CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda item 1 **EXEC88/CRD03**

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UPDATES ON THE PROPOSAL FOR THE DEVELOPMENT OF NEW WORK ON CAMEL MILK COMMODITY STANDARD

(Submitted by the Coordinator for the Near East on behalf of the United Arab Emirates)

1. Purpose of the Conference Room Document

The United Arab Emirates (UAE) would like to inform the members of the Codex Executive Committee Meeting at its 88th session (CCEXEC88), held in Rome from 14-18 July 2025 about the updates on the Proposal for the development of new work on a camel milk commodity standard based on the implementation of CAC47 Recommendations.

2. Background

In response to the growing demand for camel milk products and their increasing importance in trade, nutrition, and rural development in the countries where it is produced, the UAE initiated a proposal to develop a Codex Standard on Camel Milk Commodity. This work is aligned with the declaration of 2024 as the International Year of Camelids (IYC 2024) by the United Nations and the 47th session of the Codex Alimentarius Commission (CAC47) set out an approach for considering whether this work was needed.

Camel milk is known for its unique composition, particularly the absence of β-lactoglobulin, which offers hypoallergenic benefits, and a high content of β-casein, positioning it as a close analogue to human milk. However, its high market value has made it vulnerable to adulteration with bovine milk, thereby justifying consideration for a need for an international standard ensuring authenticity, safety, and fair trade.

3. United Arab Emirates endeavors in developing a Camel Milk Standard

Several actions were undertaken by the UAE and other supporting Codex Members and Observers, subsequent to the discussions at CCNE11 (Rome November 2023), when the UAE brought forward this item at the regional level.

Following the advice received then, the UAE engaged with a broad range of members and stakeholders and re-evaluated the submission towards a proposed work on an international standard, while ascertaining that the Codex Criteria on new work priorities were fulfilled.

This is a summary of what was carried out:

- Continuous engagement with Members and Observers that started from March 2024 to further reshape the proposal, with emphasis on key observers and contributors such as the International Dairy Federation (IDF), along with engagement with the Codex Secretariat (26 August 2024)
- Organization of structured meetings and discussions with the IDF (14 August 2024) and the host country of the Codex Committee on Milk and Milk Products (CCMMP) (25 June 2024)

- The organization of the International Symposium on the Development of Camel Milk Standard (24-25 September 2024), where significant feedback was received on the proposal that helped re-shape it to its current form
- Informal but structured consultations conducted by the UAE with the **Codex Regional Committees** of: CCNE (9 October 2024- 30 April 2025), CCASIA (14 October 2024-09 July 2025), CCAFRICA (18 October 2024-19- May 2025), CCLAC (28 October- 28 November), CCEURO (12 November), CCNASWAP (26 November 2025) facilitated by the respective coordinators.
- Feedback via correspondence and meetings with experts and industry representatives from both academia and representatives of the Camel milk sector from many countries such as Kazakhstan, Pakistan, Mongolia, France, Mauritania, Morocco, Tunisia, Mali, Niger and Botswana. (May 2024- June 2025).
- The outcomes of the National Working Group of Experts for the Development of Camel Milk Standard which is formed from government entities, laboratories, and Manufacturers from private sector (4 meetings since May 2024).
- Dissemination of Camel milk work in different occasions such as the Dairy Olympics held in Al Ain-Abu Dhabi on 7 to 9 April 2025 where several presentations on camel milk were delivered from professionals and academics from UAE, Mongolia, and Bulgaria.

4. The 47th session of Codex Alimentarius Commission's Recommendations

- At CAC47, the Commission acknowledged the importance of the UAE's proposal and recognized Member support (CRD48 Rev.3)[1]. Following the procedural guidance from CCEXEC87, and to ensure alignment with Codex best practices, CAC47 adopted a structured approach to prepare the proposal for consideration at CAC48 (REP24/CAC). According to the recommendations, New Zealand, as host country of CCMMP, the UAE and the IDF were requested to collaborate on:
- A gap analysis of Codex texts on milk and milk products relevant to camel milk.
- A review and refinement of the Discussion Paper and Project Document initially presented as CRD03[2] of the CAC47.

The process was to include:

- Review of completeness of the documents by Codex and CCMMP Secretariats.
- Gap analysis conducted jointly by UAE, New Zealand, and IDF.
- Revised documentation based on the above steps.
- Issuance of a Circular Letter (CL) to seek feedback from Members and Observers.
- Final submission to the Codex Secretariat for critical review by CCEXEC89 and subsequent consideration by CAC48.

