

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CODEx ALIMENTARIUS COMMISSION

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NEW WORK PROPOSAL ON THE DEVELOPMENT OF A GROUP STANDARD FOR CERTAIN TYPES OF MILLETS

BACKGROUND

1. At the 46th session of the Codex Alimentarius Commission (CAC46)(2023), under the agenda item “Any other business”, India, noting 2023 being the International Year of Millets, presented a proposal for new work ([CRD33](#)) for development of a group standard for certain millets, which was accompanied by a project document.
2. CAC46 welcomed the proposal to develop a group standard for certain types of millets to reflect the growing international trade in these products and requested that the Codex Secretariat further assess the proposal for completeness and issue a Circular Letter (CL) to solicit comments from Members and Observers before possibly bringing it to the attention of CCEXEC for critical review and thereafter consideration by CAC47 for approval as new work ([REP23/CAC](#), paragraph 228).
3. Following CAC46, and a review of the initial proposal by the Codex Secretariat and the Host Secretariat of the Codex Committee on Cereals and Pulses (CCCPL), the project document has been revised and a discussion paper prepared by India. The updated proposal addresses the issues highlighted by CAC46 and takes into consideration the information that needs to be examined by the Executive Committee in the critical review of new work proposals.
4. The CL requesting comments on the proposal was issued in October 2024 ([CL 2024/60-CAC](#)) with an extended deadline of November 12. Members and Observers were invited to submit general comments as well as specific comments across four key areas, addressing a total of eleven questions.

SUMMARY OF COMMENTS IN REPLY TO CL 2024/60-CAC

5. A total of 7 Members and 1 Member Organization replied to *CL 2024/60-CAC- Request for comments on a proposal for development of a group standard for certain types of millets*. Comments are attached as Appendix I to this document.

General Comments

6. Members expressed the following views:
 - The new work was considered beneficial, as millets and their products were becoming increasingly traded globally and had the potential to gain popularity as healthy foods due to their nutritional benefits.
 - Concerns were raised about existing trade barriers and whether the trade volume of minor/pseudo millets justified the development of a new standard.

Area 1: Consumer health protection and fair-trade practices (questions bullet point 1 to 3)

7. Some Members recommended addressing additional food safety aspects like pesticide residues, mycotoxins, and other contaminants in the discussion paper. Others confirmed that the paper comprehensively covered existing food safety and quality concerns, with no further issues identified. Additionally, some Members noted the absence of known trade issues related to millets.

Area 2: Nature of the standard that might be developed (questions bullet point 4 to 7)

8. Regarding the inclusion of various millet types in the proposed group standard, some Members suggested that provisions for specific types be included as annexes. Concerns were raised about the inclusion of pseudo-millet, such as buckwheat and amaranth. Key issues highlighted included the need to address food safety concerns, including contaminants and allergens, and to specify quality attributes. The inclusion of relevant existing Codex standards for sorghum and pearl millet was also emphasized. It was recommended that further discussions take place to refine the scope of the standard and ensure consistency with existing Codex standards.

Area 3: Importance of work for Members (questions bullet point 8 to 9)

9. Members expressed varying views. Some Members highlighted the potential benefits such a standard would bring to national regulation, trade facilitation, and consumer confidence in millet products. Other Members questioned whether the initiative would add value to millet trade in their countries, given the limited use of millet for human food and the lack of standardized grading systems. Concerns regarding the scope of the work were raised, with some suggesting that the intended use of millets (e.g., human consumption or animal feed) should be clearly defined. Several Members expressed interest in participating in the development of the standard and committed to contributing relevant data and technical input.

Area 4: Mechanism for how any future work on this could be undertaken (question bullet point 10)

10. Members expressed differing views on the working modalities for developing a group standard for millets. Some Members supported the idea of an Electronic Working Group (EWG) under CCCPL, emphasizing its flexibility and the involvement of experts from both producing and consuming countries. However, there were concerns about working by correspondence, particularly the challenges in addressing differing opinions within the given timeframes. Other Members suggested that a more traditional approach to reactivating CCCPL with virtual meetings might be more effective post-pandemic. One Member emphasized the need for robust support to reopen CCCPL, while also proposing that an EWG could refine the discussion paper prior to potential approval by the CAC.

