



Organización de las Naciones
Unidas para la Alimentación
y la Agricultura



Organización
Mundial de la Salud

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Tema 5 del programa

CX/CAC 25/48/10

Octubre de 2025

PROGRAMA CONJUNTO FAO/OMS SOBRE NORMAS ALIMENTARIAS

COMISIÓN DEL CODEX ALIMENTARIUS

48.º período de sesiones

Sede de la FAO, Roma (Italia)

10-14 de noviembre de 2025

PROPUESTAS DE NUEVOS TRABAJOS

A. Propuestas de nuevos trabajos sometidas a la aprobación de la Comisión del Codex Alimentarius en su 48.º período de sesiones por los órganos auxiliares activos

1. El presente documento es una compilación de las propuestas de nuevos trabajos sometidas a la aprobación de la Comisión en su 48.º período de sesiones por los órganos auxiliares que se han reunido desde el 47.º período de sesiones, así como de las propuestas de nuevos trabajos recibidas por la Secretaría del Codex desde el 47.º período de sesiones de la Comisión que no se corresponden con un comité activo. Las propuestas de trabajos se presentan compiladas en este documento a fin de ofrecer una visión general de las esferas propuestas de nuevos trabajos para respaldar la consideración por la Comisión de las propuestas de nuevos trabajos.
2. El Comité Ejecutivo del Codex, en su 88.ª reunión, consideró las propuestas de nuevos trabajos presentadas por los comités que se habían reunido entre enero y mayo de 2025 (propuestas 1 a 7 del Cuadro 1), mientras que en su 89.ª reunión el Comité Ejecutivo considerará las propuestas de nuevos trabajos presentadas por los comités que se hayan reunido entre junio y octubre de 2025 (propuestas 8 a 12 del Cuadro 1), así como dos propuestas de nuevos trabajos presentadas por un miembro (Cuadro 2).
3. Todas las propuestas de nuevos trabajos están disponibles en español, francés e inglés y pueden consultarse [aquí](#).
4. En el Cuadro 1 se proporciona un resumen de todas las propuestas de nuevos trabajos presentadas por los órganos auxiliares activos del Codex desde el 47.º período de sesiones de la Comisión y se incluyen las referencias correspondientes, en particular dónde encontrar los documentos de los proyectos.
5. Las 12 propuestas de nuevos trabajos sometidas a la aprobación de la Comisión en su 48.º período de sesiones por los órganos auxiliares del Codex consisten en propuestas de nuevas disposiciones sobre aditivos alimentarios, tres normas regionales, dos normas sobre productos, la revisión de dos códigos de prácticas, un nuevo código de prácticas y la conversión de una norma regional en una norma mundial, así como dos listas de prioridades para su evaluación por los comités de expertos pertinentes.

B. Propuestas de nuevos trabajos que no son de la competencia de órganos auxiliares activos

6. En el Cuadro 2 figuran dos propuestas de nuevos trabajos presentadas directamente a la Secretaría del Codex, ya que no están comprendidas en el mandato de un órgano auxiliar del Codex activo.

Propuesta relativa a la elaboración de una norma para la leche de camella pasteurizada

7. En el 47.º período de sesiones de la Comisión (2024), en el marco del tema "Otros asuntos" del programa, los Emiratos Árabes Unidos presentaron un documento de debate y una propuesta de nuevo trabajo sobre la elaboración de una norma para la leche de camella¹.
8. Los miembros acogieron con agrado la propuesta de los Emiratos Árabes Unidos y consideraron que era oportuna y reflejaba el aumento de la producción y el comercio de leche de camella y sus productos, y destacaron la necesidad de comenzar a trabajar en este ámbito de manera oportuna y en consonancia con los procedimientos y prácticas establecidos.

¹ CAC47/CRD03.

