

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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COMMENTS ON THE PROPOSAL FOR DEVELOPMENT OF PRINCIPLES FOR THE RISK ANALYSIS OF NEW FOOD SOURCES AND PRODUCTION SYSTEMS (NFPS)

Submitted by

*Algeria, Australia, Brazil, Canada, Chile, Colombia, Costa Rica, Egypt, Japan, Kazakhstan,
New Zealand, Norway, Oman, Peru, Saudi Arabia, Sudan, United Kingdom, Uruguay, the United States
of America (USA) and Food Industry Asia (FIA), the Good Food Institute, International Dairy Federation
(IDF/FIL)*

BACKGROUND

1. This document compiles the comments on the request for comments on the new work proposal on development of principles for the risk analysis of new food sources and production systems (NFPS), as indicated in the relevant circular letter (CL 2026/44-CAC). The comments include those received through the Codex Online Commenting System (OCS)¹, or via email by the time this document was issued.
2. The comments in response to CL 2026/44-CAC is shown in Appendix I.

EXPLANATORY NOTES ON APPENDIX I

3. 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).

¹ 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.

COMMENTS IN REPLY TO CL 2026/44-CAC

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
<ul style="list-style-type: none"> • Australia thanks the EU for the updated new work proposal, and the considerable additional detail provided. • At CAC48 Australia expressed our view that the original new work proposal did not clearly define a problem nor how the proposed new work would be able to address it. We also expressed our view that the scope of products to be captured by the new work proposal was very broad and not adequately defined. • To address these issues, we encouraged a gap analysis of CXG 62-2007 Working principles for risk analysis for food safety application by governments and the reality of how regulators around the world were assessing the safety of NFPS. We recommended consulting Codex members where NFPS had been approved, were in the process of being approved, or where regulatory frameworks were being assessed for adequacy. • CAC asked the proponents to conduct a gap analysis and solicit the experiences of Members to clearly establish the gaps in the risk analysis of NFPS to avoid duplication and inconsistency. • Australia's remains of the opinion that a clear gap has not been identified, there is not an adequate case for the benefit of developing risk analysis principles for NFPS, and the proposed scope remains too broad to be amenable to standardisation. 	Australia
<p>Brazil thanks the European Union for the new work proposal and welcomes the initiative to explore future discussions on new food sources and production systems. However, at this stage, Brazil considers that the proposed work would benefit from a clearer definition of its scope and objectives before advancing. In particular, there remains uncertainty regarding how Codex would distinguish and address concepts such as novel foods, new food sources, and new food production systems, given the significant differences among national regulatory frameworks, food classification approaches, and food consumption patterns. These concepts are not consistently defined across jurisdictions and may reflect differing historical, cultural, and regulatory contexts, creating challenges for the development of harmonized international guidance. Brazil also considers it important to assess how any future work would interface with existing Codex texts and principles related to risk analysis, in order to avoid overlaps, ensure coherence across the Codex framework, and clarify whether existing risk analysis approaches already provide elements that could support the assessment of emerging food categories and production systems.</p> <p>Brazil considers that any new work within Codex should remain strictly aligned with the mandate of the Codex Alimentarius Commission, namely the protection of consumer health and the promotion of fair practices in food trade. In this regard, concepts such as sustainability, food system resilience, and the One Health approach may be considered where relevant, but should not unduly expand the technical scope of Codex nor replace science-based food safety assessments.</p> <p>With regard to sustainability, Brazil recognizes that Codex texts may contribute to sustainability while enhancing food security. However, the motivation for this initiative could lead to the endorsement of measures that go beyond the Codex mandate, such as sustainability-related claims, which should not be treated as a presumption of safety, a basis for regulatory superiority, or a justification for additional trade-related requirements. Codex assessments should remain focused on food safety, quality, appropriate labelling, and the prevention of misleading practices.</p> <p>Regarding the One Health approach, Brazil supports its consideration where there is a direct and demonstrable link to food safety, recognizing the interconnections between human, animal, and environmental health.</p> <p>Nevertheless, such considerations should remain proportionate, science-based, and firmly linked to the food safety mandate of Codex, avoiding the incorporation of broader environmental or public health issues that fall outside the scope of food risk analysis.</p>	Brazil

<p>Colombia respalda este nuevo trabajo del Codex para armonizar normativas internacionales ante la creciente demanda global de alimentos, protegiendo la salud y evitando la fragmentación regulatoria. Es indispensable que este marco desarrolle requisitos claros basados en criterios científicos reconocidos, fomentando la innovación tecnológica sin imponer exigencias desproporcionadas ni generar discriminaciones injustificadas. No obstante, al ser un tema que aún requiere mayor maduración técnica y científica, se considera prioritario recopilar más información de base y definir obligatoriamente conceptos críticos como "nuevos alimentos" y "sistemas de producción" para delimitar con precisión su ámbito de aplicación. Por ello, el desarrollo de estos principios debe sustentarse en un sólido respaldo técnico internacional, asegurando que cualquier medida de gestión de riesgo sea viable, proporcional y basada rigurosamente en la ciencia.</p>	Colombia
<p>Japan extends its appreciation to the European Union for its efforts to refine the new work proposal following discussions at CCEXEC89 and CAC48.</p> <p>At the same time, Japan considers that important questions including the necessity of this work and the scope still remain. Therefore, Japan believes that further clarification and analysis would be useful before considering whether to initiate new work.</p> <p>Japan would like to submit the following comments on the project document for further consideration.</p>	Japan
<p>Kazakhstan expresses its gratitude to the European Union for preparing a circular letter requesting comments on a new proposal to develop principles for risk analysis related to new food sources and production systems (NIPPS). The European Union has conducted a thorough analysis of the gaps in the Codex Alimentarius regarding various aspects - regulatory, nutritional value, labeling, quality and food safety. A fair and timely assessment of the existing Codex documents regarding the risk analysis of new products is given:</p> <ul style="list-style-type: none"> - the Working principles for risk analysis for food safety for application by governments (CXG 62-2007) provide guidance to national governments for the three components of risk analysis: risk assessment, risk management and risk communication. - the Principles for the risk analysis of foods derived from modern biotechnology (CXG 44) <p>Kazakhstan is a member of the Eurasian Economic Commission. The TRCU 021/2011 "On Food Safety" (Articles 27, 28, 29) sets out the state registration, its procedure, as well as the unified register of a new type of food products, as such, without differentiation into its individual types, for example, such as cultured products, ingredients obtained by fermentation, alternative protein plant-based products, seaweed, edible insects, food products printed on a 3D printer, and microalgae.</p> <p>Kazakhstan supports the need to develop guidelines for risk analysis principles related to new food sources and production systems. The lack of specific guidance may lead to further divergence of national approaches to risk analysis, which will undoubtedly lead to inconsistent levels of health protection, as well as fragmentation and barriers to trade. This demonstrates a clear gap in the framework of the Codex and requires the urgent development of special principles for NIPPS.</p>	Kazakhstan
<p>New Zealand thanks the EU for the updated work proposal and appreciates the additional information and context provided and context. We acknowledge that the area of New Foods and Production Systems is a rapidly growing area of technology development, at a pace that is faster than current regulatory environments, including Codex can cope with. We support the need to Codex to be future proofed as much as possible and this includes ensuring that there is the appropriate regulatory framework to manage such technologies.</p> <p>While the existing framework for risk analysis included in Chapter 4 of the Procedural Manual and other Codex guidance, in particular CXG 62-2007 Working principles for risk analysis for food safety application by governments, is appropriate and covers all things at a very broad level, New Zealand sees merit in providing additional guidance/principles within the broad existing framework.</p> <p>While we think that the current paper and proposal is too broad in approach, we would welcome a more focused dialogue to ensure that our existing risk analysis framework can provide the necessary support to address the current and future technologies in providing food for all.</p>	New Zealand

<p>While we appreciate the Gap Analysis undertaken, we note that this is limited to the analysis on the 25 Members and 10 Observers that responded to the original Codex request for comment. We would recommend additional analysis on the experiences of a wider group of Members that are currently developing or working with ways to regulate some of the emerging foods and technologies.</p> <p>We strongly support dialogue on definitions and consideration of the terminology of New Food Sources and Production Systems (NFPS), including when a food or system is no longer new. We recognise that NFPS is a commonly used term, but we think that it is also problematic and that consideration of other terms to capture innovation could be explored.</p>	
<p>Oman thanks the European Union for preparing the revised discussion paper and project document on the proposed development of principles for the risk analysis of new food sources and production systems (NFPS).</p> <p>Oman recognizes the growing importance of food innovation and agrees that new food sources and production systems may contribute to addressing important global challenges related to food security, nutrition, sustainability, climate resilience, and the resilience of food systems. These developments may also help respond to emerging food safety and food security challenges, provided that appropriate regulatory oversight is in place.</p> <p>Oman therefore supports continued discussion within Codex on approaches that can assist governments in ensuring the safety of foods derived from emerging sources and production systems, while enabling responsible innovation and supporting fair practices in food trade.</p> <p>Oman also agrees that many countries, particularly those with limited experience in the assessment of novel foods and emerging food production technologies, may benefit from additional guidance, information exchange, capacity building, and international cooperation in this area.</p> <p>At the same time, Oman considers that the existing Codex framework for risk analysis remains fundamentally sound, relevant, and applicable to foods derived from both conventional and emerging production systems.</p> <p><u>Existing Codex Risk Analysis Principles Remain Relevant</u></p> <p>Oman notes that the Codex Working Principles for Risk Analysis for Application by Governments, together with the Statements of Principle Concerning the Role of Science in the Codex Decision-Making Process and the Extent to Which Other Factors Are Taken into Account, provide a comprehensive and flexible framework for science-based decision-making.</p> <p>These principles establish the respective roles of risk assessment, risk management, and risk communication. They are intentionally designed at a sufficiently high level to accommodate scientific and technological developments and to remain applicable across a wide range of food safety contexts.</p> <p>In our view, these principles are not limited to conventional foods. They have already been applied by governments and international scientific bodies in the assessment of novel substances, novel ingredients, and products derived from evolving production methods. Examples include the assessment of new food additives, processing aids, biotechnology-derived foods, and other innovative products that have entered global markets over the past decades.</p> <p>This experience demonstrates that the Codex risk analysis framework is sufficiently broad and adaptable to support decision-making in relation to emerging food sources and production systems, without requiring modification of the overarching principles themselves.</p> <p><u>Challenges Associated with Harmonizing the Concept of Novelty</u></p> <p>Oman notes that the concept of novelty presents particular challenges in an international context.</p> <p>Foods considered novel in one jurisdiction may have a long history of safe use in another. The determination of what constitutes a new food, new food source, or new production system may reflect scientific considerations, but also cultural, historical, dietary, social, and market factors that vary significantly across regions and countries.</p> <p>For this reason, attempts to establish globally harmonized principles around novelty may prove difficult and may not adequately reflect national realities. Such challenges may be</p>	<p>Oman</p>