RECOMMENDATION

11. CAC47 is invited to:

- take note of the comments received;
- decide on the appropriate way forward, including:
 - whether the discussion paper and project document (see CL 2024/60-CAC, Appendix I) require further refinement, and if so, the necessary steps for progressing the work; or
 - whether to approve the new work proposal, and if so, recommend the most suitable working mechanism to undertake the new work; and
- In case there is agreement to approve this as new work, consider the most efficient approach for advancing the development of the group standard for millets, e.g. by reactivating CCCPL to work by correspondence or by meeting a virtual meeting.

**COMMENTS IN REPLY TO CL 2024/60-CAC - REQUEST FOR COMMENTS ON A PROPOSAL
FOR THE DEVELOPMENT OF A GROUP STANDARD FOR CERTAIN TYPES OF MILLETS**

Comments by Burundi, Egypt, European Union, Iraq, Maldives, Peru, Thailand, USA

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
<p>The United States appreciates the opportunity to comment on the proposal for development of a group standard for certain types of millets. The United States has some general concerns related to whether there are existing trade barriers and whether the trade volume for those minor/pseudo millets would warrant a new standard. Although a sentence in the introduction of the discussion paper indicates that “With an anticipated increase in market of millets and millet- based products is expected by 2025, with an estimated value of over \$9 billion to over \$12 billion,” it is unclear to the United States the breakdown of minor/pseudo millets versus major millets that are already covered under the existing Codex standards in the estimated values.</p> <p>The United States has also provided some additional specific comments on Areas 1-4 below.</p>	<p>USA</p>
<p>Perú no tiene observaciones, gracias.</p>	<p>Peru</p>
<p>Thailand is of an opinion that this new work will be beneficial as millets and its products become more globally traded and have a potential to be popular healthy foods in the future due to their nutritional benefits.</p>	<p>Thailand</p>
<p>Maldives acknowledges the new work done by India. As Maldives is mostly depending on import and millets as mentioned is considered a staple, having internationally recognized standard will help the Maldives to ensure the safety and quality of the millets and its products imported to the country.</p>	<p>Maldives</p>

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
AREA 1: CONSUMER HEALTH PROTECTION AND FAIR-TRADE PRACTICES	
We are of the view that pesticide residues, mycotoxin especially aflatoxin and other contaminants are key food safety aspects that should be addressed in the discussion paper. Additionally, defects that can cause safety concerns should also be included in the paper.	Thailand
<p>Are you as a producing and/or consuming Member or as an Observer aware of any additional food safety and/or quality concerns regarding millets apart from those addressed in the discussion paper?</p> <p>No</p>	Iraq
<p>Are you as a producing and/or consuming Member or as an Observer aware of any additional food safety and/or quality concerns regarding millets apart from those addressed in the discussion paper?</p> <p>Burundi n'est pas au courant d'autres problèmes de salubrité et/ou de qualité des aliments concernant les millets en dehors de ceux abordés dans le document de travail</p>	Burundi
<p>Are you as a producing and/or consuming Member or as an Observer aware of any additional food safety and/or quality concerns regarding millets apart from those addressed in the discussion paper?</p> <p>In the discussion paper, it appears that the common quality parameters and common reference to safety parameters such as contaminants, hygiene, food additives and labelling requirements are to be considered for inclusion in the proposal for the group standard. The United States has no additional food safety and/or quality concerns to add.</p>	USA
<p>Are you as a producing and/or consuming Member or as an Observer aware of any additional food safety and/or quality concerns regarding millets apart from those addressed in the discussion paper?</p> <p>No, based on our current knowledge and understanding, there are no additional food safety or quality concerns regarding millets that have not been adequately addressed in the discussion paper. The paper comprehensively covers the primary risks and potential issues associated with millet production, processing, and consumption.</p>	Egypt
<p>Are there any trade issues regarding millets?</p> <p>Non</p>	Burundi

