSUDT) and the General Standard for the Labelling of Prepackaged Foods (GSLPF) already exist and state that camel milk cannot be mixed with other species' milks without declaration. This appears to already regulate against adulterating camel milk with other species' milks. Regulating this further with more detailed prescriptive requirements such as around specific compositional markers that indicate undeclared mixing would not, in our view, lead to improved compliance. Instead, we note that there is work being done at Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) on developing Guidelines on the Prevention and Control of Food Fraud. We	**FIA**

COMMENT	MEMBER / OBSERVER
believe this workstream is a more suitable avenue for addressing enforcement and compliance issues, including those related to camel milk adulteration.	
IDF does not consider there are any gaps that would support the need for new work on camel milk. The existing Codex standards that apply to all milk and milk products have been shown to also apply to camel milk and camel milk products as per the gap analysis in Appendix II. There are therefore already applicable regulations that apply. We would like to emphasize that the concerns around adulteration of camel milk have also been addressed in the gap analysis. The Codex General Standard for Use of Dairy Terms and the Codex General Standard for the Labelling of Prepackaged Foods already exist and require that camel milk cannot be mixed with other species' milks without declaration. This already includes provisions to guard against adulterating camel milk with other species' milks. Regulating this further with more detailed prescriptive requirements such as around specific compositional markers that indicate undeclared mixing would not, in our view, lead to improved compliance. We note that there is work being done at CCFICS on developing Guidelines on the Prevention and Control of Food Fraud. This could provide guidance on how to effectively enforce the existing regulations to prevent food fraud.	**IDF/FIL**
If affirmative to any of the above questions, please share relevant additional data/information, including any data on the production of pasteurized camel milk and/or related camel milk products and/or export/import data on these products	
Costa Rica supports the proposed scope.	**Costa Rica**
N/A	**Egypt**
داخلي نطاق على فهو وجد وان الانتاج لقلة العراق في النوق حليب عن بيانات لاتوجد فقط	**Iraq**
Mongolia supports the development of an international Codex standard for pasteurized camel milk. National data from Mongolia on camel population, production volumes, and fermented camel milk products is attached for reference. Mongolia currently maintains a camel herd of ~0.48 million head (2024), with 186,000 milking camels, predominantly Camelus bactrianus. Production of raw camel milk reached 19,500 tonnes in 2024, demonstrating consistent growth compared with 2019 (11,400 tonnes). Pasteurized camel milk production increased from 3.5 tonnes (2021) to 7.2 tonnes (2024), and powdered camel milk reached 8.5 tonnes (2024). Fermented camel milk production rose dramatically, from 9.1 tonnes (2019) to 125 tonnes (2024), reflecting strong consumer demand and cultural importance.	**Mongolia**
N/A	**USA**
We have no additional data. However, we would like to note that given the purpose of Codex is to support international trade, it is important to consider the level of international trade of pasteurised camel milk as part of determining whether work should proceed on a new standard for pasteurised camel milk. The project document has very limited international trade data to support the work progressing.	**FIA**
We have no additional data. However, we would like to note that given the purpose of Codex is to facilitate international trade, it is important to consider the level of international trade of pasteurized camel milk as part of determining whether work should proceed on a new standard for pasteurized camel milk. The project document has very limited international trade data to support the	**IDF/FIL**