<p>difficult to resolve even at the regional level and would likely be more complex at the global level.</p> <p>Oman therefore considers that caution is warranted before embarking on work that could seek to codify concepts that remain highly context-dependent.</p> <p><u>A More Suitable Approach: Guidance to National Governments on the Application of Existing Principles</u></p> <p>Oman recognizes the value of continued Codex work in this area. In fact, the discussion paper identifies several important areas where Codex could provide practical support to national governments without the need to develop new overarching risk analysis principles.</p> <p>In particular, Codex could develop guidance to assist national authorities in the application of existing Codex risk analysis principles to new food sources and production systems. Such guidance would support governments in designing or adapting national regulatory frameworks while remaining fully consistent with established Codex risk analysis principles.</p> <p>This guidance should be directed primarily to national governments and competent authorities. Its purpose would not be to guide Codex itself in modifying its risk analysis framework, but rather to help countries apply the existing Codex framework in a practical, proportionate, and context-sensitive manner when developing or updating national regulatory requirements for NFPS.</p> <p>Such guidance could address issues identified in the discussion paper, including:</p> <ul style="list-style-type: none"> • consideration of history of safe use; • assessment of whole foods and food ingredients; • risk management options, including pre-market authorization and notification systems; • post-market monitoring and surveillance; • application of One Health considerations where relevant; • use of information generated by other competent authorities; • transparency and communication approaches; and • regulatory reliance and international information sharing. <p>This type of practical guidance could assist countries at different stages of regulatory development, promote greater consistency in regulatory approaches, and facilitate international cooperation, while preserving the flexibility needed to reflect national circumstances, cultural contexts, dietary patterns, and regulatory priorities.</p> <p>Oman further considers that this approach could merit consideration not only at the global level but also, where appropriate, at the regional level. Should there be insufficient support for the development of such guidance at the international level, regional initiatives could provide a useful and pragmatic alternative. Regional guidance may be better positioned to reflect shared dietary traditions, cultural considerations, regulatory realities, and patterns of food innovation within specific regions. Such efforts could also support capacity development and strengthen the ability of national competent authorities to implement risk-based and proportionate oversight of new food sources and production systems, while promoting greater consistency and cooperation among countries facing similar regulatory challenges.</p> <p><u>Technology-Specific Guidance May Be a More Practical Approach</u></p> <p>Oman notes that Codex has previously addressed emerging technologies through targeted guidance rather than through modification of the overarching risk analysis framework.</p> <p>The Principles for the Risk Analysis of Foods Derived from Modern Biotechnology (CXG44-2003) provide an example of how existing Codex risk analysis principles can be applied to a specific technological domain without altering the underlying risk analysis paradigm.</p> <p>Should Codex identify a need for additional work in this area, a technology-specific approach may provide a more practical and achievable pathway. For example, future guidance could be considered for particular categories of innovation where sufficient scientific knowledge</p>	
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<p>and regulatory experience have emerged, such as <i>foods derived from cellular agriculture, precision fermentation</i>, or other specific technologies.</p> <p>Such an approach would enable discussions to focus on clearly defined scientific, regulatory, and risk assessment questions associated with particular technologies. It may also facilitate the development of international consensus, as agreement is generally more attainable when work is directed toward well-defined technological applications rather than broad principles intended to cover a diverse and continuously evolving range of food sources, production systems, and innovation pathways.</p> <p>Oman therefore considers that targeted guidance for specific categories of innovation may offer greater clarity, practical utility, and likelihood of successful implementation than the development of overarching principles applicable across the full spectrum of new food sources and production systems.</p> <p><u>Risk Assessment Methodologies Should Continue to Evolve</u></p> <p>Oman agrees that certain emerging food categories may require adaptation and modernization of risk assessment methodologies.</p> <p>Such developments may be better addressed through the evolution of scientific assessment practices and methodologies rather than through the creation of new risk analysis principles.</p> <p>This is consistent with ongoing international efforts to modernize risk assessment through the use of New Approach Methodologies (NAMs), advanced exposure assessment tools, improved characterization methods, and other scientific innovations. These developments demonstrate that the existing risk analysis framework remains applicable while scientific tools continue to evolve in support of more effective assessments.</p> <p><u>Support for Capacity Building and International Cooperation</u></p> <p>Oman strongly supports increased international cooperation in this area.</p> <p>We particularly support efforts to:</p> <ul style="list-style-type: none"> • strengthen capacity building for developing countries; • facilitate exchange of scientific and regulatory information; • promote transparency regarding safety assessments and regulatory decisions; • encourage voluntary information-sharing platforms; • support regulatory cooperation and reliance where appropriate; and • improve access to scientific assessments and evaluation outcomes relating to emerging food sources and production systems. <p>These activities would provide tangible benefits to regulators and stakeholders, regardless of the final form of any future Codex work.</p> <p><u>Conclusion</u></p> <p>Oman agrees with the importance and timeliness of addressing issues related to new food sources and production systems.</p> <p>While we recognize the value of supporting governments in addressing emerging food sources and production systems, we consider that further work may be most effectively directed toward practical guidance for national authorities, enhanced information exchange, capacity-building activities, and, where appropriate, targeted guidance addressing specific technologies or categories of innovation.</p> <p>Such an approach may provide a more pragmatic and readily implementable pathway for supporting national regulatory frameworks while building on the strong foundation already provided by existing Codex risk analysis principles.</p> <p>Oman therefore encourages further discussion on these alternative approaches before initiating work on new overarching principles for the risk analysis of NFPS.</p>	
<p>Sobre la necesidad y adecuación de la nueva propuesta de trabajo respecto al desarrollo de principios para el análisis de riesgos de nuevas fuentes de alimentos y sistemas de producción (NFPS), señalar que, la industria nacional actualmente experimenta un incremento en el desarrollo de productos basados en nuevas tecnologías (como</p>	<p>Peru</p>

<p>ingredientes obtenidos por fermentación de precisión, nanotecnologías o nanomateriales), así como importación de alimentos o ingredientes con nuevas tecnologías; por lo que, ante la existencia de un vacío regulatorio nacional, la nueva propuesta, le dará al Perú la herramienta legal para evaluar la seguridad de estos productos antes de su comercialización. La DIGESA, podría utilizar este principio, como base técnica para actualizar la legislación sanitaria y/o procedimientos como, por ejemplo: Registros Sanitarios para alimentos y/o bebidas con ingredientes innovadores.</p> <p>Sobre la Naturaleza de la nueva obra propuesta</p> <ol style="list-style-type: none"> 1. El alcance del concepto de nuevas fuentes de alimentos y nuevos sistemas de producción no aparece suficientemente delimitado. La propuesta comprende realidades muy diversas, como alimentos cultivados, ingredientes derivados de fermentación, alternativas vegetales, algas, insectos comestibles, microalgas u otros productos y tecnologías, que pueden presentar perfiles de riesgo, antecedentes de consumo y problemas regulatorios muy diferentes. Al no existir definiciones precisas podría conyugar a exigencia de estudios o requisitos costosos e innecesarios para productos que la población ya consume. 2. La importancia de evitar duplicaciones o inconsistencias con textos y trabajos ya existentes en el Codex. Antes de iniciar un nuevo trabajo horizontal, sería conveniente identificar con mayor precisión cuáles son las brechas normativas concretas y por qué no podrían ser abordadas mediante principios generales ya existentes. 3. La necesidad de preservar el mandato propio del Codex, centrado en la protección de la salud de los consumidores y en las prácticas leales en el comercio de alimentos. En ese sentido, las referencias a sostenibilidad, consideraciones éticas, enfoque "Una Salud" u otros factores legítimos deberían ser evaluadas con especial cuidado, para evitar que el nuevo trabajo derive hacia debates que excedan el mandato técnico de la organización. DIGESA, considera que el Codex no es el foro competente para resolver debates éticos sobre el bienestar animal o la soberanía alimentaria, ya que para ello existen otros organismos internacionales especializados (como la FAO, la OMS o la OMSA). 4. Los productos tradicionales en algunos países o regiones podrían ser considerados "nuevos" en otros mercados. Ello podría dar lugar a autorizaciones previas, requisitos de etiquetado, evaluaciones adicionales o sistemas de vigilancia posmercado que generen cargas desproporcionadas para países en desarrollo, pequeños productores o alimentos con historial de consumo seguro en la región. La DIGESA, comparte esta preocupación por el riesgo de que las directrices sobre Nuevas Fuentes de Alimentos (NFPS) se apliquen de forma indiscriminada a productos tradicionales que son considerados "nuevos" únicamente por razones geográficas en mercados de destino, imponiéndose evaluaciones adicionales que eleven costos a alimentos con historial de consumo seguro. 	
<p>General Comment: Saudi Arabia welcomes continued discussion on this important and evolving area, noting the ongoing efforts across different Codex committees to address matters related to new food sources and new production systems, in a manner that supports innovation while maintaining food safety and consumer protection.</p>	<p>Saudi Arabia</p>
<p>General comment: The United Kingdom welcomes the EU's proposal and recognises the importance of developing an approach to risk analysis that addresses the challenges associated with new food sources and production systems (NFPS). The UK is still consulting internally but offers the below initial observations to support further discussion.</p>	<p>United Kingdom</p>
<p>1. Resumen ejecutivo</p> <p>La propuesta de la Unión Europea plantea que el Codex inicie un nuevo trabajo horizontal para desarrollar principios de análisis de riesgos aplicables a nuevas fuentes de alimentos y nuevos sistemas de producción (NFPS). El planteo parte de una preocupación legítima: la innovación alimentaria avanza con rapidez, los marcos regulatorios nacionales son desiguales y algunas autoridades pueden requerir orientación técnica para evaluar productos o procesos novedosos. Sin embargo, esa preocupación no basta por sí sola para justificar la aprobación inmediata del nuevo trabajo en los términos propuestos.</p> <p>El principal problema es que la propuesta combina, bajo una categoría todavía imprecisa, realidades muy diversas: carne cultivada, ingredientes derivados de fermentación, alternativas vegetales, algas, insectos comestibles, alimentos impresos en 3D, microalgas y otros productos o tecnologías que podrían incorporarse en el futuro. Esa amplitud vuelve</p>	<p>Uruguay</p>

difícil determinar qué productos quedarían comprendidos, qué riesgos serían realmente comunes, qué brechas normativas existen y qué órgano del Codex tendría competencia técnica e institucional para conducir el trabajo.

Además, la propuesta introduce referencias a sostenibilidad, consideraciones éticas, enfoque “Una Salud”, consideraciones que catalogan como factores legítimos, transformación de sistemas alimentarios y vigilancia posterior a la comercialización. Aunque algunos de esos elementos pueden ser relevantes en debates nacionales, su incorporación en un texto horizontal del Codex puede tensionar el mandato central de la organización, que es proteger la salud de los consumidores y asegurar prácticas leales en el comercio de alimentos. La sostenibilidad está mencionada en el Plan Estratégico del Codex 2026-2031, pero ello no convierte automáticamente a la sostenibilidad, las preocupaciones éticas o los modelos productivos en fundamentos suficientes para iniciar un nuevo trabajo normativo. Desde una perspectiva de CCLAC y de países en desarrollo, el riesgo más sensible es que productos tradicionales en una región sean tratados como “nuevos” en otros mercados y queden sometidos a autorizaciones previas, evaluaciones de alimentos completos, requisitos de etiquetado o monitoreo posmercado. En la práctica, un documento concebido para facilitar la armonización podría terminar legitimando nuevas barreras técnicas al comercio, especialmente contra países con menor capacidad científica, presupuestal y regulatoria.

Por estas razones, la posición más prudente no es desconocer la relevancia del tema, sino no apoyar todavía la aprobación del nuevo trabajo en su formulación actual. Correspondería solicitar una etapa preparatoria adicional, con una delimitación más precisa del alcance, una clasificación de los distintos tipos de NFPS, una brecha normativa demostrada por categoría, una evaluación del riesgo de duplicación con textos y comités existentes, y un análisis específico de los impactos sobre países en desarrollo y sobre alimentos tradicionales o regionales.

2. Tesis de posición sugerida

La posición sugerida puede formularse del siguiente modo:

El Codex debería tomar nota de la relevancia de las nuevas fuentes de alimentos y nuevos sistemas de producción, así como de la conveniencia de continuar intercambiando información técnica y regulatoria sobre el tema. No obstante, la propuesta de nuevo trabajo presentada por la Unión Europea no debería aprobarse en sus términos actuales, porque no delimita con suficiente precisión el alcance del concepto NFPS, no demuestra de manera suficientemente específica las brechas normativas que justificarían un nuevo texto horizontal, puede duplicar o tensionar trabajos existentes, incorpora dimensiones que exceden o desdibujan el mandato del Codex, y podría generar cargas regulatorias desproporcionadas o barreras técnicas al comercio para países en desarrollo y para productos tradicionales de determinadas regiones.

3. Contenido esencial de la propuesta europea

La propuesta se presenta como un trabajo horizontal destinado a desarrollar principios de análisis de riesgos para NFPS, abarcando evaluación del riesgo, gestión del riesgo y comunicación del riesgo. La Unión Europea sostiene que los principios generales existentes, en particular CXG 62-2007, serían demasiado generales para atender las particularidades de estos productos y sistemas, y que CXG 44-2003, aunque ofrece un antecedente, se limita a alimentos derivados de la biotecnología moderna.

El documento propone cubrir definiciones, ausencia de historial de consumo seguro, evaluación de alimentos completos, diferenciación entre alimentos tradicionales en una región y nuevos en otra, requisitos regulatorios, autorizaciones previas, notificaciones, etiquetado, vigilancia posterior a la comercialización, procesos y tecnologías de producción, monitoreo, enfoque “Una Salud”, otros factores legítimos e intercambio internacional de información.

El alcance propuesto comprende alimentos o ingredientes que no hayan sido consumidos en grado significativo a nivel nacional o regional, sea porque su consumo estuvo históricamente limitado a ciertas regiones, sea porque ingresaron recientemente al mercado global por innovaciones tecnológicas. La propuesta excluye procesos que no alteren las características intrínsecas del alimento, pero deja para el propio trabajo futuro la definición exacta de “nuevos alimentos”, “nuevas fuentes de alimentos” o “nuevos sistemas de producción”.

