

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

OTHER BUSINESS AND FUTURE WORK

(Comments of Malaysia, Republic of Korea, East African Community, International Daily Federation)

Malaysia

Malaysia thanks Singapore and China for preparing this new work proposal.

At present, Malaysia does not permit the production or marketing of cell-based food in the country since there is still limited information on the safety assessment of these products and we look forward for clearer guidance by Codex or other international organizations especially the FAO and WHO.

We have been following the development of these proposals and relevant ongoing work by the FAO and WHO, it is our view that the scope of the new work now is clearer.

Recognizing the importance of this proposed work, Malaysia supports this new work and we believe that JECFA would have a significant role in its development. We would like to emphasize the need for the guidelines to take into account the outcome of on-going work by FAO and WHO.

Republic of Korea

The Republic of Korea supports CCFA in undertaking the development of guidelines for food safety assessment of cell culture media components in cell-based food production. Because new food sources and production systems(NFPS) have been underscored, highlighting their importance and the challenges of establishing international frameworks and guidelines.

East African Community

EAC Position

The EAC takes note of the proposal to develop guidelines for the food safety assessment of cell culture media components in cell-based food production. While we recognize the potential of cell-based foods as an emerging food technology, we are of the view that it is essential to address several key questions and considerations before proceeding with the development of such guidelines. These questions are aimed at ensuring that the proposed work is grounded in a clear understanding of the current landscape, addresses the needs of all Codex Members, and aligns with the principles of science-based risk assessment and harmonization.

1. Understanding the Global Trade Context

Codex standards are primarily developed for products moving in international trade. Given that cell-based foods are still in the early stages of commercialization, what data or analysis is available to assess the current and projected global trade in these products? How will this information inform the nature and scope of the standards to be developed?

2. Harmonization with Existing National Regulations

Before developing international guidelines, it is important to understand the current national regulations that exist for cell-based foods. What steps will be taken to map and analyze existing regulatory frameworks in Member States? How will the proposed guidelines ensure harmonization with these frameworks?

3. Establishment of Residue Limits and Safety Thresholds

The discussion paper acknowledges that some cell culture media components may remain as residues in the final

product. However, it does not address how residue limits will be established. What methodologies will be used to determine acceptable daily intake (ADI) or other safety thresholds for these residues? How will the guidelines ensure that these limits are scientifically robust and protective of consumer health?

4. Coordination Between Codex Committees

The discussion paper briefly mentions that the Code of Hygienic Practice for cell-based foods will be submitted to the Codex Committee on Food Hygiene (CCFH). How will the work of CCFA and CCFH be coordinated to avoid duplication or conflicting standards? What mechanisms will be put in place to ensure consistency and coherence in the development of Codex standards for cell-based foods?

The EAC emphasizes the importance of addressing these questions and considerations before proceeding with the development of guidelines for the food safety assessment of cell culture media components in cell-based food production. We believe that a thorough understanding of the global trade context, existing national regulations, and the needs of developing countries is essential to ensure that any guidelines developed are relevant, practical, and inclusive.

International Dairy Federation (IDF)

General support for safety assessments

IDF is generally supportive of safety assessments being conducted for cell-based food, including cell culture media components. In particular, substances that do not have a history of use in food such as growth factors and hormones should undergo robust safety assessments. IDF also agrees that a tiered system would be appropriate to place such substances in a higher tier than, for example, those with historic use in food like vitamins. IDF can therefore support the development of guidelines to aid in international harmonization of how safety assessments are conducted for this purpose.

However, IDF has specific concerns around the relevance of referencing processing aids in this work.

Relevance of processing aids

IDF proposes that processing aids are not referenced in this work to avoid unnecessary confusion and contention as the proposed work can progress regardless of whether cell culture media components are processing aids.

It may be contentious as to whether specific functions of cell culture media components are processing aid functions. This could lead to time consuming debate that does not further the primary goal of establishing guidelines for safety assessments.

For example, nutrients may not be for the purpose of “treatment or processing of raw materials, foods, or ingredients” (CAC/GL 75-2010) which is a requirement of processing aids.

Another example is that certain types of cell culture media components may continue to have a function, albeit unintended, in the final product. For example, growth factors or hormones may be carried over into the final product and can have ongoing bioactivity. This would not fit under the requirement that “any residues of processing aids remaining in the food after processing should not perform a technological function in the final product” (CAC/GL 75-2010).