COMMENT	MEMBER / OBSERVER
work progressing. As per our general comments, the international trade data that has been provided indicate insignificant levels of trade e.g. most exporting countries trade less than 1000 tonnes annually with only two countries internationally trading 1800 and 2367 tonnes each.	
Area 2: Possible extent and nature of work to be undertaken	
If new work is to be undertaken, is the proposed scope of that work to focus on pasteurized camel milk appropriate, taking into consideration existing Codex texts on milk and milk products or do you have any suggestions for the scope?	
Australia notes a key concern is about authenticity. This issue of food fraud could be considered more broadly regarding how it may be effectively managed through traceability systems, food fraud prevention strategies, and by oversight and enforcement by competent authorities. The Codex Committee on Food Import and Export Inspection and Certification Systems is an ideal forum to consider this issue, and Australia draws the attention of the committee to two guidelines under development that would provide tools to help countries prevent and address food fraud: • Draft guidelines on the prevention and control of food fraud. • Draft principles and guidelines on traceability/product tracing within a national food control system (updating CXG 60-2006).	**Australia**
Costa Rica has no comments.	**Costa Rica**
Yes, the proposed scope of that work is appropriate.	**Egypt**
The scope of this standard must be broad, covering not only pasteurized milk but also other widely traded products like camel milk powder, etc.	**Indonesia**
مناسب المجال	**Iraq**
Experiments are currently underway in Kazakhstan to determine the conditions for pasteurizing camel milk, funded by the Ministry of Agriculture. The results will be available next year.	**Kazakhstan**
The scope would be appropriate as the other codex standards do not cover pasteurized milk products. The scope seeks to address the unique compositional characteristics and potential for adulteration of camel milk.	**Kenya**
The standard should explicitly cover both dromedary and Bactrian camel milk, ensuring inclusivity of different production systems.	**Mongolia**
The proposal to develop a Codex standard for pasteurised camel milk will need careful assessment taking into account the statutory purpose of Codex and the criteria for new work. As noted in our general comments, there are, currently, no liquid milk standards for any species. This may be a reflection of the nature of these products and absence of any significant issues from trade or food safety perspectives. The Discussion Paper and Project Document in Appendix I indicates that there is no significant international trade in liquid camel milk with the bulk of the production consumed in its raw form within the producing countries. The analysis presented in Appendix I raises concerns about fraud and deceptive practices with regard to labelling of camel milk. While this is a legitimate concern it is not unique to camel milk and as per the conclusions in Appendix II, the existing Codex standards can support addressing these concerns. Prevention of fraud and deceptive practices is of broad interest across many food products. As noted in the gap analysis the GSUDT and the GSLPF are relevant to address concerns around fraud and deceptive labelling. In addition, CCFICS is currently working on draft guidelines for prevention and control of food fraud.	**New Zealand**

COMMENT	MEMBER / OBSERVER
We do not consider the scope of the work for a new standard should be to consolidate the relevant existing Codex texts developed by CCMMP and horizontal committees. This is not relevant and has no relationship to the proposal to develop a camel milk standard. If guidance is required on which Codex texts and specifically which provisions are relevant, consideration should be given if this can be developed outside of a Codex standard or outside of Codex entirely. If some national authorities have less experience or engagement with Codex, then there is opportunity for sharing knowledge of how to navigate Codex. There is deep Codex expertise across Codex staff, member countries, and observer organisations such as IDF and we propose that the sharing of this knowledge and expertise is more valuable in the longer term, rather than developing individual or consolidation standards.	
It is important to emphasize there are many areas that need further evaluation for camel milk before enough of a scientific basis has been established to develop a standard unique to this commodity. The United States does not have suggestions at this time as it would be premature for Codex to initiate new work in developing a standard for camel milk.	**USA**
We do not believe work should be undertaken if existing Codex texts are taken into consideration. This is because the gap analysis in Appendix II shows that there are no gaps to fill in the existing Codex texts.	**FIA**
IDF does not believe work should be undertaken due to existing Codex texts already containing the necessary provisions to enable international trade as concluded by the gap analysis in Appendix II.	**IDF/FIL**
Please indicate the specific products, if any, you think any work should focus on	
Costa Rica believes that, if this new work is to be undertaken, it should focus for now on drafting the standard for pasteurized camel milk intended for direct consumption. Other camel milk products could be evaluated at a later stage, once clear guidelines for the base product are in place.	**Costa Rica**
We recommend starting with raw and pasteurized camel milk.	**Egypt**
Kazakhstan won gold at the 2025 Le Mondial du Fromage Cheese Championship (Tours, France) for its camel milk cheese, "Kymyzkhan." It also won silver for its traditional "Camel Balkaymak". https://kz.kursiv.media/2025-09-16/zhki-kazahstanskie-syry-vyigrali-zolotye-medali-vo-francii/	**Kazakhstan**
• Pasteurized camel milk standard (for consumer protection at country level and for trade). • UHT camel milk standard (However there is evident separation after two weeks of processing (based on the done trials in Kenya), but this does not make the product unsafe) • Fermented milk for camel milk, particularly the yoghurt might not meet set requirements in the CXS 243-2003 Standard for Fermented Milks, because of the technological challenges resulting in undesired sensory outcomes e.g. ropiness/sliminess and saltiness • Camel milk powder (Needs to be considered because of the wide variation in fat content within the species and in comparison, with milk from other species)	**Kenya**
N/A	**USA**
N/A	**FIA**
N/A	**IDF/FIL**