<p>4. Mapa sintético de argumentos críticos</p> <p>Por limitaciones del formato de carga de comentarios, el cuadro incluido en el documento de comentarios elaborado por Uruguay se transmite a continuación en formato de listado estructurado, manteniendo su contenido sustantivo y el mismo orden de análisis: eje crítico, argumento central, riesgo principal y respuesta sugerida.</p> <p>a. Alcance y definiciones</p> <p>Argumento central: La categoría NFPS es demasiado amplia y todavía no está estabilizada. Agrupa productos, ingredientes, procesos y tecnologías con riesgos muy distintos.</p> <p>Riesgo principal: Mandato elástico, difícil de conducir y susceptible de expansión progresiva.</p> <p>Respuesta sugerida: No iniciar el trabajo hasta contar con una clasificación clara y definiciones operativas.</p> <p>b. Necesidad del nuevo trabajo</p> <p>Argumento central: La propuesta invoca incertidumbre y diversidad regulatoria, pero no demuestra brechas normativas concretas por categoría.</p> <p>Riesgo principal: Aprobación de un trabajo horizontal sin base suficiente en los criterios de prioridad del Manual de Procedimiento.</p> <p>Respuesta sugerida: Exigir una brecha demostrada producto por producto o categoría por categoría.</p> <p>c. Mandato Codex</p> <p>Argumento central: Las referencias a sostenibilidad, ética, Una Salud y factores legítimos pueden desdibujar el mandato del Codex.</p> <p>Riesgo principal: Desplazamiento desde inocuidad y prácticas leales hacia debates políticos sobre modelos productivos.</p> <p>Respuesta sugerida: Limitar cualquier trabajo a inocuidad y prácticas leales, excluyendo criterios ambientales o éticos ajenos al mandato.</p> <p>d. Comercio regional</p> <p>Argumento central: Un alimento tradicional en CCLAC podría ser considerado “nuevo” para otro mercado importador.</p> <p>Riesgo principal: Autorizaciones, etiquetado o evaluaciones adicionales para productos con historial de consumo seguro en la región.</p> <p>Respuesta sugerida: Incluir una salvaguardia expresa para alimentos tradicionales y evidencia de uso seguro regional.</p> <p>e. Capacidad técnica</p> <p>Argumento central: La evaluación de alimentos completos y tecnologías complejas puede exigir recursos científicos altos.</p> <p>Riesgo principal: Carga desproporcionada para países en desarrollo, pequeñas empresas y productores tradicionales.</p> <p>Respuesta sugerida: Incorporar análisis de impacto para países en desarrollo antes de aprobar el nuevo trabajo.</p> <p>f. Gobernanza Codex</p> <p>Argumento central: No está claro qué comité debería liderar el trabajo.</p> <p>Riesgo principal: Riesgo de duplicación, fragmentación o tratamiento insuficiente de dimensiones técnicas distintas.</p> <p>Respuesta sugerida: Remitir previamente al Comité sobre Principios Generales o solicitar una etapa preparatoria.</p> <p>5. Desarrollo de los argumentos</p> <p>5.1. Insuficiente delimitación del concepto NFPS</p>	
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El primer problema es conceptual. La propuesta usa la expresión “nuevas fuentes de alimentos y nuevos sistemas de producción” como si designara una categoría suficientemente homogénea, pero en realidad agrupa situaciones de naturaleza muy distinta. No es lo mismo evaluar una especie vegetal tradicional en una región y nueva para otra, un ingrediente derivado de fermentación, una carne cultivada, un insecto comestible, una microalga o un alimento impreso en 3D. Cada categoría presenta perfiles de riesgo, trayectorias regulatorias, antecedentes de consumo, exigencias analíticas y problemas comerciales diferentes.

Esta heterogeneidad debilita la idoneidad de un texto horizontal. Un principio excesivamente general puede repetir lo que ya dicen los textos existentes; un principio demasiado específico puede resultar inadecuado para varias categorías; y un principio flexible en exceso puede terminar habilitando interpretaciones divergentes. La propuesta reconoce que no existe una definición internacional aceptada y que algunos productos pueden ser tradicionales en determinados países o regiones, pero traslada la solución de esa dificultad al propio trabajo futuro. Ese enfoque invierte el orden lógico: antes de aprobar el nuevo trabajo debería saberse con precisión qué se pretende regular y por qué.

La consecuencia institucional es relevante. Si el alcance no está claro, tampoco pueden evaluarse adecuadamente la necesidad, la duplicación, la prioridad, el órgano competente ni los impactos para los países miembros. Por tanto, la falta de definiciones no es un problema menor de redacción, sino una debilidad central de la propuesta.

5.2. La necesidad del nuevo trabajo no está suficientemente demostrada

La propuesta sostiene que CXG 62-2007 es demasiado general y que CXG 44-2003 cubre solo alimentos derivados de la biotecnología moderna. Sin embargo, esa afirmación no basta para demostrar una brecha normativa que justifique un nuevo texto horizontal. El hecho de que un texto existente sea general no implica que sea insuficiente; del mismo modo, la existencia de diversidad regulatoria nacional no prueba por sí sola la necesidad de una nueva norma internacional.

La brecha debería demostrarse de manera más rigurosa. Sería necesario identificar qué tipos concretos de NFPS no pueden ser abordados mediante los principios generales de análisis de riesgos, qué riesgos específicos no están cubiertos por los textos actuales, qué problemas de comercio o de protección de la salud se han producido, y por qué esos problemas no pueden resolverse mediante orientaciones interpretativas, actualización de textos existentes o trabajos sectoriales en comités especializados.

La propuesta se apoya en una lógica preventiva amplia: como las tecnologías avanzan y los marcos nacionales son dispares, el Codex debería anticiparse. Esa lógica puede ser razonable para promover intercambio de información, vigilancia técnica o recopilación de experiencias, pero no alcanza necesariamente para aprobar un nuevo trabajo normativo. El Manual de Procedimiento exige evaluar prioridades, necesidad, magnitud del problema, aptitud para la normalización y relación con trabajos existentes. En este caso, esos elementos todavía aparecen formulados de manera general.

5.3. Riesgo de duplicación con textos y comités existentes

El Codex ya cuenta con principios generales de análisis de riesgos para gobiernos y con textos específicos aplicables a distintos ámbitos: aditivos, contaminantes, residuos de medicamentos veterinarios, residuos de plaguicidas, higiene, nutrición, etiquetado, inspección y certificación, biotecnología moderna y determinados productos. La propia propuesta reconoce esa arquitectura, pero no demuestra suficientemente por qué un texto horizontal adicional sería preferible a trabajos más acotados en los comités competentes.

En varios ejemplos mencionados por la propuesta, los problemas identificados podrían corresponder a comités distintos: alergenicidad, higiene de producción, contaminantes, etiquetado, aditivos, métodos de análisis, nutrición o inspección. Agrupar todos esos aspectos bajo un texto horizontal sobre NFPS puede generar solapamientos, duplicaciones y tensiones entre comités. Además, podría crear una capa normativa adicional que conviva de manera incierta con textos ya aplicables.

Una respuesta más prudente sería pedir que, antes de iniciar un nuevo trabajo, se elabore una matriz de brechas por categoría de producto y por comité competente. Esa matriz debería distinguir entre problemas ya cubiertos, problemas cubiertos parcialmente,