9. Teniendo en cuenta la recomendación formulada por el Comité Ejecutivo en su 87.^a reunión de que “en caso de que la Comisión en su 47.^o período de sesiones decidiera que se siguiera trabajando sobre la leche de camella, considerara la posibilidad de emitir una carta circular para recabar las opiniones de los miembros y los observadores sobre la necesidad y el posible alcance de toda nueva labor sobre la leche de camella”², así como las orientaciones sobre el procedimiento brindadas por la Secretaría del Codex y el apoyo ofrecido por la secretaría del país hospedante del Comité del Codex sobre la Leche y los Productos Lácteos (CCMMP), la Comisión, en su 47.^o período de sesiones, acordó un enfoque que incluía el examen y la revisión del documento del proyecto y la emisión de una carta circular (CL 2025/50-CAC) para solicitar las observaciones de los miembros y observadores³.
10. La Comisión señaló que en la carta circular se podrían solicitar comentarios de los miembros y observadores interesados sobre la necesidad y el posible alcance del nuevo trabajo sobre la leche de camella, con miras a que la propuesta relativa a la leche de camella se sometiera al examen crítico del Comité Ejecutivo en su 89.^a reunión y a la consideración de la Comisión en su 48.^o período de sesiones.
11. En agosto de 2025 se publicó la carta circular CL 2025/50-CAC con el fin de recabar observaciones de los miembros y observadores sobre la propuesta relativa a la elaboración de una norma para la leche de camella pasteurizada. La carta circular incluía, en el Apéndice I, una propuesta actualizada con el objeto de proporcionar información adicional sobre la necesidad y la naturaleza de una norma o normas del Codex para los productos derivados de la leche de camella y tener en cuenta la información que debía examinar el Comité Ejecutivo en el examen crítico. Además, en el Apéndice I de la carta circular se incluía un análisis de las deficiencias realizado por Nueva Zelandia, en su calidad de país hospedante del CCMMP, y la Federación Internacional de Lechería (FIL) sobre i) los textos existentes del Codex relativos a posibles problemas de adulteración y etiquetado incorrecto y ii) los textos existentes del Codex relativos a la leche de camella y sus productos.
12. Las observaciones recibidas en respuesta a la carta circular CL 2025/50-CAC se recopilan en el Apéndice I del presente documento. Estas reflejan diferentes opiniones sobre la propuesta de nuevo trabajo, que van desde la necesidad de dicho trabajo hasta su alcance.
13. En su 12.^a reunión, el Comité Coordinador FAO/OMS para el Cercano Oriente (CCNE) tomó nota del apoyo a la propuesta de nuevo trabajo sobre la elaboración de una norma para la leche de camella pasteurizada y comunicó opiniones sobre su importancia y los aspectos que debían considerarse en ella⁴.

Propuesta relativa a la elaboración de principios para el análisis de riesgos de fuentes de alimentos y sistemas de producción nuevos

14. La Unión Europea (UE) ha presentado recientemente una propuesta de nuevo trabajo sobre la elaboración de principios para el análisis de riesgos de fuentes de alimentos y sistemas de producción nuevos (FASPN).
15. El tema de las FASPN se debatió en la 82.^a reunión del Comité Ejecutivo (2021), en el 44.^o período de sesiones de la Comisión (2021), en la 83.^a reunión del Comité Ejecutivo (2022), en el 45.^o período de sesiones de la Comisión (2022) y en el 46.^o período de sesiones de la Comisión (2023). Anteriormente se habían publicado dos cartas circulares para recabar información de los miembros del Codex sobre el tema, y dicha información se publicó para la 83.^a reunión del Comité Ejecutivo⁵.
16. En el Apéndice II del presente documento se incluye un enlace al documento de debate y el documento del proyecto.

C. Recomendaciones

17. Se invita a la Comisión, en su 48.^o período de sesiones, a que:
 - i. considere estas propuestas de nuevos trabajos a la luz del *Plan estratégico del Codex para 2020-2025* y de los “Criterios para el establecimiento de las prioridades de los trabajos” (Sección 2.3) y los “Criterios para el establecimiento de órganos auxiliares de la Comisión del Codex Alimentarius” (Sección 2.2) del *Manual de procedimiento* del Codex;
 - ii. decida si emprender o no cada uno de los nuevos trabajos, según proceda, teniendo en cuenta el examen crítico efectuado por el Comité Ejecutivo en sus reuniones 88.^a y 89.^a, según corresponda, y, en caso necesario, decida cuál de los órganos auxiliares debería emprender los trabajos o si debería hacerlo otro órgano.