COMMENT	MEMBER / OBSERVER
What kind of Codex text (standard, guideline, code of practice) do you think might best address the issues identified in the discussion paper or other issues related to this commodity group that are relevant to protecting consumers' health and ensuring fair practices in the food trade	
Costa Rica considers that the most appropriate instrument would be a regulation, in order to clearly establish the criteria for composition and labeling, in accordance with existing horizontal texts.	**Costa Rica**
The standards will protect the health of consumers ' health and ensuring fair practices in the food trade.	**Egypt**
Indonesia is of the view that if this proposal advances as new work, it should be to develop a commodity standard for camel milk.	**Indonesia**
مواصفة	**Iraq**
All kind of Codex text (standard, guideline, code of practice)	**Kazakhstan**
The following codex texts are recommended. 1. CXS 207-1999, Standard for Milk Powders and Cream Powder (partially addresses) 2. CXS 243-2003 Standard for Fermented Milks (Partially addresses) 3. CXC 57-2004, Code of hygienic practices for milk and milk products. 4. CXS 1-1985, General standard for the labelling of Pre- packaged foods 5. CXC 1-1969, General principles of food hygiene Principles	**Kenya**
The United States does not believe new Codex texts are needed to address issues related to camel milk as existing Codex documents address concerns noted in the proposal. Specifically, the Codex General standard for the labeling of prepackaged foods (CXS 1-1985) addresses fraudulent labelling concerns, and the Codex General standard for the use of dairy terms (CSX 206-1999) prohibits mixing of milks from different species without declaration. These existing Codex documents are available to national regulatory authorities to assist with trade or to develop their own national regulations for pasteurized camel milk, especially relating to the issues of authenticity and fraud highlighted in the discussion paper. Given the existence of relevant Codex texts, the United States considers that development of a new Codex text would not be an efficient use of limited Codex resources and could introduce the risk of confusion, duplication, and/or contradiction with the existing body of Codex guidance.	**USA**
We do not believe that a new Codex text is needed. We disagree with the suggestion in the project document that a consolidated standard that compiles existing Codex texts is appropriate.	**FIA**
We do not believe that a new Codex text is justified. We disagree with the suggestion in the project document that a consolidated standard that compiles existing Codex texts is needed.	**IDF/FIL**
Area 3: Importance of work for Members	
Is developing an international standard for pasteurized camel milk or camel milk products a priority for you or for Codex taking into account the criteria for prioritization in the Codex Procedural Manual?	
Noting the outcomes of the gap analysis, it appears that consumer health protection and fair practices in the food trade could be managed using existing texts and some under development currently.	**Australia**
For Costa Rica, developing a standard for camel milk is not a national priority, given that there is no domestic production or consumption of this product. However, we recognize that establishing an international standard would contribute to harmonization and consumer protection in countries where this	**Costa Rica**