5. UAE Implementation of CAC47 recommendations

Following CAC47, the UAE engaged in an organized consultation and development process between March 2024 and June 2025 with the designated partners: Codex Secretariat, Chair of CCMMP and representatives from IDF. The activities undertaken included:

- Determination of Work Objectives
- A structured gap analysis of Codex horizontal and vertical dairy texts to identify if there are gaps in authenticity as well as aspects related to hygienic practices, presence of contaminants, labelling, and methods of analysis and sampling.

[1] Comments from Bahrain, Egypt, Jordan, Kazakhstan, Libya, Mali, Oman, Republic of Iraq, State of Qatar: CAC47/CRD48 Rev.3 https://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CAC&session=47

[2] Discussion paper on the development of new work on a camel milk commodity standard (Prepared by United Arab Emirates): CAC47/CRD03 https://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CAC&session=47

- Review of the Discussion Paper and Project Document, addressing comments from the Codex Secretariat and CCMMP.
- The suggestions on the content of the Circular Letter that will be issued to Members and Observers are being studied to ensure the appropriate input from members.

5-1- Determination of the work Objectives: the team agreed on the three following Objectives

OBJECTIVE1: Authenticity

The development of a Camel Milk commodity Standard will ensure that Codex standards exist to assist in protecting camel milk products from adulteration when traded internationally. Several codex texts were reviewed to better document the texts relevant to protecting camel milk authenticity. These Texts include the *General Standard for the Use of Dairy Terms* (CXS 206-1999), the *General Standard for the Labelling of Pre-Packaged Foods* (CXS 1-1985) as well as the Draft Guidelines on the Prevention and Control of Food Fraud being developed under the auspices of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS).

OBJECTIVE 2 – Standardized Production & Processing Practices and Product Characteristics

The development of a Camel Milk Commodity Standard will lead to the harmonization of camel milk production and processing conditions and account for specific characteristics of most traded camel milk products. Several Codex texts were reviewed to assess their applicability in light of the specific characteristics of camel milk commodities.

The list of standards that were assessed are:

- *Standard for Milk Powders and Cream Powder* (CXS 207-1999)
- *Standard for Fermented Milks* (CXS 243-2003)
- *Standard for Milkfat Products* (CXS 280-1973)
- *Standard for Butter* (CXS 279-1971)
- *General Standard for the Use of Dairy Terms* (CXS 206-1999)
- *Code of Hygienic Practice for Milk and Milk Products* (CXC 57-2004)
- *Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods* (CXG 21-1997)
- *General Standard for Contaminants and Toxins in Foods and Feeds* (CXS 193- 1995)
- *General Principles of Food Hygiene* (CXC 1-1969)
- *General Standard for Food Additives* (CXS 192-1995)
- *General Standard for the Labelling of Pre-packaged Foods* (CXS 1-1985)
- *General Standard for the Labelling of Non-Retail Containers of Foods* (CXS 346-2021)
- *Recommended Methods of Analysis and Sampling* (CXS 234-1999)

OBJECTIVE 3: Improve trade /export

The following points represent a summary of the rationale as to how an international standard would potentially help improve trade and export provided by UAE (a detailed version will be provided to CCEXEC89):

- An international standard on camel milk will help leveraging the differences in requirements and safety included in the standards that are adopted on national level which helps to reduce trade barriers between countries.
- It is more beneficial for Member countries to have access to an international standard compared to diverse domestic standards which will help to set a clear, internationally agreed guidelines that unify the requirements (composition, hygiene, safety,). which will avoid divergences in the offer and demand cycle.
- An international standard for camel milk will provide a trusted reference point for trade agreements and national regulations helping products to move smoothly across borders.

- An international standard on camel milk will help levelling the playing field between smaller producers, especially in parts of Africa, the Middle East, and Central Asia, often struggling to meet a patchwork of global rules. It creates fairer conditions for different scale producers, opening doors for emerging producers to join international markets on equal terms.
- Codex standards are officially recognized by the World Trade Organization (WTO) as the go-to reference when trade disagreements arise. Countries using Codex as a foundation for their policies are better placed to protect themselves from unfair barriers and challenge protectionist practices when needed.

5-2- Review of the scope of the proposal

The scope of the Project Document consists of Pasteurized Camel Milk to account for either its composition, conditions of production and other aspects related to hygienic conditions and labelling.

The anticipated outcome of the proposed new standard is to ascertain authenticity of Pasteurized Camel Milk, bolstering its trustworthiness to consumers, therefore contributing to the development of camel products and lawful trade.

6. Next Steps and Timeline

The Codex Secretariat will issue a Circular Letter, seeking comments from Members and Observers on the discussion paper and new work proposal. The aim is to issue this within the end of July 2025.