² REP24/EXEC2, párr. 85 i).

³ REP24/CAC, párr. 260.

⁴ REP25/NE, párrs. 68-71.

⁵ CX/EXEC 22/83/4, Apéndice 2.

Cuadro 1: Propuestas para emprender nuevos trabajos o revisar una norma presentadas por órganos auxiliares activos

Nota: Estas propuestas están disponibles en español, francés e inglés y pueden consultarse [aquí](#).

Número	Comité/Proponente	Propuesta de nuevo trabajo	Referencia y documento del proyecto
1.	CCAFRICA	Norma regional para el pescado seco (con o sin sal) braseado o hervido (África)	REP25/AFRICA, párrafo 62 i), Apéndice IV
2.	CCNASWP	Norma regional para la nuez de galip (América del Norte y Pacífico Sudoccidental)	REP25/NASWP, párrafo 83 i), Apéndice IV
3.		Norma regional para la harina de rima (América del Norte y Pacífico Sudoccidental)	REP25/NASWP, párrafo 83 ii), Apéndice V
4.	CCFFV	Norma para la cúrcuma fresca	REP25/FFV, párrafo 89 i), Apéndice VI
5.		Norma para el brécol fresco	REP25/FFV, párrafo 92 ii)
6.	CCFA	Lista de prioridades de sustancias propuestas para su evaluación por el JECFA	REP25/FA, párrafo 133 i), Apéndice XI
7.		Nuevo trabajo sobre anteproyectos de disposiciones sobre aditivos alimentarios para su inclusión en la NGAA	REP25/FA, párrafo 109 iv), Apéndice IX
8.	CCCF	Revisión del <i>Código de prácticas para el control de malezas a fin de prevenir y reducir la contaminación de los alimentos y los piensos con alcaloides de pirrolizidina</i> (CXC 74-2014)	REP25/CF18, párrafo 90 ii) y Parte I del Apéndice VI
9.		Revisión del <i>Código de prácticas para reducir la aflatoxina B1 presente en las materias primas y los piensos suplementarios para animales productores de leche</i> (CXC 45-1997)	REP25/CF18, párrafo 102 ii), Apéndice VII
10.		Código de prácticas para prevenir y reducir la presencia de alcaloides del tropano en los alimentos y los piensos	REP25/CF, párrafo 106 ii), Apéndice VIII

Número	Comité/Proponente	Propuesta de nuevo trabajo	Referencia y documento del proyecto
11.	CCPR	Lista de prioridades en materia de plaguicidas para evaluación por la JMPR	REP25/PR, párrafo 279 i), Apéndice VIII
12.	CCASIA	Conversión de la <i>Norma regional para productos a base de alga nori</i> (CXS 323R-2017) en una norma internacional	REP25/ASIA, párrafo 141, Apéndice VIII

Cuadro 2: Propuestas para emprender nuevos trabajos o revisar una norma presentadas por miembros

Número	Comité/Proponente	Propuesta de nuevo trabajo	Referencia y documento del proyecto
1.	Emiratos Árabes Unidos	Norma para la leche de camella pasteurizada	CL 2025/50-CAC, Apéndice I (Parte 2)
2.	Unión Europea	Nuevo trabajo sobre la elaboración de principios para el análisis de riesgos de fuentes de alimentos y sistemas de producción nuevos	Apéndice II del presente documento

APÉNDICE I
SOLO EN EL IDIOMA ORIGINAL

**COMMENTS ON THE PROPOSAL FOR
DEVELOPMENT OF A STANDARD FOR PASTEURIZED CAMEL MILK**

BACKGROUND

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

EXPLANATORY NOTES ON THE ANNEX

2. The comments received are presented in a table format, with two columns as follows:
 - **First column** – Presents the comments with the rationale.
 - **Second column** – Presents the provider of the comments (name of Member or Observer).