<p>Are there any trade issues regarding millets?</p> <p>The United States is unaware of trade issues regarding certain millets.</p>	<p>USA</p>
<p>Are there any trade issues regarding millets?</p> <p>No</p>	<p>Egypt</p>
<p>AREA 2: NATURE OF THE STANDARD THAT MIGHT BE DEVELOPED</p>	
<p>We realized that group standard for certain types of millets can be developed. In case where there are different provisions specific to some type of millets, these can incorporate as annexes to the main text, which contains the common provisions of all millets classified in that group standard. However, we suggest that the selection of types of millets into a group standard should ensure alignment and comprehensiveness with the Codex Classification for Foods and Feeds (CXA 4-1989), as some proposed types are not included in the Subgroup of Sorghum Grain and Millet. For example, amaranth grain is classified in the Subgroup of Wheat, similar grains, and pseudocereals without husks. Similarly, buckwheat is classified in the Subgroup of Barley, similar grains, and pseudocereals with husks. Therefore, title of standard and scope should be clear. Moreover, consideration should be given to existing Codex standards for Sorghum Millet (CXS 172-1989) and Pearl Millet (CXS 169-1989).</p>	<p>Thailand</p>
<p>The United States has no specific comments on Area 2 because it is still not clear to us on whether a new standard for certain millets is warranted. If there is agreement to start a new standard, then the United States would strongly encourage the work be done in a group standard approach instead individual standards for each type of millet. This is a more efficient way of creating standards that will also require less time to complete. This is a similar approach agreed and being applied to work in the Codex Committee on Spices and Culinary Herbs.</p>	<p>USA</p>
<p>Is it amenable to use a group standard approach for certain types of millets instead of individual standards for each type of millet bearing in mind that Codex standards should be more general and inclusive?</p> <p>I think no, we not need to additional more types of millets and inclusion existing relevant Codex texts and no more add in the scope</p>	<p>Iraq</p>
<p>Is it amenable to use a group standard approach for certain types of millets instead of individual standards for each type of millet bearing in mind that Codex standards should be more general and inclusive?</p> <p>The EUMS agree to define a corresponding Codex standard due to the increasing importance of and interest in millet and developing a group standard would make sense. However, the EUMS question whether it would be appropriate to also consider the two pseudo-millets (buckwheat and amaranth) under the same standard. There is no botanical relationship, as millet is invariably a sweet grass, whereas buckwheat is a knotweed plant and amaranth is a foxtail plant. This could lead to the two pseudo-millets being lost in the standard and not being recognised. Should they also be considered in this standard, the EUMS are of the opinion that quinoa should also be addressed, as it is also a pseudo-millet. Pending further discussions, the EUMS would favour a separate standard for pseudo-millets in order to have a clear separation here.</p>	<p>European Union</p>
<p>Is it amenable to use a group standard approach for certain types of millets instead of individual standards for each type of millet bearing in mind that Codex standards should be more general and inclusive?</p>	<p>Burundi</p>

Burundi trouve que c'est possible	
<p>Is it amenable to use a group standard approach for certain types of millets instead of individual standards for each type of millet bearing in mind that Codex standards should be more general and inclusive?</p> <p>Yes, a group standard approach for certain types of millets is feasible. Many millet varieties share similar characteristics in terms of nutritional composition, processing methods, and potential hazards. A group standard could provide a more efficient and flexible framework for regulating these millets, while still addressing their specific needs.</p>	Egypt
<p>Are there any additional types of millets that should be considered for inclusion in the group standard?</p> <p>Burundi n'en a pas</p>	Burundi
<p>Are there any additional types of millets that should be considered for inclusion in the group standard?</p> <p>No</p>	Egypt
<p>If work were to be undertaken on a group standard for certain types of millets, should it also incorporate existing relevant Codex texts?</p> <p>Codex standards already exist for sorghum and pearl millet. While the standard for sorghum applies to the whole grain, the standard for pearl millet was defined for the ready-to-eat flour. If a group standard being developed, the question arises as to whether these two types of millet should not also be considered there, thus covering all types of millet in one standard.</p>	European Union
<p>If work were to be undertaken on a group standard for certain types of millets, should it also incorporate existing relevant Codex texts?</p> <p>Burundi trouve qu'il serait bon de les intégrer</p>	Burundi
<p>If work were to be undertaken on a group standard for certain types of millets, should it also incorporate existing relevant Codex texts?</p> <p>Yes, it is essential to incorporate existing relevant Codex texts into the development of a group standard for millets. This will ensure consistency with other Codex standards and avoid duplication of efforts. Some relevant Codex texts that could be considered</p>	Egypt
<p>What should the exact scope of the work? For example, what forms of millets should be included? Should they be in a state ready for their intended use for human consumption?</p> <p>Burundi propose de se limiter au millets prêts à la consommation humaine</p>	Burundi