<p>problemas abordables mediante actualización de textos existentes y verdaderas lagunas que requieran un nuevo instrumento.</p> <p>5.4. Posible expansión del mandato del Codex</p> <p>Uno de los puntos más sensibles es la incorporación de referencias a sostenibilidad, transformación de sistemas alimentarios, enfoque Una Salud, consideraciones éticas y otros factores legítimos. Es cierto que el Plan Estratégico del Codex 2026-2031 menciona desafíos globales y reconoce la necesidad de que el Codex actúe en un entorno cambiante. Pero esa referencia estratégica no transforma automáticamente a la sostenibilidad, la ética o la legitimidad de modelos productivos en materias propias de un nuevo trabajo normativo del Codex.</p> <p>El mandato del Codex se centra en proteger la salud de los consumidores y asegurar prácticas leales en el comercio de alimentos. Si un texto sobre NFPS incorpora factores ambientales, éticos o de sostenibilidad de manera abierta, el debate puede desplazarse desde la inocuidad hacia cuestiones de política pública más amplias, donde existen otros foros internacionales con competencia directa. Esto puede politizar indebidamente un trabajo técnico y abrir discusiones sobre qué tecnologías son deseables, qué modelos productivos deben promoverse, o qué alimentos son cultural o ambientalmente aceptables.</p> <p>El riesgo no es solo teórico. Un texto internacional que combine análisis de riesgos con sostenibilidad, ética, Una Salud y factores legítimos podría ser utilizado por algunos países para justificar requisitos regulatorios más amplios que los estrictamente necesarios para proteger la salud o evitar prácticas engañosas. Por ello, cualquier consideración no estrictamente vinculada a inocuidad o prácticas leales debería quedar excluida o claramente subordinada al mandato del Codex.</p> <p>5.5. Riesgo para alimentos tradicionales y comercio regional</p> <p>La propuesta reconoce que un alimento puede ser tradicional en una región y nuevo en otra. Sin embargo, esa distinción no queda suficientemente protegida. Desde la perspectiva de CCLAC, este punto es crítico. América Latina y el Caribe producen y consumen alimentos, ingredientes, especies, extractos, algas u otros productos con tradición regional que pueden no ser ampliamente consumidos en otras regiones. Si el criterio de novedad se define desde el mercado importador, esos productos podrían ser tratados como nuevos aunque tengan historial de consumo seguro en su región de origen.</p> <p>Esto podría generar efectos comerciales adversos. Un país importador podría exigir autorizaciones previas, evaluaciones de alimentos completos, evidencia toxicológica adicional, requisitos de etiquetado o vigilancia posmercado para productos que no son nuevos desde la perspectiva del país productor. En lugar de facilitar el comercio, el texto podría legitimar nuevas barreras técnicas, especialmente contra exportadores de biodiversidad alimentaria, productores tradicionales o pequeñas empresas que no tienen capacidad para producir expedientes científicos complejos.</p> <p>La protección de alimentos tradicionales debería ser una condición previa para cualquier avance. Si se considerara continuar el proceso, el texto debería reconocer expresamente que el historial de consumo seguro en una región o país productor debe ser un elemento central de la evaluación, y que la novedad en el país importador no puede, por sí sola, justificar requisitos desproporcionados.</p> <p>5.6. Carga técnica y presupuestal desproporcionada para países en desarrollo</p> <p>La propuesta menciona la evaluación de alimentos completos, ausencia de historial de consumo seguro, procesos y tecnologías de producción, monitoreo posterior a la comercialización y revisión periódica de los componentes del análisis de riesgos. Estos elementos pueden ser técnicamente razonables para ciertos productos altamente novedosos, pero también pueden exigir capacidades científicas, laboratorios, expertos, datos, métodos validados y presupuestos que muchos países en desarrollo no tienen disponibles.</p> <p>El problema es doble. Por un lado, los países con menor capacidad regulatoria podrían quedar presionados a adoptar marcos complejos para no apartarse de una referencia Codex. Por otro lado, sus productores podrían enfrentar mayores exigencias en mercados externos, especialmente si el texto es utilizado como base para pedir información adicional o autorizaciones previas. La propuesta presenta el intercambio internacional de información</p>	
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<p>como una forma de apoyar a países con menos recursos, pero ese mecanismo no elimina el costo de implementar, interpretar y cumplir un marco sofisticado.</p> <p>En consecuencia, antes de aprobar el nuevo trabajo debería realizarse un análisis específico de impacto en países en desarrollo. Ese análisis debería evaluar costos regulatorios, necesidades de asistencia técnica, disponibilidad de datos, impacto sobre pequeños productores, efectos sobre comercio regional y riesgo de creación de barreras técnicas.</p> <p>5.7. Riesgo de convertir herramientas excepcionales en expectativas generales</p> <p>Autorizaciones previas, notificaciones, etiquetado específico, monitoreo posmercado y vigilancia pueden ser herramientas legítimas cuando existe un riesgo identificado o una incertidumbre relevante. Sin embargo, un texto horizontal sobre NFPS podría convertir esas herramientas en expectativas regulatorias generales para cualquier producto que entre dentro de la categoría. Esa transformación sería problemática.</p> <p>El Codex debería evitar que la categoría NFPS opere como una presunción de riesgo. No todo producto nuevo para un mercado es intrínsecamente riesgoso; no toda innovación tecnológica altera la inocuidad; no todo alimento tradicional de una región requiere expediente completo en otra; y no toda diferencia nutricional o tecnológica justifica etiquetado especial. El análisis debe ser proporcional, basado en evidencia y ligado a riesgos concretos.</p> <p>Por ello, si el tema avanzara, debería quedar claro que las medidas de gestión de riesgos no son automáticas. Deben estar justificadas por una evaluación específica, ser proporcionales al riesgo, tomar en cuenta el historial de consumo seguro disponible y evitar restricciones innecesarias al comercio.</p> <p>5.8. Problema de gobernanza: órgano competente y secuencia procedimental</p> <p>La propia Carta Circular pregunta qué órgano auxiliar sería más apropiado para realizar el trabajo. Esa pregunta muestra que el diseño institucional todavía no está resuelto. Si el trabajo se asigna a un comité de inocuidad, puede quedar débil el tratamiento de etiquetado y prácticas leales; si se asigna a etiquetado, puede quedar insuficientemente abordada la evaluación de riesgos; si se asigna a un comité de productos, el enfoque puede ser parcial; y si se crea una estructura especial, se abren preguntas sobre recursos, prioridades y gobernanza.</p> <p>Por esa razón, no parece conveniente aprobar el nuevo trabajo antes de resolver la arquitectura institucional. Una alternativa razonable sería remitir el asunto al Comité sobre Principios Generales para que analice la pertinencia, el mandato, la forma del posible instrumento y su relación con los textos existentes. Otra opción sería solicitar a la Secretaría y a los comités pertinentes una etapa de mapeo previo, sin iniciar todavía un trabajo normativo formal.</p> <p>El punto de fondo es que una propuesta horizontal requiere una justificación institucional más robusta que una propuesta sectorial. Cuanto más transversal es el tema, mayor debe ser la claridad sobre alcance, competencia, coordinación y prevención de duplicaciones.</p> <p>5.9. Riesgo de sesgo hacia agendas tecnológicas o regulatorias de mercados desarrollados</p> <p>La propuesta europea parte de preocupaciones regulatorias reales, pero también refleja el tipo de debates que predominan en mercados con alta capacidad técnica, empresas innovadoras, marcos de autorización previa y fuerte desarrollo de tecnologías alimentarias emergentes. Ese punto no invalida la propuesta, pero exige cautela. Un estándar internacional construido desde esos supuestos puede no responder a las prioridades de países cuya principal preocupación es preservar el acceso a mercados para productos tradicionales, fortalecer capacidades básicas de inocuidad o evitar requisitos técnicos que no agregan protección sanitaria real.</p> <p>El Codex debe evitar que una agenda de innovación tecnológica se transforme en un marco regulatorio global que termine beneficiando a quienes ya cuentan con capacidad para producir expedientes técnicos complejos. La armonización no siempre reduce barreras: si el estándar internacional fija expectativas altas, puede consolidar ventajas de los actores con mayor capacidad regulatoria y tecnológica.</p>	
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<p>Por ello, cualquier discusión futura debería incorporar explícitamente la perspectiva de países en desarrollo, productores tradicionales, alimentos regionales, comercio Sur-Sur y capacidades regulatorias diferenciadas.</p>	
<p>The United States thanks the EU for their efforts to revise and update this paper following the discussions at CAC48. Nevertheless, the United States continues to seek clarity on the scope of this proposal and does not consider that new work at this stage is justified. In particular, the United States has concerns that:</p> <ul style="list-style-type: none"> - The proposal does not account for the broad and varied nature of NFPS as a category, which comprises myriad foods and production processes, and the fact that most, if not all, of the specific risks associated with certain NFPS can already be addressed using Codex's existing risk analysis principles applicable to all foods. - The proposal includes foods that have a long history of safety and traditional consumption in some regions but may be new in another region. It promotes the application of risk analysis principles by governments to these foods, but not others, on the basis of consumption behavior rather than risk profile. We have strong concerns that this not only contradicts Codex's risk-based approach, but also introduces the potential for trade barriers without a clear benefit to consumer health, undermining Codex's mandate. - The proposed new work is not limited to topics relevant to the key Codex principles of food safety and fair trade. The United States emphasizes that issues of animal welfare, environmental health, and sustainability, especially as justification to take up work on NFPS, are out of scope for Codex and run the risk of prejudicing work in other international organizations. <p>For these reasons and the explanations detailed below, the United States believes the new work proposal should not be approved by CAC49.</p>	<p>USA</p>
<p>The Good Food Institute (GFI) expresses its appreciation to the EU for preparing this new work proposal and drawing attention to the category of new food sources and production systems as increasingly important in the ongoing necessary transformation of food systems. In particular, we appreciate the recognition throughout the proposal that Codex work on NFPS should be viewed as both a response to current regulatory gaps AND a contribution to promote innovation for more resilient global food systems.</p> <p>However, given the breadth and diversity of NFPS, it is unclear whether a single set of risk analysis principles could be developed that is equally relevant to foods considered traditional in some regions but new in others, as well as to cell-cultivated foods, plant-based foods, fermentation-enabled foods, seaweed, insects, microalgae, 3D-printed foods, and any other NFPS that may ultimately be included within the definition. Attempting to create principles broad enough to encompass all of these categories may result in guidance that is too general to meaningfully support global harmonization of their regulation.</p> <p>GFI also notes that while broad principles related to transparency in labeling, food safety, and nutritional considerations may be appropriately addressed through risk analysis principles, specific labeling, safety, and nutritional aspects of individual categories of NFPS should be addressed in the appropriate committees (CCFA, CCFH, CCFL and CCNFSU).</p>	<p>Good Food Institute</p>
<p>The International Dairy Federation (IDF) appreciates the opportunity to provide comments on the proposal to develop principles for the risk analysis of new food sources and production systems (NFPS).</p> <p>IDF recognises that the rapid development of new food sources and novel production technologies is increasingly attracting attention at both national and international levels. As it was rightly noted, these developments raise questions in relation to risk assessment, food safety, labelling, consumer protection, and regulatory approaches. At the same time, IDF considers that any work in this area must remain firmly anchored in the core Codex mandate of protecting public health and ensuring fair practices in food trade, and must not be used to promote any specific food technology, food source, or production approach over conventional sources.</p> <p>In reviewing the current proposal, IDF considers that while the topic is relevant and evolving, the justification for initiating new overarching Codex principles has not yet been sufficiently demonstrated. Consistent with earlier IDF submissions, including responses to previous circular letters on NFPS, IDF has not identified clear examples where existing Codex structures and procedures are unable to address emerging issues. On the contrary, the</p>	<p>IDF/FIL</p>

<p>Codex system already provides a comprehensive framework through its general risk analysis principles and committee-specific work, which can be adapted as needed. In particular, existing texts such as the Working Principles for Risk Analysis (CXG 62-2007) already provide a solid foundation for addressing many of the concerns outlined in the proposal</p> <p>A key concern relates to the scope of the proposed work, which remains insufficiently defined. As recognised in Codex discussions, the term NFPS covers a highly diverse range of products and processes, including genuinely novel foods, foods with a history of use in certain regions, and products derived from new or modified production technologies. These categories raise fundamentally different regulatory and risk assessment questions. IDF, therefore, emphasises the importance of clearly distinguishing between “new foods” and “new production systems”, as well as between products and processes, before developing any overarching guidance. Without this clarity, there is a risk that the resulting principles could be either too broad to be meaningful or too complex to be applied consistently.</p> <p>IDF also underlines the importance of ensuring full coherence with existing Codex standards. In particular, IDF reiterates the importance of ensuring that labelling principles remain aligned with existing Codex labelling standards and guidelines, which seek to prevent consumer confusion. As noted in previous IDF submissions, the use of terminology that may suggest equivalence or similarity to existing products could be misleading and would need to be evaluated for consistency with established standards.</p> <p>In the context of dairy, IDF would strongly oppose any attempt to define or label any finished products that do not contain dairy as milk or milk products as this would be inconsistent with both the spirit and terms of the General Standard for the Use of Dairy Terms (CXS 206-1999). The GSUDT plays a critical role in protecting consumers from misleading practices and ensuring fair competition in the marketplace.</p> <p>Established in 1999, the GSUDT establishes clear guidance on the correct use of terms which are universally identified with dairy products. The GSUDT defines milk as “the normal mammary secretion of milking animals obtained from one or more milkings without either addition to it or extraction from it, intended for consumption as liquid milk or further processing.” If new work is initiated on new food sources, this definition and other core principles of CXS 206-1999 must be incorporated and not undermined. As the marketplace evolves and new products seek to replicate or substitute traditional foods, maintaining consistency with legacy Codex standards becomes even more essential.</p> <p>IDF also emphasises the importance of careful consideration of terminology and definitions more generally if this work is undertaken. The absence of internationally agreed definitions for NFPS is already recognised as a challenge. In this regard, the development of terminology should be approached with caution to avoid creating confusion or inconsistencies across Codex texts or national frameworks. Particular attention should be paid to terms related to fermentation-derived ingredients, where different interpretations may have significant regulatory implications both within and beyond the dairy sector.</p> <p>From a practical perspective, IDF questions whether a single horizontal set of principles would be sufficiently effective, given the heterogeneity of NFPS. The proposal itself highlights that these products may lack a history of safe use, may involve assessment of whole foods rather than individual hazards, and may require different regulatory interventions depending on the context. IDF considers that these challenges are likely to be best addressed within the existing committee structure, where subject-matter expertise is already available, rather than through the development of a broad, one-size-fits-all framework.</p>	
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SPECIFIC COMMENTS

<p>Whether the new work proposal satisfies the criteria for the establishment of work priorities specified in Section 2.3 of the <i>Codex Procedural Manual</i>. Due consideration should be given to whether the need for such work is clearly described and justified. See in particular Section 5 of the project document.</p>	
It is desirable to add the following	Algeria
<ul style="list-style-type: none"> The new work proposal presents information that was collected in 2022 by a CCEXEC subcommittee on the NFPS landscape and potential food safety and regulatory challenges. 	Australia

<p>This was very much a broad information gathering exercise, as the intent was to canvass all possible issues that Codex might need to be able to address in the future. The purpose of the consultation was largely to determine if Codex structures were fit for purpose. As such the CL process at the time was crafted with questions that would gather large scale feedback on any and all possible considerations to allow a gap analysis of Codex processes and structures.</p> <ul style="list-style-type: none"> • We have looked carefully at the information provided and tried to consider where additional risk analysis principles might help, but it is not clear how they would address the potential issues raised through the 2022 CL process. The potential issues raised relate specifically to certain commodities, and there is no evidence that additional high-level principles broadly applicable to all NFPS would be helpful. • The proposal doesn't identify gaps in international regulatory approaches that are being applied in practice right now. Regulators are approving NFPS in their systems and they are collaborating on issues internationally. These realities don't appear to have been explored in the new work proposal. 	
<p>Canada does not believe that the proposed work is clearly described nor fully justified. Canada is of the view that the scope is overly broad, covering too wide of a range of products with differing levels of risk and complexity. The proposal lacks clarity on what products the resulting principles would apply to and may include traditional foods or established products. Capturing an overly broad range of products could lead to potential overregulation that would not be aligned with a risk-based approach. As well, it does not adequately identify what gaps, if any, were found from existing Codex risk analysis principles texts and frameworks.</p>	Canada
<p>1. Necesidad e idoneidad del nuevo trabajo propuesto.</p> <p>Chile considera que el tema es relevante por dos razones:</p> <p>1) Creemos podrían existir diferencias en el abordaje del análisis de riesgos, particularmente en la evaluación de riesgos por ej. por la falta de historial de consumo seguro y el conocimiento limitado existente sobre los riesgos potenciales en alimentos innovadores; en la gestión de riesgos por ej, por la aprobación pre-mercado y una vigilancia adecuada una vez aprobados y comercializados estos alimentos; y en comunicación de riesgos (por ej, la palabra cultivada se ocuparía indistintamente para leche "cultivada" y carne "cultivada" siendo procesos absolutamente distintos. Además, puede apoyar el abordaje de los componentes de análisis de riesgos en las regulaciones implementadas por los países, por ejemplo, Chile recientemente realizó una propuesta de modificación regulatoria para los NFPS, para evaluar y aprobar este tipo de alimentos sin historial de consumo seguro.</p> <p>Sin embargo, se debe aclarar varios aspectos de la propuesta, para que limiten su alcance, diferenciando los alimentos verdaderamente novedosos de aquellos con historial de consumo seguro en otras regiones del mundo.</p>	Chile
<p>Costa Rica considers that the proposal for new work does not fully satisfy the criteria established in Section 2.3 of the Codex Procedural Manual, specifically regarding the "Criteria applicable to commodities," item (a), which requires demonstrating the volume of production and consumption in individual countries and volume and patterns of trade between countries.</p> <p>Justification: The project document itself (Appendix II, section 5.e) explicitly acknowledges the current absence of consolidated, real-world trade data on New Food Sources and Production Systems (NFPS). Instead, it bases the global magnitude of the issue on a "foresight exercise" with a likelihood of emergence over a 5 to 15-year horizon. In the view of Costa Rica, this timeframe should ideally be utilized to prioritize the urgent and tangible needs of current international trade. Rather than developing guidelines based on assumptions and future scenarios, the Commission's global efforts should focus on resolving the actual bottlenecks currently faced by our producers, thereby building a solid regulatory foundation before jumping ahead to unestablished market developments.</p>	Costa Rica
<p>Egypt supports, in principle, the development of general principles for the risk analysis of NFPS. Such work may contribute to consumer health protection, fair practices in food trade, and assist Members in developing science-based national regulatory frameworks for emerging food products and technologies.</p> <p>Egypt considers that the proposed new work satisfies the criteria for the establishment of work priorities under the Codex Procedural Manual. The proposal is justified from the perspectives of consumer protection, food safety, and fair practices in food trade, while also addressing the</p>	Egypt