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

ANNEX

COMMENTS IN REPLY TO CL 2025/50-CAC

Submitted by

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

GENERAL COMMENTS

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

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

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

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

SPECIFIC COMMENTS

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

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

COMMENT	MEMBER / OBSERVER
No, the United States has not encountered trade issues regarding pasteurized camel milk nor camel milk products.	USA
No.	FIA
IDF is not aware of any trade issues regarding pasteurized camel milk nor camel milk products.	IDF/FIL
Taking into account the gap analysis in Appendix II, what do you consider to be the gaps, if any, that would support the need for new work on camel milk?	
It would appear from the gap analysis undertaken and presented at Appendix II that the existing food safety and quality provisions in Codex texts would be inclusive of camel milk.	Australia
Costa Rica considers that the analysis presented in Appendix II clearly demonstrates the existence of regulatory gaps that justify the initiation of new work in the field of camel milk. In particular, the absence of authenticity criteria that would allow this product to be differentiated from other types of milk, which is essential to prevent adulteration and fraud that could mislead consumers in their purchasing decisions or deceive them. Furthermore, it is noted that the current Codex standards for milk and milk products do not take into account the technological and compositional characteristics of camel milk, such as its protein percentage, fat content, and total milk solids, among others, in order to guarantee the authenticity and quality of the product. Having a specific standard, such as the one proposed, would reduce inconsistencies between national and regional standards on key aspects such as minimum fat and non-fat solids content, which would help to avoid possible technical barriers to international trade and facilitate regulatory harmonization processes.	Costa Rica
N/A	Egypt
-دولة ومعايير ومواصفات غياب (Codex) -الميكروبولوجية السلامة عن العلمية الى بيانات نقص -الملائم الصناعات والمعالجة الى تكنولوجيا محدودية -الوظيفة في الغذاء القيمة حول المؤثرة الأدلة قلة -الدول والتسويق الى تجارة أنظمة في ثغرات	Iraq
In many camel milks produced countries there is no statistical data collection on camel milk production/consumption/sales.	Kazakhstan
The analysis has not established any gaps within the existing codex standards. While the codex standards are not specific to pasteurized milk, the development of an international standard for pasteurized camel milk may not have much significance on international trade given the short lifespan of pasteurized milk products. However, such a standard would contribute to consumer protection at country level and less on international trade given the shelf life of the product.	Kenya
As New Zealand is not a producer or trader in camel milk and camel milk products we do not have any specific comments on the questions listed under Area 1 other than on the gap analysis. From New Zealand's perspective the gap analysis presented in Appendix II confirms the general conclusion that existing Codex texts are adequate to cover the issues of labelling and product authentication raised by camel milk producing countries. These existing Codex texts that apply to all milk products are equally applicable to camel milk products. This confirms that no adjustments to existing Codex texts are required. In support of the gap analysis on protection against adulteration we note milk from all species is susceptible to fraud and adulteration. It would be more	New Zealand

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

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

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

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

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

COMMENT	MEMBER / OBSERVER
product is commonly consumed and would strengthen conditions for fair trade, especially in light of the risks of adulteration and fraud.	
Yes, the priority is to prevent fraud and maintain the quality and health value of these products.	Egypt
According to the Criteria for the establishment of work priorities, prioritizing new work requires not only production data but also data on consumption and international trade. Since the project document does not sufficiently illustrate the consumption data for this product, it is difficult for Indonesia to ascertain the urgency or high priority of developing this international standard at this time.	Indonesia
نعم	Iraq
Developing an international standard for pasteurized camel milk or camel milk products is a priority for Kazakhstan	Kazakhstan
Yes, this is a priority as camel milk is an important food commodity in ASAL countries/regions and therefore the need for consumer protection and trade facilitation.	Kenya
Camel milk is of strategic importance for rural livelihoods in Mongolia, particularly in desert and steppe regions. National data shows a clear upward trend in production, including small-scale industrialization (pasteurized, powdered, and fermented products). 24, Mongolia exported 61.9 kg of camel milk products to China, marking the start of formal trade. This underlines the importance of harmonized Codex standards to expand market opportunities.	Mongolia
New Zealand is not a producer or trader of camel milk or camel milk products. The project document and discussion paper have not demonstrated a compelling need to initiate work on developing a standard for pasteurised camel milk, or a standard for other camel milk products. The criteria for prioritisation in the Codex Procedural Manual, considering the gap analysis in Appendix II, alongside other information provided in the CL does not support that this work should be a priority for Codex. We do, however, have an interest in the issue as the host government of CCMMP.	New Zealand
From the U.S. perspective, development of an international standard for pasteurized camel milk is not a priority. A new standard is not necessary for consumer protection or fair practices in food trade because existing Codex texts apply and address potential concerns identified by the proponents of the new work.	USA
No, it is not a priority to FIA for Codex to develop an international standard for pasteurised camel milk or camel milk products. The prioritisation criteria in the Codex Procedural Manual has a general criterion relating to consumer protection, and we do not believe that a new standard is necessary for consumer protection as there are sufficient existing provisions in existing Codex texts.	FIA
It is not a priority for us that Codex develops an international standard for pasteurized camel milk nor camel milk products. The prioritization criteria in the Codex Procedural Manual has a general criterion relating to consumer protection. We do not believe that a new standard is necessary for consumer protection as, in this case, there are sufficient existing provisions in existing Codex texts.	IDF/FIL
Would you be interested in and willing to participate in this work if Codex initiates the process to undertake new work based on the attached proposal?	