<p>What should the exact scope of the work? For example, what forms of millets should be included? Should they be in a state ready for their intended use for human consumption?</p> <p>The EUMS consider that it makes sense to define the planned group standard for flour from millet that is intended directly for human consumption, comparable to the standard for pearl millet.</p> <p>In light of the considerations above, the EUMS are of the opinion that further exchanges should take place on the precise scope of the new standard.</p>	<p>European Union</p>
<p>What should the exact scope of the work? For example, what forms of millets should be included? Should they be in a state ready for their intended use for human consumption?</p> <p>The scope of the work should include the following:</p> <ul style="list-style-type: none"> • Forms of millets: The standard should cover both whole grains and processed forms of millets, such as flours, grits, and flakes. • Intended use: The standard should focus on millets intended for human consumption. • Food safety: The standard should address food safety aspects, including contaminants, allergens, and good hygienic practices. • Quality attributes: The standard should specify quality attributes such as moisture content, protein content, and sensory characteristics. • Labeling: The standard should provide guidelines for labeling millets. 	<p>Egypt</p>
<p>AREA 3: IMPORTANCE OF WORK FOR MEMBERS</p>	
<p>Is developing a group standard for certain types of millets a priority that would add value to millet trade in your country or benefit your national legislation?</p> <p>No</p>	<p>Iraq</p>
<p>Is developing a group standard for certain types of millets a priority that would add value to millet trade in your country or benefit your national legislation?</p> <p>Burundi trouve que cette élaboration profitera à la régulation nationale car même si certains types ne sont pas produits localement, ils sont importés car sont utiles</p>	<p>Burundi</p>
<p>Is developing a group standard for certain types of millets a priority that would add value to millet trade in your country or benefit your national legislation?</p> <p>Most of the millet varieties grown in the United States are primarily used as forage or cover crops. As for grain uses, they are primarily for livestock or bird feed (https://extension.missouri.edu/media/wysiwyg/Extensiondata/Pub/pdf/agguides/crops/g04164.pdf).</p>	<p>USA</p>

<p>If millet grains are used for human food, then they are considered a specialty crop and are not transported or stored in bulk commodities like corn, wheat or soybeans.</p> <p>Currently in the United States, there are no classes, subclasses, or grades for millet seed. Inspection of millet seed is on a factor only basis. Factors analyzed are foreign material and test weight per Winchester bushel (https://www.ams.usda.gov/sites/default/files/media/FGIS9180_72.pdf)</p> <p>The United States is unsure whether a group standard for certain types of millets as a priority would add value to millet trade in the United States.</p> <p>If Codex initiates the process to undertake new work as described in the proposal, the scope of the work needs to be clearly defined, based on the intended use of certain millets (e.g. grains for human consumption, feed for livestock or bird, etc.).</p>	
<p>Is developing a group standard for certain types of millets a priority that would add value to millet trade in your country or benefit your national legislation?</p> <p>Yes, developing a group standard for certain types of millets would be a priority for our country. A Codex standard would provide a recognized and internationally accepted framework for regulating millets, which could enhance the safety and quality of our millet products. This, in turn, could increase consumer confidence in our millet-based products.</p> <p>Additionally, a Codex standard could help to harmonize national standards related to millets, reducing trade barriers and facilitating the movement of millet products across borders.</p>	Egypt
<p>Is developing a group standard for certain types of millets a priority that would add value to millet trade in your country or benefit your national legislation?</p> <p>Maldives believes that such standard will facilitate the trade and it can be adopted to country's food safety legislation.</p>	Maldives
<p>Would you be interested in participating in this work if Codex initiates the process to undertake new work as described in the attached proposal?</p> <p>We are interested in participating in this work. Additionally, we realize that the development of a standard on millets is a priority in our country.</p>	Thailand
<p>Would you be interested in participating in this work if Codex initiates the process to undertake new work as described in the attached proposal?</p> <p>Burundi va identifier les experts pour participer dans les travaux</p>	Burundi