<p>increasing diversification of national regulatory approaches and the potential impact on international trade.</p> <p>Egypt emphasizes that many developing countries are still in the process of adapting their regulatory frameworks to address NFPS. The proposed work could therefore provide useful guidance, support greater regulatory consistency, and facilitate the safe introduction of innovative food products while maintaining appropriate levels of consumer protection.</p>	
<p>Need for and suitability of the proposed new work</p> <p>i) Whether the new work proposal satisfies the criteria for the establishment of work priorities specified in Section 2.3 of the Codex Procedural Manual. Due consideration should be given to whether the need for such work is clearly described and justified. See in particular Section 5 of the project document.</p> <p>We do think that the general intent of the proposal is in line with the criteria for the establishment of work priorities as outlined in Section 2.3 of the Codex Procedural Manual.</p> <p>4.2 Consumer protection from the point of view of health, food safety, ensuring fair practices in food trade and taking into account the identified need so developing countries.</p> <p>There is a real risk that in the absence of adequate guidance or an adequately elaborated regulatory framework, the regulations for these emerging technologies will not be globally harmonised and become trade barriers.</p> <p>We are encouraged to see the proposed dialogue on global harmonisation and exchange of information including the consideration of recognition of the risk assessments from competent authorities being globally recognised.</p> <p>As noted in our General Comments, we do think that the proposal would benefit from being more focused. This would lead to earlier completion of the work as well as reduced resource use of Codex as well.</p> <p>The proposal doesn't identify gaps in international regulatory approaches that are being applied in practice right now. Regulators are approving NFPS in their systems and they are collaborating on issues internationally. These realities don't appear to have been explored in developing the new work proposal.</p>	New Zealand
<p>We consider that the proposed new work satisfies the criteria for the establishment of work priorities as set out in Section 2.3 of the Codex Procedural Manual. The need for this work is clearly described and well justified; it also demonstrates its potential to contribute to greater consistency and harmonization across countries. On this basis, the proposal is considered to meet the relevant criteria.</p>	Norway
<p>Saudi Arabia considers that the proposal broadly satisfies the criteria for the establishment of work priorities. The need for the work is sufficiently justified, particularly given the rapid development of NFPS, the varying levels of regulatory experience among Members, and the potential value of harmonized, science-based risk analysis principles to support national regulatory frameworks.</p>	Saudi Arabia
<p>Sudan support developing NFPS risk analysis principles which is fully aligned with the principles and criteria established in the Codex Procedural Manual, including the protection of consumer health, the assurance of food safety, and the promotion of fair practices in the food trade, while taking into account the needs of developing countries.</p> <p>Preference will be given to proposals that demonstrate alignment with the divarication of national legislation, international trade</p>	Sudan
<p>The United Kingdom recognises that new food sources and production systems (NFPS) represent an evolving and increasingly important area for food safety authorities, and acknowledges the rationale set out in the proposal. The challenges associated with the absence of a history of safe use, the diversity of products and processes, and the need for appropriate risk analysis approaches are clearly identified.</p> <p>The UK considers that the proposal broadly aligns with the criteria for the establishment of work priorities set out in the Codex Procedural Manual, particularly in relation to consumer protection, international harmonisation, and emerging global developments. The UK notes that, rather than widespread divergence of national legislation at present, there is often an</p>	United Kingdom

absence of established frameworks, creating a risk of future fragmentation and the emergence of trade barriers that are not grounded in scientific principles.	
The United States does not consider that the proposed new work is clearly described nor justified. In particular, the United States continues to seek clarity on the scope of the proposal which we believe is overly broad and would open the possibility of trade barriers without clear consumer health benefit. We also question the proposal to develop harmonized definitions for 'new foods' or 'new production systems' when doubts remain as to what would constitute 'new' and how such definitions would be applied in a risk management context. Further, the justification for the proposed new work remains unclear as the proposal does not identify which risks, applicable across all NFPS, would not be able to be addressed using existing Codex mechanisms and risk analysis principles.	USA
<p>FIA agrees that the new work proposal satisfies the criteria for establishment of work priorities. Establishing an international framework for risk analysis will provide direction for markets with concern on NFPS regarding their safety assessments, while ensuring room for innovation. While national regulations for general foods are well-established, there is little research done on NFPS. These Codex principles of risk analysis could reduce safety issues present in NFPS, allowing more trust and interest in them.</p> <p>However, FIA would like to highlight the ongoing discussion paper on the risk assessment of cell culture media components in the Codex Committee on Food Additives. Cell-cultured products are also considered novel food products. There should be a clear distinction established between these works. Moreover, clarity should be provided if NFPS includes genetically modified (GM) foods. This is because GM foods could be considered a novel food in some markets (e.g. Israel, Canada, Singapore).</p> <p>In terms of existing work, FIA would like to propose the inclusion of FAO's reports on precision fermentation (https://openknowledge.fao.org/items/527bf0bc-8d7e-4fef-8ce0-cad2c3b01a18) and cell-based foods (https://www.who.int/publications/i/item/9789240070943). Since insect products have already been included, reports on other novel foods should also be included.</p>	Food Industry Asia
Whether there is a clear link between the proposed new work and the goals of the Codex Strategic Plan 2026–2031. See in particular Section 6 of the project document.	
<ul style="list-style-type: none"> Australia is supportive of Codex setting guidance related to new food sources and production systems (NFPS) (within a defined scope) where there is a clear case that a lack of harmonisation is leading to, or could lead to, food safety or trade issues. The new work proposal is not convincing of this. Therefore, it is our view that it could not appreciably contribute to the achievement of the strategic plan goals. 	Australia
<p>ii. Si existe un vínculo claro entre el nuevo trabajo propuesto y los objetivos del Plan Estratégico del Codex 2026-2031. Véase, en particular, la Sección 6 del documento del proyecto.</p> <p>Analizada la propuesta de la Unión Europea, en términos generales, a Chile le parece que reúne antecedentes que justifican su pertinencia, principalmente por qué:</p> <ul style="list-style-type: none"> Se alinea a los objetivos del Codex y el plan estratégico 2026-2031. Permitirá armonizar la diversidad de regulaciones de los países miembros respecto a este tema, lo que facilitará el comercio. La propuesta y el análisis de deficiencias presentado demuestran que los textos actuales de análisis de riesgos no abordan algunas particularidades que se desprenden de este tipo de alimentos en los 3 componentes. Sin embargo, el análisis de deficiencias considera también a aquellos alimentos que no son novedosos en ciertas regiones. Creemos el trabajo debe limitar su alcance, diferenciando los alimentos verdaderamente novedosos de aquellos con historial de consumo seguro en otras regiones del mundo. 	Chile
<p>Costa Rica notes with deep concern the cross-cutting references to "ethical concerns," "environmental aspects," and "sustainability" used to justify the relevance of this new work and its alignment with the Strategic Plan 2026-2031. While we acknowledge that these concepts appear within the broader context and discussions of the Strategic Plan, we do not consider them to be valid or appropriate elements for technical justification of this work.</p> <p>Justification: In accordance with the Statements of Principle Concerning the Role of Science in the Codex Decision-Making Process, the fundamental pillar for justifying and developing</p>	Costa Rica

any Codex standard or principle must always be rigorous scientific evidence focused exclusively on protecting human health and ensuring food safety. Institutionalizing and demanding environmental, ethical, or sustainability aspects in a cross-cutting manner creates a latent risk of converting them de facto into mandatory justification requirements. This would completely distort the strictly technical risk analysis nature that governs the Commission and could lead to the creation of disguised and unnecessary barriers to trade. Such matters fall under the sovereignty of individual states or international forums with specialized mandates (such as FAO, PNUMA, or WTO); therefore, Codex should refrain from systematically using them to justify new mandates.	
<p>Egypt agrees that the proposed work is aligned with the objectives of the Codex Strategic Plan 2026–2031, particularly with regard to addressing emerging food safety challenges, supporting science-based decision-making, protecting consumer health, and facilitating fair practices in food trade.</p> <p>The proposed work may also contribute to strengthening cooperation and information exchange among Members and relevant international organizations in areas related to innovative food production systems and emerging food safety considerations.</p>	Egypt
New Zealand is supportive of Codex setting guidance related to NFPS with a more refined scope. We think this is an important part of Codex being future proofed and providing the necessary framework ahead of a rapidly developing food system. Codex should be proving the frameworks to support innovation for more sustainable and resilient global food systems.	New Zealand
We also consider that there is a clear link between the proposed new work and the goals of the Codex Strategic Plan 2026–2031, especially for goal 1, 3 and 4 as described in the Project Document.	Norway
Saudi Arabia agrees that there is a clear link between the proposed work and the Codex Strategic Plan 2026–2031, particularly in relation to responding to emerging issues, supporting science-based standards, strengthening international cooperation, and enhancing the use of Codex texts in national food control systems.	Saudi Arabia
Sudan; Proposed new work is aligned with the objectives and strategic priorities of the Codex Strategic Plan 2026–2031, include facilitating fair trade in novel food products, the promotion of food safety and supporting the participation of developing countries in evolving food systems	Sudan
<p>The United Kingdom recognises a clear link between the proposed new work and the goals of the Codex Strategic Plan 2026–2031. The proposal aligns with the core role of Codex to maintain a focus on its statutory purpose while remaining proactive, flexible, and responsive to emerging food safety and quality challenges. The rapid development of new food sources and production systems (NFPS) illustrates the need for timely consideration.</p> <p>The UK notes the relevance of Strategic Goal 1, particularly the use of foresight and horizon scanning to anticipate emerging risks. Early consideration of NFPS could support a proactive approach, helping to avoid regulatory fragmentation and trade barriers not grounded in scientific principles.</p> <p>The proposal also supports Strategic Goal 4 by encouraging increased use of Codex standards as a benchmark for national approaches, promoting consistency and maximising global impact.</p>	United Kingdom
The United States appreciates the EU's efforts to explain the proposal in terms of the goals of the Codex Strategic Plan 2026-2031 in the project document. Nevertheless, given our concerns with the inclusion of foods that have a long history of safe and traditional consumption in some regions, it would seem that this proposal does not fully account for Members' needs (Strategic Goal 1) by opening the possibility of discrimination against regions producing such foods which would, under the parameters of this proposal, be subject to an additional set of risk analysis principles not applied to all other foods. Such limitations and/or barriers could negatively impact the visibility and use of standards derived from NFPS risk analysis principles (Strategic Goal 4). In addition, the United States is unsure that new work in this area would strengthen relationships with international organizations (Strategic Goal 3), as the proposal confounds Codex's mandate with that of other international organizations, particularly in the areas of animal welfare and environmental health.	USA
FIA agrees that there is a clear link between the proposed new work and the goals of the Codex Strategic Plan 2026-2031. FIA would like to highlight that NFPS is important as part of	Food Industry

