The Good Food Institute\(^1\) (GFI) thanks FAO and WHO for their working document on “New Food Sources and Production Systems: Need for Codex Attention and Guidance?” under Agenda Item 8. The GFI respectfully draws the attention of the distinguished delegates to the following important points raised by the FAO/WHO:

- The need for science-based decisions, in line with current CAC Strategic Plan\(^3\) Goal 2,
- The right to choose foods with healthier and other attributes or extrinsic properties,
- The need to take into consideration the outcome of the UN Food Systems Summit,
- The need to take into consideration the FAO New Strategy 2022-2030 and reference to “innovative food production and processing,”\(^4\) such as “cellular agriculture” and “laboratory grown foods” (which we refer to as cultivated and fermented foods),
- The need to take into consideration the WHO New Strategy 2022-2030, and
- The need to take into consideration the dual mandate objective and Codex’s 2020-2025 Strategic Plan, especially Goals 1 and 3.

GFI is committed to bringing its expertise to support future discussions relating to—

- Whether there is a need for overarching guidelines on key principles for the development of new food sources and production systems (NFPS),
- Whether there is a need to develop a dedicated Codex standard on cultivated meat,
- Whether there are needed changes to existing Codex texts, such as those referring to vegetable protein products (VPP),
- The proper use of meat and fish terms on labels of plant-based and cultivated products, and
- Specific guidance on foods and ingredients obtained through new technologies involving fermentation processes.

GFI submits that it is important for the CCEXEC and CAC to begin gathering information on potential new work defining global guidance to Codex members in this regard. We respectfully urge CAC to suggest the preparation of a discussion paper for consideration at the forthcoming CCEXEC and CAC meetings. Such a discussion paper would be prepared in close coordination with FAO, WHO, and other interested parties. We stand ready to provide technical assistance and to connect FAO and WHO with subject-matter experts. To help identify relevant issues and options, a circular letter could be issued to request inputs by Codex members and observers regarding the potential development of such a discussion paper.

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2 The Good Food Institute (GFI) is a nonprofit civil society organization developing the roadmap for a sustainable, secure, and just protein supply. We identify the most effective solutions, mobilize resources and talent, and empower partners across the food system to make plant-based and cultivated meat accessible, affordable, and delicious. We are headquartered in the United States and have affiliates in Brazil, Europe, Israel, and Asia. You may contact our Vice President of Policy Jessica Almy at jessicaa@gfi.org.
4 See CCEXEC81 & CAC44 working document CX/CAC 21/44/15 Add.2 Rev.1 page 5 and page 9
featuring information on national governments’ and food business operators’ experience in developing national frameworks conducive to the safe use of NPFS.

CAC could also ask each of the six FAO/WHO Regional Coordination Committees to consider this matter under “Matters referred,” as well as, where relevant, the Codex Alimentarius committees, including CCFL, CCNFSDU, CCMAS, CCFA, CCCF, CCRVDF, CCFH, and perhaps others.