COMMENT	MEMBER / OBSERVER
product is commonly consumed and would strengthen conditions for fair trade, especially in light of the risks of adulteration and fraud.	
Yes, the priority is to prevent fraud and maintain the quality and health value of these products.	**Egypt**
According to the Criteria for the establishment of work priorities, prioritizing new work requires not only production data but also data on consumption and international trade. Since the project document does not sufficiently illustrate the consumption data for this product, it is difficult for Indonesia to ascertain the urgency or high priority of developing this international standard at this time.	**Indonesia**
ن عم	**Iraq**
Developing an international standard for pasteurized camel milk or camel milk products is a priority for Kazakhstan	**Kazakhstan**
Yes, this is a priority as camel milk is an important food commodity in ASAL countries/regions and therefore the need for consumer protection and trade facilitation.	**Kenya**
Camel milk is of strategic importance for rural livelihoods in Mongolia, particularly in desert and steppe regions. National data shows a clear upward trend in production, including small-scale industrialization (pasteurized, powdered, and fermented products). 024, Mongolia exported 61.9 kg of camel milk products to China, marking the start of formal trade. This underlines the importance of harmonized Codex standards to expand market opportunities.	**Mongolia**
New Zealand is not a producer or trader of camel milk or camel milk products. The project document and discussion paper have not demonstrated a compelling need to initiate work on developing a standard for pasteurised camel milk, or a standard for other camel milk products. The criteria for prioritisation in the Codex Procedural Manual, considering the gap analysis in Appendix II, alongside other information provided in the CL does not support that this work should be a priority for Codex. We do, however, have an interest in the issue as the host government of CCMMP.	**New Zealand**
From the U.S. perspective, development of an international standard for pasteurized camel milk is not a priority. A new standard is not necessary for consumer protection or fair practices in food trade because existing Codex texts apply and address potential concerns identified by the proponents of the new work.	**USA**
No, it is not a priority to FIA for Codex to develop an international standard for pasteurised camel milk or camel milk products. The prioritisation criteria in the Codex Procedural Manual has a general criterion relating to consumer protection, and we do not believe that a new standard is necessary for consumer protection as there are sufficient existing provisions in existing Codex texts.	**FIA**
It is not a priority for us that Codex develops an international standard for pasteurized camel milk nor camel milk products. The prioritization criteria in the Codex Procedural Manual has a general criterion relating to consumer protection. We do not believe that a new standard is necessary for consumer protection as, in this case, there are sufficient existing provisions in existing Codex texts.	**IDF/FIL**
Would you be interested in and willing to participate in this work if Codex initiates the process to undertake new work based on the attached proposal?	

<table>
<tr><th>COMMENT</th><th>MEMBER / OBSERVER</th></tr>
<tr><td>Costa Rica wishes to express its desire to contribute constructively to the development of this standard, ensuring that it is technically sound, internationally applicable, and facilitates both the protection of public health and transparency in trade.</td><td>Costa Rica</td></tr>
<tr><td>Yes, we are interested</td><td>Egypt</td></tr>
<tr><td>نـ عم</td><td>Iraq</td></tr>
<tr><td>Yes, Kazakhstan is interested in and willing to participate in this work</td><td>Kazakhstan</td></tr>
<tr><td>Yes,
• Kenya is willing to participate in the process in order to collect and contribute relevant data that will facilitate the development of the standard considering the high camel milk production within the country.
• Kenya is also willing to lead or join the working group/task force in the development of this standard.</td><td>Kenya</td></tr>
<tr><td>Developing a Codex standard is therefore a priority for Mongolia, and we express willingness to actively participate by sharing data, technical expertise, and national perspectives on Bactrian camel milk.</td><td>Mongolia</td></tr>
<tr><td>Although the United States believes that it is premature to develop a Codex standard, if the new work proposal were to be accepted, we would be interested, engaged, and willing to support the effort and help ensure alignment with existing standards. In particular, if new work were undertaken, the United States is of the view that care should be taken to ensure any standard for camel milk is complementary—and not duplicative or confounding—to the existing robust body of Codex standards that uphold the trade of milk and milk products globally. The existing body of Codex references already support and facilitate the trade of milk and milk products, including that of camel milk, and if undertaken, a standard for camel milk should address only science-based safety and quality factors where camel milk is not already covered by Codex standards. Where safety and quality are already covered by other standards, reference should be made to those standards without additions. As mentioned above, the United States has concerns that the specificities of camel milk vis-à-vis other species' milk require further evaluation before a sufficiently founded scientific basis is established to support standard development.</td><td>USA</td></tr>
<tr><td>FIA does not support the new work.</td><td>FIA</td></tr>
<tr><td>Although IDF does not support the work progressing, IDF as the global expert voice on milk and milk products will remain engaged on any further work should this topic progress.</td><td>IDF/FIL</td></tr>
<tr><td colspan="2">Area 4: Mechanism for how any future work on this could be undertaken</td></tr>
<tr><td colspan="2">In your view, if considered a priority and approved by CAC, what might be the appropriate mechanism for undertaking the proposed work?</td></tr>
<tr><td>If work were to be undertaken it should be undertaken by the body with the most relevant expertise to address the agreed upon problem.</td><td>Australia</td></tr>
<tr><td>Costa Rica considers that the most appropriate mechanism would be to develop the standard through a working group by correspondence, led by the Codex Committee on Milk and Milk Products (CCMMP), in close coordination with the relevant horizontal committees on safety, contaminants, additives, methods of analysis, and labeling. This approach would ensure that the specific characteristics of camel milk are integrated in a manner consistent with general Codex texts, avoiding duplication of effort and ensuring a result consistent with the mandate to protect consumer health and promote fair practices in international trade.