the current efforts in addressing food security, especially if traditional agriculture techniques are not feasible in the market due to disasters or industrial projects. However, NFPS can introduce novel contaminants and allergens. To allow innovation to continue for NFPS, an internationally recognised framework of risk management principles need to be established to minimise potential safety issues in the long run. Trust in NFPS can then be established across markets during trade, reducing barriers to trade.	Asia
Whether the proposed scope of the work is sufficiently clear to support the development of Codex principles for the risk analysis of NFPS. See in particular Section 4 of the project document.	
<ul style="list-style-type: none"> The proposed scope appears too broad to support the case for developing risk analysis principles. The proposal suggests it could, subject to further discussion, capture NFPS based on the FAO descriptions of the term, which is that “new food sources” refers to any food sources not yet widely consumed globally, either because their consumption has historically been limited to specific regions of the world, or because only recent technological innovations have made it possible to produce or process them. “New food production systems”, on the other hand, refers to new technological innovations or advancements in pre-existing food technologies involved in new production systems. The “new food sources” issue is not a new problem. Countries have been dealing with these through novel food frameworks for sometime, without specific Codex risk analysis principles. The new work proposal has not provided any analysis of this status quo regarding international regulation. The Australian novel foods frameworks can consider whole foods, new foods and foods produced using new technologies, noting the data we need may be different depending on what the novel food is. Our view is that using NFPS as the definition for the scope of products to be covered by risk analysis principles could generally be problematic. This is because the concept of a product or technology being new is not static. It will change over time as products come into the market and more data becomes available. Equally, new does not necessarily mean no data. It would be counterproductive if products continued to be considered new despite availability of plentiful data. Developing risk analysis principles for NFPS could lead to this situation by embedding insufficient flexibility. 	Australia
See response to (i) above.	Canada
<p>Chile cree que esta propuesta aún debe subsanar varios puntos para poder continuar, por ejemplo:</p> <ul style="list-style-type: none"> Ser enfático en que se deben establecer definiciones adecuadas que permitan delimitar el alcance. De esta manera, que se limite a aquellos alimentos que efectivamente son novedosos y no tienen un historial de consumo seguro, no así, los que son novedosos para una región, pero tienen historial de consumo en alguna otra región. Ser lo suficientemente flexibles y generales para abordar la diversidad de fuentes y formas de producción nuevas (por ej, alimentos nuevos de mínimo procesamiento versus alimentos desarrollados en laboratorios). Que la evaluación considere la totalidad del alimento y posibles peligros, no peligros separados, tratándose de alimentos novedosos sin historial. Considerar la totalidad de elementos que están involucrado en el método de producción de los NFSP, por ejemplo, en los alimentos derivados de cultivos celulares (tema que está abordando el CCFA), se debe incluir la evaluación de todos los componentes de los medios de cultivo para asegurar la inocuidad. No incluir los otros factores legítimos (como componente ético y socioeconómicos), los otros factores legítimos ya están considerados en el Manual de procedimientos del Codex. Hay que aclarar que órgano auxiliar propone la Unión Europea que se haga cargo del trabajo, ya que no está en la propuesta. Como recomendación, podría ser la misma forma que se abordó para elaborar el stan CXS 44-2003 principio de análisis de riesgos derivados de la biotecnología moderna. Aclarar cómo se abordará que el nuevo trabajo no genere aprobaciones prolongadas o duplicadas, sea práctico y aplicable por las autoridades de control de alimentos, y finalmente no sea un freno para la innovación. Importante que se vele por la armonización con los textos ya existentes de análisis de riesgos, así evitar duplicidades. 	Chile

<p>The proposed scope is not sufficiently clear and must be narrowed down. Costa Rica maintains its firm position that any Codex principles focused on NFPS must center exclusively on the intrinsic characteristics, purity, and safety of the final food product and by no means on the technology, process, or production method evaluated in isolation.</p> <p>Justification: Pursuant to the principle of equivalence established in Article 4 of the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement), Members' measures must be accepted if they achieve the appropriate level of protection, regardless of whether the technological process differs. In line with this framework and existing Codex guidelines based on the Substantial Equivalence approach (such as CXG 45-2003 for recombinant-DNA plants), if a technological innovation or a new production process does not alter the safety, purity, or intrinsic properties of the final food compared to its conventional counterpart, there is no scientific or legal justification for creating special or differentiated principles to regulate it. The scope must be strictly delimited to the mandate set forth in Article 1(a) of the Statutes of the Commission: protecting the health of consumers and ensuring fair practices in the food trade, based solely on science.</p>	Costa Rica
<p>Egypt considers that further clarification is needed regarding the scope of the work and the terminology to be used. In particular, clear and internationally agreed definitions should be established for terms such as “new foods”, “new food sources”, and “new production systems”.</p> <p>The scope should clearly distinguish between:</p> <ul style="list-style-type: none"> • Foods with no history of safe use; and • Foods that have a documented history of safe consumption in certain countries or regions but are new to other markets. <p>Egypt also supports excluding minor technological changes or conventional processing practices that do not significantly alter the characteristics, composition, or safety profile of the final food.</p> <p>Egypt further emphasizes that the scope of the proposed work should clearly distinguish between NFPS and other existing concepts already recognized in international and national regulatory frameworks, particularly “Novel Foods”, foods derived from modern biotechnology, and other established categories of foods.</p> <p>Failure to clearly differentiate these concepts may result in regulatory overlap, inconsistent application of risk analysis principles, and uncertainty regarding the applicability of existing Codex texts. Therefore, the development of clear, internationally agreed definitions should be considered a prerequisite for the successful implementation of this work.</p> <p>Egypt considers that the proposed work would be particularly valuable if it establishes a clear framework for information exchange among Members regarding risk assessment methodologies, risk management approaches, and relevant regulatory decisions. Such information sharing would support transparency, improve consistency, and assist countries that are still developing regulatory systems for NFPS.</p>	Egypt
<p>Japan believes further consideration is necessary.</p> <p>CAC48 agreed that the project document was to be revised based on the comments made at CAC48 (REP25/CAC paragraph 94). Regarding the definition and scope of NFPS, Japan continues to hold the view expressed at CAC48 (REP25/CAC paragraph 92): “Foods considered new in one country or region may not be new in another, and careful consideration should be given to avoid classifying such foods as NFPS.” and “Novel foods developed through technological innovation should be distinguished from foods with long history of safe consumption.” However, it remains unclear how these comments have been reflected in defining the proposed range of the NFPS in the project document.</p> <p>In light of these comments in CAC48, Japan has concerns on including foods whose ‘consumption has been historically limited to specific regions’ within the scope of the new work.</p>	Japan
<p>The nature of the proposed work needs to be refined and more focused and we would see benefit in the focus being on if and how the CXG 62-2007 Working principles for risk analysis for food safety application by governments, would benefit from modification to future proof the work of Codex and provide additional guidance for countries in developing their regulatory frameworks for NFPS.</p>	New Zealand

<p>We consider that the scope is sufficiently clear. Chapter 4 of the project document has been expanded to include a description of definitions that would be relevant to incorporate into the principles, as well as the need for different risk assessment approaches for foods that are novel in all countries versus foods that are only novel in some countries but are traditional in others.</p> <p>The experiences shared by several countries and observers in the two consultations that have been conducted have been compiled in a report from CCEXEC (CX/EXEC 22/83/4). We consider this to be sufficient. The consultations illustrate that there are diverse experiences and challenges related to NFPS, and that overarching principles could contribute to a common foundation for the risk assessment, management, and communication of NFPS.</p>	Norway
<p>Saudi Arabia notes the improvements made to the scope, particularly the distinction between foods without a history of safe use worldwide and foods that may be traditional in some countries or regions but new in others. However, further clarification may be beneficial to ensure a common understanding of the products covered by the proposed work. In particular, the scope should clearly indicate whether the principles are intended to apply only to food for human consumption, or whether any related areas such as feed or other materials are outside the scope. Clear scope boundaries will help avoid differing interpretations during the development of the text.</p>	Saudi Arabia
<p>The new proposed scope provides useful basis for initiating the work however further clarification is needed regarding; 'New food', 'New food source'</p>	Sudan
<p>The United Kingdom notes the intention to develop a single overarching framework covering both new food sources and new production systems. While we see merit in promoting coherence, there may be a risk that a unified approach could dilute the specificity needed to address the distinct characteristics and risk profiles of different categories. It may therefore be helpful to consider whether clearer internal structuring or categorisation within the framework could support more tailored and effective application.</p>	United Kingdom
<p>The United States has concerns that the scope of the proposal is overly broad in that it attempts to address all of NFPS, which is a varied topic that includes diverse food safety considerations—many of which can be addressed using existing Codex mechanisms—and in that it continues to include foods that have a long history of safety and traditional consumption in some regions but may be new in another region. The proposal promotes the application of additional risk analysis principles by governments in this regard which would likely introduce trade barriers without an apparent public health benefit. It is unclear why the proposal continues to include these foods in its scope as, in the U.S. view, this is contrary to Codex's mandate to facilitate fair practices in the food trade. Notably, foods such as these have not been considered new foods sources in Codex to date.</p>	USA
<p>FIA agrees that definitions and mechanisms should be covered in the standard to establish the scope of NFPS, and whether it overlaps with existing standards. FIA agrees that the mechanisms should be sufficient to guide regulators to determine whether research data is appropriate and sufficient. The mechanisms should not be prescriptive, but should be flexible enough for national regulators to apply to a large range of NFPS.</p> <p>FIA would also like to highlight that the consideration of history of safe use is determined by the time when the national novel food regulation is implemented. As such, FIA would like to recommend only including the consideration of history of safe use as an optional safety consideration.</p> <p>While regulatory requirements are key to ensuring safe foods in the markets, FIA recommends that the provisions should not be prescriptive on how NFPS should be regulated. This is because the categories of NFPS are broad.</p> <p>Establishing regulatory requirements in a Codex standard may lead to further restrictions in the trade of NFPS and reduce interest in their innovation.</p> <p>Moreover, some NFPS food categories are not widely traded yet. With the presence of internationally recognised scope of regulatory frameworks, these could create trade barriers. Moreover, with the interpretation of novelty differing among markets, it would be difficult to establish sufficiently broad regulatory requirements as risk management recommendations at an international level.</p>	Food Industry Asia

<p>Similar to the risk analysis principles for microbiological foods, the new work should not address ethical, moral, or socioeconomic aspects of the research, development, production, or marketing of NFPS, as these topics go beyond the Codex mandate to focus on food safety and trade.</p> <p>The proposal notes that a key component of this new work will be identifying and defining NFPS. In previous Codex work on risk analysis principles, the scope was clear because the relevant food categories - foods derived from modern biotechnology (CXG 44-2003) and all foods (CXG 62-2007) - were already well understood and defined. In contrast, NFPS are not currently defined within Codex. As a result, the scope of the proposed work is inherently unclear. While the proposal aims to develop such definitions, establishing what constitutes NFPS seems like a necessary prerequisite to determining whether new risk analysis principles for these foods are needed, or can be accomplished in a single proposal, in the first place.</p> <p>Greater clarity is needed regarding what constitutes a “whole food” for the purposes of this new work proposal. It is unclear whether the term is intended to refer exclusively to single-ingredient foods, as suggested by the proposal's references to algae, seeds, and berries as examples of whole foods, or whether it is intended to encompass whole food products comprised of multiple inputs.</p>	<p>Good Food Institute</p>
<p>Whether the proposed new work clearly identifies gaps in existing Codex texts relating to the risk analysis of NFPS, how this proposal would address those and avoid unnecessary duplication with existing Codex work. See in particular Section “Importance of establishing risk analysis principles for NFPS” (para 12-16) including Annex II “Gap analysis related to the proposal to develop principles for the Risk Analysis of New Food Sources and Production Systems (NFPS)” of the Discussion paper.</p>	
<ul style="list-style-type: none"> • We do not think sufficient gaps have been identified to support new work and for the time being, the current general risk analysis principles accommodate at a high level, the concepts that the new work proposal proposes to cover for NFPS. • The Working principles for risk analysis for food safety for application by governments (CXG 62-2007) can be used flexibly. They are suitable for NFPS and “conventional” foods with a history of safe use. • They are useful for the assessment of isolated hazards/individual components of foods and the assessment of whole foods, noting food risk assessments are fundamentally driven by composition and dietary exposure relative to established health-based guidance values or appropriate comparators. • We would argue that the current principles allow for pre-market authorisation. <ul style="list-style-type: none"> o Footnote 4. For the purpose of these Principles, preliminary risk management activities are taken to include: identification of a food safety problem; establishment of a risk profile; ranking of the hazard for risk assessment and risk management priority; establishment of risk assessment policy for the conduct of the risk assessment; commissioning of the risk assessment; and consideration of the result of the risk assessment. • While it is true the general risk analysis principles do not mention labelling specifically, we would argue that labelling is equally as important for NFPS and non-NFPS. Existing horizontal principles still apply and individual countries can consider the specifics relevant to their contexts. • We would suggest the current principles cover off at a high level the concept of post-market monitoring. <ul style="list-style-type: none"> o 39. Risk management should be a continuing process that takes into account all newly generated data in the evaluation and review of risk management decisions. The relevance, effectiveness, and impacts of risk management decisions and their implementation should be regularly monitored and the decisions and/or their implementation reviewed as necessary. • The new work proposal states that “while CXG 62-2007 applies horizontally to all foods, including food from NFPS, it is intentionally general in nature and does not address specific considerations arising from the novelty, complexity and diversity of NFPS”. We think it is precisely this diversity that will make it difficult to set principles to address them as a group. There is no reason the current principles could not be applied to risks associated with novel production technologies. They accommodate analysis of risks associated with production/processing technologies or other pathways for hazard introduction. 	<p>Australia</p>
<p>Canada is of the view that the gap analysis does not adequately identify gaps or deficiencies in existing Codex texts relating to the risk analysis principles for NFPS nor provides evidence of regulatory inconsistencies requiring a new framework. As the proposal notes, CXG 62-</p>	<p>Canada</p>