COMMENT	MEMBER / OBSERVER
Costa Rica wishes to express its desire to contribute constructively to the development of this standard, ensuring that it is technically sound, internationally applicable, and facilitates both the protection of public health and transparency in trade.	Costa Rica
Yes, we are interested	Egypt
نعم	Iraq
Yes, Kazakhstan is interested in and willing to participate in this work	Kazakhstan
Yes, - Kenya is willing to participate in the process in order to collect and contribute relevant data that will facilitate the development of the standard considering the high camel milk production within the country. - Kenya is also willing to lead or join the working group/task force in the development of this standard.	Kenya
Developing a Codex standard is therefore a priority for Mongolia, and we express willingness to actively participate by sharing data, technical expertise, and national perspectives on Bactrian camel milk.	Mongolia
Although the United States believes that it is premature to develop a Codex standard, if the new work proposal were to be accepted, we would be interested, engaged, and willing to support the effort and help ensure alignment with existing standards. In particular, if new work were undertaken, the United States is of the view that care should be taken to ensure any standard for camel milk is complementary—and not duplicative or confounding—to the existing robust body of Codex standards that uphold the trade of milk and milk products globally. The existing body of Codex references already support and facilitate the trade of milk and milk products, including that of camel milk, and if undertaken, a standard for camel milk should address only science-based safety and quality factors where camel milk is not already covered by Codex standards. Where safety and quality are already covered by other standards, reference should be made to those standards without additions. As mentioned above, the United States has concerns that the specificities of camel milk vis-à-vis other species' milk require further evaluation before a sufficiently founded scientific basis is established to support standard development.	USA
FIA does not support the new work.	FIA
Although IDF does not support the work progressing, IDF as the global expert voice on milk and milk products will remain engaged on any further work should this topic progress.	IDF/FIL
Area 4: Mechanism for how any future work on this could be undertaken	
In your view, if considered a priority and approved by CAC, what might be the appropriate mechanism for undertaking the proposed work?	
If work were to be undertaken it should be undertaken by the body with the most relevant expertise to address the agreed upon problem.	Australia
Costa Rica considers that the most appropriate mechanism would be to develop the standard through a working group by correspondence, led by the Codex Committee on Milk and Milk Products (CCMMP), in close coordination with the relevant horizontal committees on safety, contaminants, additives, methods of analysis, and labeling. This approach would ensure that the specific characteristics of camel milk are integrated in a manner consistent with general Codex texts, avoiding duplication of effort and ensuring a result consistent with the mandate to protect consumer health and promote fair practices in international trade. Additionally, it is important that the new standard refer to the provisions established in the General Standard for the Labeling of Prepackaged Foods (CXC 1-1969) and the General Standard for the Use of Dairy Terms (CXC 206-	Costa Rica

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

APÉNDICE II**Propuesta de nuevo trabajo sobre la elaboración de principios para el análisis de riesgos de fuentes de alimentos y sistemas de producción nuevos**

El documento de debate y el documento del proyecto pueden consultarse [aquí](#).