Additionally, it is important that the new standard refer to the provisions established in the General Standard for the Labeling of Prepackaged Foods (CXC 1-1969) and the General Standard for the Use of Dairy Terms (CXC 206-</td><td>Costa Rica</td></tr>
</table>

COMMENT	MEMBER / OBSERVER
1999), in order to ensure regulatory consistency, maintain focus on the specific aspects of camel milk, and avoid misleading or deceiving consumers.	
The work should be carried out through the (CCMMP), compiling all studies that have addressed the effect of heat on camel milk quality to determine the appropriate degree of pasteurization and define milk specifications that can be applied globally.	**Egypt**
Since the Codex Committee on Milk and Milk Products is currently adjourned sine die, we suggest that the CAC reactivate the Committee to undertake this work. This work can be carried out through working by correspondence.	**Indonesia**
هي الأنـ سب الآلـ ية -جديـ د عمل اقـ تراح -مـ ذ تجة دولـ ة بـ ق يادة إلـ كـ تروذ ي عمل فـ ريـ ق -من عـ لمي دعم FAO/WHO	**Iraq**
The appropriate mechanism for undertaking the proposed work is through the EWG	**Kazakhstan**
The relevant committees could handle the work through a hybrid of electronic working groups and physical meetings. These committees could include: • Codex Committee on Milk and Milk Products (CCMMP) • Codex Committee on Food Hygiene (CCFH)	**Kenya**
Mongolia supports assigning this work to the Codex Committee on Milk and Milk Products (CCMMP), with necessary input from horizontal committees (Food Hygiene, Food Additives, Methods of Analysis and Sampling). The process should ensure inclusive treatment of both camel species, Camelus dromedarius and Camelus bactrianus. We recommend developing the standard in necessary sessions, based on the gap analysis and data collected, with clear inclusion of authenticity criteria to prevent fraud.	**Mongolia**
The CCMMP is currently adjourned sine die and the current new work proposal is the only one for consideration. Should the CAC agree to the new work proposal, a possible way forward might be to reactivate the CCMMP to work by correspondence in line with the Guidelines for Committees working by correspondence. This mechanism provides the necessary flexibility to convene ad hoc physical working group meetings (open to all members of the CAC) to develop the draft standard for consideration by the Committee either by virtual or other means. This modality would be similar to that used by the Codex Committee on Fish and Fishery Products (CCFFP) during its recent deliberations. Ensuring a clear and limited scope would be critical in the success of any such work. The developed standard's structure and scope needs to be consistent with and not duplicate existing Standards.	**New Zealand**
Given the limited nature of any future work as well as the stated niche and informal trade of this commodity, the United States considers that, if approved, any future work in this area should proceed by correspondence only, with clear terms of reference that ensure the work can be completed within a limited and explicitly defined scope of work.	**USA**
FIA does not support the new work.	**FIA**

ПРИЛОЖЕНИЕ II

Предложение о новой работе по выработке принципов анализа риска, связанного с новыми источниками и системами производства продовольствия (НИСПП)

С дискуссионным и проектным документом можно ознакомиться по ссылке.