

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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CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-sixth Session

COMMENTS FROM BRAZIL, URUGUAY, PARAGUAY, GUYANA, AND JAMAICA

Agenda item 10: Discussion paper on the development of a guideline for the conduct of food safety assessment of cell culture media components used in the production of cell-based foods

The above mentioned members recognize the importance of advancing discussions on innovative food technologies, including cell-based foods, and remains supportive of international dialogue on this subject. However, at the present stage, we consider that the development of the proposed guideline is premature and that further progress in international harmonization of a definition for cell-based products and the related production systems is required before initiating substantive work within Codex.

The primary concern relates to the current lack of essential scientific and technical elements necessary to underpin a robust risk assessment framework. In particular, there is an absence of sufficient data to support comprehensive food safety risk assessments of cell culture products. Additionally, key aspects remain undefined, including the characterization of the final product and the standardization of the production processes involved. These gaps significantly limit the ability to develop science-based, internationally harmonized guidance.

Furthermore, as noted in previous discussions, including those aligned with the outcomes of CCFH55, it is evident that international consensus has not yet been achieved. Ongoing work within the Food and Agriculture Organization has not yet resulted in agreed definitions for either the products or their production processes. This underscores the need for continued technical development and alignment at the international level before advancing new work within Codex.

We also highlight the importance of adhering to established Codex principles and its procedural manual, which require that new work be supported by a solid and broadly accepted scientific basis and, in that way, advancing this work at this stage could set a precedent for initiating standard-setting activities without a sufficiently mature scientific and regulatory foundation.

At this time, such a foundation is still under development. Premature initiation of guideline development may risk inconsistencies, duplication of efforts, and inefficiencies in the use of limited international resources. In this context, further scientific and technical development would be a more appropriate first step before considering standard-setting work in the CCFA.

In addition, considering current constraints in financial and technical resources that Codex have been facing, it is essential to prioritize issues that are more mature and of immediate relevance to public health and international trade. The limited level of global trade in cell-based food products further supports the need to defer this work until greater regulatory clarity and market development are achieved. Furthermore, considering most realities for developing countries, advancing work without sufficient clarity may create additional regulatory burdens and uncertainties.

In light of these considerations, we do not support advancing this document as a new work within this Committee at this stage. We consider appropriate to keep the topic dormant until further technical development and international alignment are necessary before such work can be undertaken.

We therefore encourage continued discussion in relevant international fora, especially the FAO, and recommend revisiting this issue within Codex only after further scientific, technical, and regulatory progress has been achieved.