<p>Would you be interested in participating in this work if Codex initiates the process to undertake new work as described in the attached proposal?</p> <p>Yes, we would be very interested in participating in the development of a group standard for millets. We would be willing to participate in working groups, provide technical input, and contribute to the development of the standard</p>	<p>Egypt</p>
<p>Would you be interested in participating in this work if Codex initiates the process to undertake new work as described in the attached proposal?</p> <p>If such work is initiated, the Maldives will share any relevant data in the country where it is necessary. As Maldives is not a producer, the country would only have import data.</p>	<p>Maldives</p>
<p>AREA 4: MECHANISM FOR HOW ANY FUTURE WORK ON THIS COULD BE UNDERTAKEN</p>	
<p>In your view, if considered a priority and approved by CAC, what would be the appropriate mechanism for undertaking the proposed work?</p> <p>In our view, the work on commodity standards for millets should be undertaken by CCCPL. However, working by correspondence may have limitations, especially with the time provided for information or comments and the difficulties in concluding different views.</p>	<p>Thailand</p>
<p>In your view, if considered a priority and approved by CAC, what would be the appropriate mechanism for undertaking the proposed work?</p> <p>By EWG</p>	<p>Iraq</p>
<p>In your view, if considered a priority and approved by CAC, what would be the appropriate mechanism for undertaking the proposed work?</p> <p>Groupes électroniques de travail et collecte de différents données auprès de différents Pays producteurs</p>	<p>Burundi</p>
<p>In your view, if considered a priority and approved by CAC, what would be the appropriate mechanism for undertaking the proposed work?</p> <p>Concerning the working modalities, the EUMS are not in favour of the proposed approach to reactivate CCCPL to work by correspondence as it was done in the case of CCFFP. The EUMS consider that a normal reactivation of CCCPL is more appropriate since post-pandemic way of working allows virtual meetings. The EUMS are of the view that an EWG could be established under CCCPL.</p>	<p>European Union</p>

<p>In your view, if considered a priority and approved by CAC, what would be the appropriate mechanism for undertaking the proposed work?</p> <p>Since the CCCPL has been adjourned sine die since 2020, the United States as host country of the CCCPL, believes that robust support for this new work proposal would be needed to warrant reopening the committee. It is also important to determine if CAC47 will agree to start new work on a group standard for certain types of millets, or if more time will be needed to further refine the discussion paper.</p> <p>The United States believes that an electronic Working Group (EWG) to further refine the discussion paper at CAC47 is the most appropriate next step that may then be considered by CAC48 for approval as new work. Given that this would potentially be the only issue before the CCCPL, the work would progress via an EWG that would need to be re-instated annually at the CAC for the pre-determined timeframe established until a virtual session of the CCCPL may finalize the potential draft group standard.</p>	<p>USA</p>
<p>In your view, if considered a priority and approved by CAC, what would be the appropriate mechanism for undertaking the proposed work?</p> <p>The most appropriate mechanism for undertaking the proposed work on a group standard for millets would be to establish a EWG under the umbrella of Codex Committee on Cereals and Pulses. This group could be tasked with developing the standard, drawing upon the expertise of representatives from producing and consuming countries, as well as relevant international organizations.</p> <p>A working group could be formed within the committee to focus specifically on the development of the millet standard.</p>	<p>Egypt</p>