<p>2007 provides overarching principles that cover all foods, including NFPS, and allows for case-by-case assessments and appropriate risk management tools. Countries have established risk analysis frameworks based on these principles and have gained experience in their implementation while facing new and emerging risks. The focus of the proposal appears to rely, in many cases, on speculative risks across a broad set of products. As was suggested at CCEXEC89, national experiences on assessment of NFPS could be examined to identify if any real-world challenges were encountered when using existing risk analysis frameworks for NFPS, and an analysis should demonstrate whether existing Codex texts would be unable to address these gaps.</p>	
<p>Costa Rica considers that no insurmountable regulatory gaps have been demonstrated within the current horizontal texts of Codex to justify the creation of an independent framework. The existing risk analysis framework already possesses the necessary elements to address food safety in a general manner.</p> <p>Justification: Before proceeding with the drafting of an independent document, it is indispensable to thoroughly evaluate whether current horizontal principles, such as the Working Principles for Risk Analysis for Food Safety for Application by Governments (CXG 62-2007), present real limitations that cannot be resolved through minor amendments or complementary application guidelines within existing horizontal committees. The rushed development of a new text without a clearly defined scientific-technical gap can lead to unnecessary duplication of work and regulatory contradictions within Codex itself.</p>	Costa Rica
<p>Egypt acknowledges that certain gaps may exist regarding the application of risk analysis principles to some categories of NFPS. Nevertheless, a clear focus should be maintained on areas where existing Codex guidance may not be sufficient.</p> <p>The development of new principles should build upon existing Codex risk analysis frameworks and avoid creating overlapping requirements or parallel risk assessment approaches.</p>	Egypt
<p>Japan would like to express its appreciation to the EU for undertaking the gap analysis. While the analysis provides useful insights, Japan considers that it does not clearly indicate necessity of establishing risk analysis principles for NFPS.</p> <p>The gap analysis of national frameworks provides useful information on the different national regulatory approaches, experiences and challenges reported by Members in response to previous Circular Letter (CL 2022/06-CCEXEC). However, Japan considers that it does not sufficiently identify gaps in existing Codex texts relating to the application of risk analysis.</p> <p>Furthermore, the Circular Letter used as the basis for the gap analysis sought information on a wide range of products including plant-based protein alternatives, seaweed, and edible insects. Japan notes that some Members, including Japan, considered certain products included in the consultation were not necessarily be classified as NFPS during previous discussions.</p> <p>Japan considers that the working principles for risk analysis for food safety for application by governments (CXG 62-2007) provide a general framework applicable to all foods including foods that may fall within the proposed scope of NFPS. Some Members have also already applied the Working principles for risk analysis for food safety for application by governments (CXG 62-2007) to address foods without a history of safe consumption (REP25/CAC, paragraph 92).</p> <p>With this background, the gap analysis of the Discussion Paper does not clearly indicate what specific elements are lacking in the existing Codex texts for applying risk analysis for NFPS nor what elements are required in a new Codex text.</p> <p>It also remains unclear how the proposed risk analysis would address specific considerations arising from foods that may fall within the proposed scope of NFPS while avoiding unnecessary duplication with existing Codex work.</p> <p>Japan consequently would like to request further clarification from the EU on which specific elements of risk analysis are not adequately addressed by existing Codex texts such as CXG 62-2007 and Principles for the risk analysis of foods derived from modern biotechnology (CXG 44-2003) and how the proposed new work would address such elements while avoiding unnecessary duplication with existing Codex work.</p>	Japan

We think that the Gap Analysis requires further work. We do however think that the CXG 62-2007 Working principles for risk analysis for food safety application by governments are broad in nature to cover the framework of NFPS but do not provide adequate granularity for areas that are more relevant to NFPS than to conventional foods including “safe history of use”, pre-market authorisation and post marketing monitoring.	New Zealand
<p>Saudi Arabia welcomes the clarification that the proposed principles are intended to be supplemental to (CXG 62-2007), and that they would take into (CXG 44-2003). This clarification is important to avoid duplication and promote consistency with existing Codex texts.</p> <p>Saudi Arabia also considers that the gap analysis provides a useful basis for discussion. In this regard, further clarification may be beneficial regarding how the proposed work would address foods that have a history of safe use in some countries or regions but are considered new in others. Clarifying how existing concepts, such as history of safe use, would be considered within the risk analysis framework may further support a consistent and proportionate approach across different types of NFPS.</p>	Saudi Arabia
As outlined in Annex II, “Gap Analysis Related to the Proposal to Develop Principles for...”, we agree that new work clearly identified gap in the existing codex texts Principles for Risk Analysis for Food Safety for Application by (CXG 62-2007), Modern Biotechnology (CXG 44-2003)	Sudan
<p>On duplication, the United Kingdom suggests that consideration be given to how the proposed approach aligns with existing frameworks such as HACCP and GMP, in order to provide a familiar basis for implementation and avoid duplication of controls without added safety benefit.</p> <p>The UK also notes the apparent intention for these principles to supplement the general risk analysis principles in CXG 62-2007, in a manner similar to CXG 44-2003, and considers that this relationship could be more clearly and explicitly set out in the proposal.</p>	United Kingdom
In the U.S. view, the proposal does not present a comprehensive gap analysis and does not clearly identify gaps in existing Codex texts related to the risk analysis of NFPS. On the contrary, the gap analysis section acknowledges that horizontal standards cover food safety aspects of foods and that existing vertical standards may also be applicable to new foods. The United States is of the view that if a Codex subsidiary body or member identified a need to update a horizontal or vertical standard to account for a new, or unaccounted for, safety, health, or labelling issue, then there already exist robust Codex mechanisms to do so for that specific food or horizontal issue.	USA
Whether the proposed approach for the development of principles for the risk analysis of NFPS are practical, sufficiently flexible, and suitable for application across different types of NFPS. See in particular Section 4 including Annex I “Principles for the Risk Analysis of New Food Sources and Production Systems (NFPS) – Draft outline” of the project document.	
The following sentence should be added as follow	Algeria
<ul style="list-style-type: none"> • The proposed approach may reduce existing flexibility without adequate justification for doing so. • The new work proposal argues that CXG 44-2003 Principles for the risk analysis of foods derived from modern biotechnology demonstrates the need for complementary risk analysis principles for some specific categories of foods. It also suggests including many of the elements found in CXG 44-2003. • While we agree there is precedent for this approach, and CXG 44-2003 has proved useful, it must be noted that the NFPS landscape the new work proposal covers is different, much has been learned and has changed in the last 20 years since the biotech work began, and we should not assume that replicating the same approach is necessarily what will be most useful for regulators. • CXG 44-2003 relates to a narrowly defined scope of products (one particular type of NFPS, as stated in the new work proposal). The narrow scope allowed for the development of guidance to support regulators in this specific area. It is not clear how principles to cover all NFPS would provide added value while also remaining flexible and broad enough to be applicable to all NFPS. • Also see previous comments above regarding the scope. 	Australia

<p>Canada considers it premature to initiate new work on developing risk analysis principles for NFPS based on the current project document. The proposal is overly broad, lacks clarity regarding its scope and intended application, and does not clearly identify gaps in existing Codex risk analysis texts.</p> <p>For example, Canada notes that while the history of safe use for certain foods may be limited to specific regions, it would be inappropriate to include these foods (e.g. plant-based protein alternatives, seaweed, edible insects, microalgae) into the scope of this work as any potential hazards identified would not be new and as such could be addressed by existing risk analysis frameworks or existing regional standards.</p>	Canada
<p>Egypt supports the development of science-based, practical, and flexible principles that can be applied across the broad range of NFPS.</p> <p>The principles should:</p> <ul style="list-style-type: none"> • Be proportionate to the level of risk. • Consider both the characteristics of the final product and the production process, where relevant to food safety. • Take into account available evidence of safe use at national, regional, or international levels. • Be applicable by countries with different levels of regulatory and scientific capacity. <p>Egypt further highlights the importance of capacity building, technical assistance, and information sharing to support developing countries in implementing risk analysis approaches for NFPS and strengthening their regulatory oversight systems.</p> <p>Egypt also considers that the development of practical guidance, case studies, and information-sharing mechanisms would be particularly beneficial for developing countries with limited experience in the assessment of NFPS.</p>	Egypt
<p>We would see that the proposal would benefit from refinement and focus on modification of the existing Codex text CXG 62-2007 Working principles for risk analysis for food safety application by governments, potentially with the addition of an Annex to extrapolate the principles/guidance as appropriate for NFPS. This is a significant simplification to what is currently proposed.</p>	New Zealand
<p>Saudi Arabia considers that the proposed approach is generally practical and flexible, provided that the principles remain overarching, science-based, proportionate, and adaptable to different categories of NFPS. Given the wide diversity of NFPS, the future text should avoid being overly prescriptive and should allow Members to apply risk analysis principles according to the nature of the product, the degree of novelty, the available evidence, and national regulatory contexts.</p> <p>Saudi Arabia also suggests that the future work distinguish clearly between risk communication to consumers, such as labelling and information transparency, and technical information exchange among competent authorities, such as data sharing, risk assessment outcomes, and risk management decisions.</p>	Saudi Arabia
<p>Sudan supports the proposed approach provided that it: Applies a case -by-case risk assessment. consider varying capacity of codex members. Allow the use of relevant assessment from competent authorities</p>	Sudan
<p>The United Kingdom has the following observations relating to practicality, flexibility, applicability:</p> <p>Whole food assessment</p> <p>We acknowledge the concept of a “whole food assessment” and agree that a broad, system-level view can be valuable. However, further clarity would be beneficial on how this approach would interact with, and complement, existing hazard-based risk analysis frameworks. Without this, there is a risk that the concept becomes overly broad and more difficult to operationalise in practice.</p> <p>History of safe use / weight of evidence</p> <p>We agree with the identification of the absence of a history of safe use as a key challenge in this area. At the same time, it may be useful to consider whether the approach could more explicitly accommodate the use of analogous foods, ingredients, or production processes,</p>	United Kingdom

<p>where appropriate, in order to support a weight-of-evidence approach and avoid overly binary assessments.</p> <p>Post-market monitoring</p> <p>While we note the inclusion of post-market monitoring, additional consideration may be warranted regarding the purpose, scope, and potential triggers for such activities. Greater clarity in this area could help ensure that post-market measures are both proportionate and effective as part of the overall risk management framework.</p>	
<p>The United States is of the view that the proposed approach is not practical or suitable for the risk analysis of NFPS. Not only would such an approach introduce confusion in the application of Codex's existing risk analysis principles, but it would also open the possibility of trade barriers for foods that would be subject to additional risk assessment criteria based on traditional consumption patterns rather than science-based safety considerations. The United States notes that the 2025 foresight exercise conducted by FAO recommended that efforts be conducted on more detailed analysis on the food safety aspects and nutritional considerations of selected innovations. This indicates that the need for additional risk analysis principles should be considered on a case-by-case basis related to specific food safety, regulatory, labelling, nutritional, and quality issues of a new food, rather than a broad-ranging proposal for all NFPS.</p>	USA
<p>FIA is in agreement with the proposed approach. FIA agrees that the proposed new work addresses the key gaps identified in Annex II. However, FIA would like to highlight that there are already existing Codex standards for several concerns raised in Annex II. These Codex standards can be referenced in the new work proposal. Ongoing discussion papers should also be recognised. The discussion paper on the safety assessment of cell culture media components could overlap with the contents covered in this new work proposal. Clarity should be provided regarding how they are distinguished.</p>	Food Industry Asia
<p>Achieving risk analysis principles that are practical, sufficiently flexible, and applicable across all NFPS may require principles that are so broad that they provide little meaningful guidance. The proposal itself acknowledges significant differences among NFPS categories through its landscape analysis, which organizes products by type and identifies distinct regulatory and food safety considerations for each. The report further discusses category-specific labeling and nutrition issues, which would more appropriately fall within the mandates of CCFL and CCNFSU, respectively, rather than as broad risk analysis principles.</p>	Good Food Institute
<p>Which Codex subsidiary body would be most appropriate to undertake this work should it be approved by CAC.</p>	
<p>It is better to complete the sentences as follows</p>	Algeria
<ul style="list-style-type: none"> Australia is not supportive of new work being taken forward in its current proposed form. 	Australia
<p>N/A. Canada believes that it would be premature to agree to new work on the development of principles for the risk analysis of new food sources and production systems, as clear gaps in existing Codex texts have not been identified .</p>	Canada
<p>Chile cree que la propuesta no considera aún un organismo subsidiario. Podría ser el mismo que realizó las directrices de la norma CXG 44-2003 (principios de análisis de riesgos para eventos biotecnológicos.</p>	Chile
<p>In the event that the Commission decides to approve this work by consensus, Costa Rica formally proposes that the matter be assigned in the first instance to the Codex Committee on General Principles (CCGP).</p> <p>Justification: As this proposal intends to dictate macro-guidelines and horizontal principles on risk analysis (assessment, management, and communication), CCGP is the subsidiary body with the appropriate mandate to analyze the general regulatory impact. We consider it indispensable that this committee thoroughly and prioritarily evaluate whether the current risk analysis framework in CXG 62-2007 truly presents insurmountable gaps before delegating the drafting of specific guidelines or moving forward with an independent document.</p>	Costa Rica
<p>The approach outlined in the proposa, lacks the necessary flexibility, which will generate detrimental technical disparities for international trade.</p> <p>Justification: Since Codex operates as the direct regulatory benchmark for the WTO SPS Agreement, introducing highly complex risk assessment methodologies such as the</p>	Costa Rica

toxicological and nutritional evaluation of "whole foods" rather than isolated hazards will create a technical disparity that is extremely difficult to fulfill. The socio-economic reality of developing countries is that they lack the budget, specialized laboratories, and analytical infrastructure required to undertake such costly, exhaustive, and prolonged analyses. By failing to prioritize viable pathways for process simplification, scientific information transfer, or mutual recognition, the current structure of this document poses a disguised technical barrier. This exclusively benefits technologically advanced markets while hindering local innovation and severely limiting the commercial potential of developing economies.	
New Zealand would see a modified and focused proposal going to the Codex Committee for General Principles (CCGP)	New Zealand
<p>There is currently no dedicated Codex committee for NFPS. Unlike Codex principles for food additives, contaminants, pesticides, etc., these principles would not address the risk analysis of specific substances used in food but would instead apply to whole foods or entire ingredients.</p> <p>It was noted at the FAO foresight technical meeting that, for many NFPS, the health risks are largely comparable to those associated with conventional foods (e.g. risks related to contaminants, allergens, etc.), while at the same time there may be additional risks that are unique to NFPS. This suggests that existing Codex standards are likely already capable of addressing several of the risks associated with NFPS.</p> <p>NFPS constitute a diverse category of foods, including insects, berries, seeds, macroalgae (seaweed), microalgae, as well as processed food products such as plant-based foods (alternatives to meat, milk and eggs), precision fermentation products, 3D-printed/additively manufactured foods, and cell-cultured foods.</p> <p>None of the existing general subject committees appears particularly well-suited to undertake this work. It may therefore be appropriate to consider establishing an ad hoc task force to carry out this assignment.</p>	Norway
Saudi Arabia recognizes the cross-cutting nature of NFPS and notes that the proposed work spans several areas of Codex activity. In the longer term, the Codex Committee on General Principles (CCGP) may be well placed to undertake this work, given its focus on overarching principles and its role in maintaining consistency across Codex texts. However, considering that discussions on the scope, definitions, and relationship with existing Codex texts are still evolving, an initial intersessional mechanism, such as an Electronic Working Group (EWG), may be beneficial to further refine the scope and objectives of the work, identify any remaining gaps, and support coordination across relevant Codex committees. Such an approach could help ensure that the work builds upon existing Codex texts and ongoing initiatives while avoiding unnecessary duplication.	Saudi Arabia
Sudan support assigning this work to CCGP as it concerns general risk analysis principles that covers a wide variety of food types; therefore, this horizontal committee structure allows for cross-functional collaboration among different departments and specialists. Relevant Codex committees may provide technical input as needed.	Sudan
As there remain several questions related to the scope, applicability, and justification for this proposed new work, it would not be appropriate to consider undertaking new work in the Codex subsidiary bodies at this time.	USA
FIA recommends an ad-hoc intergovernmental task force to be established to work on this. This is because the new work proposal would cover topics across many Codex subsidiary bodies. Placing the work on a single body would not provide sufficient expertise to cover all the pertinent aspects of the new work proposal. This is the similar approach to the work on genetically modified foods.	Food Industry Asia
Whether this work would be beneficial for your country or organization and, if so, whether your country or organization would be willing to actively participate in and contribute to the proposed new work should CAC approve it.	
• Australia does not see benefit in the proposed new work as currently defined.	Australia
Risk analysis principles, such as CXG 44-2003 and CXG 62-2007, have been in place in Codex for 20 years and are fundamentally similar. Many countries have extensive experience applying existing risk analysis frameworks based on Codex texts to emerging risks and new/novel foods. Canada has a pre-market novel food risk assessment process in	Canada

place that would consider the safety of food products that are new or changed compared to existing food before the product is proposed for sale or advertised in Canada.	
Under the current terms of the proposal, the document would not benefit Costa Rica	Costa Rica
Egypt considers this work relevant and beneficial given the rapid evolution of food systems and the increasing emergence of NFPS in international trade. Egypt is willing to actively participate in and contribute to the future development of this work to ensure that the resulting principles remain science-based, practical, and supportive of consumer protection, fair trade practices, and the needs of developing countries.	Egypt
New Zealand sees benefit in this work progressing but not as currently proposed but with a more focused scope and as additional guidance /principles to the CXG 62-2007 Working principles for risk analysis for food safety application by governments. We would see this work initially being progressed within the CCGP. New Zealand would actively participate and contribute to this work going forward.	New Zealand
Saudi Arabia has already established a national framework and guidance for the safety assessment of novel foods. In this regard, Saudi Arabia recognizes the importance of clear and science-based approaches for evaluating emerging food products and would welcome the development of internationally harmonized Codex principles to support greater consistency, transparency, and international alignment. Saudi Arabia would be willing to actively participate in and contribute to the proposed work should it be approved by CAC.	Saudi Arabia
For Sudan it is important to have clear framework for such foods regarding public health protection, market regulation, opening economic and export opportunities. Sudan is willing to contribute to future discussion, subject to available resources and experts	Sudan
The United States believes that Codex is equipped to be proactive, flexible and responsive to emerging issues that impact on food safety and quality, and that Codex should continue to seek opportunities to do so within its mandate of protecting consumer health and ensuring fair practices in the food trade. Where Codex has undertaken work on new food sources within its existing mechanisms (e.g., microbial omega-3 oils in CCFO), the United States sees the value and benefit of developing risk-based standards for such emerging issues within the existing Codex framework. However, the benefit of this proposed new work is not evident and may carry the potential for unintended consequences described in our comments above. Participation in any new work would therefore be essential to ensure alignment with Codex's mandate and avoid potential negative impacts.	USA
FIA is interested in supporting on the new work should CAC approves it.	Food Industry Asia
Should this new work move forward, GFI is willing to actively participate in and contribute to it.	Good Food Institute
Any other issues that Members or Observers wish to bring to the attention of CCEXEC90 or CAC49 in relation to this proposal.	
Canada is of the view that the issue that member countries are facing with respect to NFPS may be the lack of guidance on how to conduct safety assessment of foods derived from innovative technologies. Canada suggests that the development of safety assessment guidance for specific types of NFPS, i.e. foods produced using new technologies, would be of greater benefit to member countries and would form the basis for work within specific Codex committees, such as the proposal to assess cell culture media components in CCFA; and the development of a code of hygienic practice for the manufacturing of cell-based foods by CCFH. The proposal to include environmental and other non-food safety considerations into the risk analysis principles risks exceeding Codex's mandate and creating trade concerns: <ul style="list-style-type: none"> • With respect to "other legitimate factors," Canada notes that Codex guidance already establishes strict criteria for their inclusion. These factors may only be considered when they meet the requirements set out in the Codex Procedural Manual, including global applicability and acceptance. • Regarding "One Health," Canada recognizes Codex's important contribution to broader global objectives but emphasizes that Codex must remain within its mandate and areas of 	Canada

<p>expertise. Codex is not a One Health standard-setting body, although its standards can support national implementation of One Health approaches.</p> <p>Canada continues to support the CCEXEC89 recommendation to further clarify key concepts such as “new foods” and “new production systems”, assess if genuine gaps exist in current Codex guidance, and then define a clear scope for any new work proposal.</p> <p>As previously indicated, national experiences on assessment of NFPS could be examined to identify if any real-world challenges were encountered when using existing risk analysis frameworks, and an analysis should demonstrate if existing Codex texts would be unable to address these gaps and what guidance is needed.</p> <p>Any potential new work should be informed by input from Members and Observers, including through comments submitted in response to the circular letter, CL 2026-44-CAC.</p>	
<p>Costa Rica wishes to respectfully emphasize the importance of preserving the core institutional mandate of the Codex Alimentarius Commission. We encourage Members to ensure that the Commission’s valuable resources and efforts remain firmly focused on its primary dual objective: protecting consumer health through robust scientific evidence and facilitating fair practices in the international food trade.</p>	Costa Rica
<p>Egypt emphasizes that the proposed principles should remain science-based, risk-analysis driven, and sufficiently flexible to accommodate national circumstances and regulatory systems.</p> <p>Egypt reaffirms its previously submitted comments regarding certain categories of NFPS. In particular, Egypt notes that, in the case of cultivated meat, seafood, and dairy products, consideration should be given to the source of the cultured cells, including aspects that may be relevant to specific consumer groups and national regulatory requirements.</p> <p>Egypt further emphasizes the importance of clear, transparent, and non-misleading labelling provisions to ensure that consumers are adequately informed regarding the nature and characteristics of such products, especially in markets with halal requirements, thereby supporting consumer protection and fair practices in food trade.</p> <p>Furthermore, any consideration of concepts such as One Health or other legitimate factors should remain within the scope of Codex’s mandate and should not expand the framework beyond food safety, consumer protection, and fair practices in food trade.</p> <p>Egypt looks forward to continued discussions on this important topic.</p>	Egypt
<p>Japan emphasizes that Codex work should be undertaken within the Commission’s statutory purpose. Japan notes that the relevance of some proposed aspects including “One Health approach” and “Other legitimate factors” in the context of risk analysis of NFPS is unclear. Japan believes that the proposed work should focus on food safety issues that are clearly within the remit of Codex and that any gaps in existing Codex texts should first be identified before considering the introduction of additional aspects.</p>	Japan
<p>Saudi Arabia would welcome further clarification on the reference to “ethical concerns” under other legitimate factors, including the intended scope of such considerations and how they relate to the Codex mandate and existing risk analysis framework. Clarifying this aspect would help ensure a common understanding among Members, as the interpretation of ethical considerations may vary across countries and regions depending on national, cultural, societal, religious, environmental, or other policy considerations. Saudi Arabia considers that the future text should remain focused on Codex’s mandate of protecting consumer health and ensuring fair practices in food trade, while allowing Members to address nationally relevant considerations within their respective regulatory frameworks.</p> <p>Saudi Arabia also emphasizes the importance of ensuring that this work does not delay or duplicate ongoing NFPS-related initiatives in other Codex committees. Rather, it should complement them and contribute to a coherent Codex approach that supports innovation, food safety, and consumer protection.</p>	Saudi Arabia
<p>Sudan recommends that the work:</p> <ul style="list-style-type: none"> Remain science based and within codex food safety mandate Support capacity building for developing countries consider their resources and constrains Promote international cooperation and information to avoid duplication and improve efficiency 	Sudan

General Position Sudan support the initiation of this new work, subject to the comments above, particularly regarding the need for clearer definition, a well-defined scope, avoidance of duplication with existing Codex texts and appropriate consideration of the capacities and need of developing countries.	
The United Kingdom is continuing its internal considerations and looks forward to engaging constructively in further discussions on this proposal.	United Kingdom
FIA has no further issues to bring up.	Food Industry Asia