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Comments of the Good Food Institute (GFI)
(CAC Observer¹)

AGENDA ITEM 10

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The Good Food Institute (GFI)² supports the Codex Alimentarius Commission's (CAC) continued interest in new food sources and production systems, including cell-based food production (hereafter referred to as cultivated food³ production).

The proposal for new work put forward jointly by Singapore, China, the Republic of Korea, and Saudi Arabia, inviting CCFH to consider developing a code of hygienic practice for manufacturing cultivated foods, presents an opportunity to build international alignment on hygienic standards for these foods. This work could facilitate harmonized regulation and international trade. Recognizing these advantages, GFI believes that CCFH should support this proposal for new work in a manner that allows for the continued development of this still emerging industry and accommodates responsible innovation as the cultivated food sector matures.

Rationale:

This proposal is timely and well-founded, coming at a moment when the cultivated food industry is well-positioned to expand into new markets and is growing in jurisdictions with existing regulatory regimes. In recent years, cultivated foods have been reviewed and permitted for commercial sale by regulatory authorities in Singapore, the United States, Australia, and New Zealand, and regulatory reviews are underway in Hong Kong, Israel, Switzerland, Thailand, the Republic of Korea, the United Kingdom, and the European Union. While each of these jurisdictions already has requirements in place to ensure hygienic cultivated meat production, the proposed new work presents an opportunity to move toward international alignment and provide a clear point of entry for regulators in countries where cultivated meat has not yet been introduced. As such, this new work should be advanced to promote consistent hygienic expectations and enable the development of the cultivated food sector, while avoiding any implication that existing domestic regulatory systems require modification.

¹ See <https://www.fao.org/fao-who-codexalimentarius/about-codex/observers/detail/en/c/168889/>.

² The Good Food Institute (GFI) is a nonprofit civil society organization and global think tank developing the roadmap for a sustainable, secure, and just protein supply. We identify the most effective solutions, mobilize resources and talent, and empower partners across the food system to make plant-based, cell-cultivated, and fermentation-enabled meat accessible, affordable, and delicious. We are headquartered in the United States and have affiliates in Brazil, Europe, India, Israel, Japan, and the Asia-Pacific region. Senior Regulatory Attorney, Mackenzie Battle, may be contacted at mackenzieb@gfi.org.

³ In this document, the term "cultivated food" is used as a working terminology to indicate food produced through the culturing of cells isolated from animals. This includes, but is not limited to, cells isolated from poultry, bovine, porcine, fish and crustacean sources.

The proposed new work should remain broad enough to accommodate current and future applications of cultivated food production. This approach aligns with Codex's objective of developing forward-looking guidance that ensures food safety and facilitates international trade without impeding innovation or requiring amendments as additional cultivated food products emerge. Since certain Codex Member countries are already well-versed in hygienic requirements specific to cultivated foods, we encourage the delegations from these countries to contribute their technical expertise to ensure the new work is practical for both existing systems and developing new regulatory frameworks, and sufficiently flexible to accommodate a rapidly evolving industry.

We emphasize that although cultivated food production introduces specific hygienic considerations related to its processes and production environment, many of the inputs used in cultivated meat manufacturing and the corresponding hygienic considerations are already well-established within the broader food system. Because many hygienic considerations for cultivated and conventional foods overlap, the guidance stemming from this new work should avoid unnecessarily distinguishing cultivated meat from other food categories or unduly burdening this industry with specific rules where general rules would apply. As the proposal notes, cultivated food production utilizes certain materials, equipment, and processes not found in conventional animal agriculture. While these differences eliminate certain hygienic hazards inherent in conventional animal agriculture, they also raise distinct considerations that Codex guidance is well-positioned to address.

We note that because the new work proposal is highly comprehensive, not every hygienic consideration it outlines will apply to all cultivated meat companies. For instance, Sections 3.1 and 4.1.1 of the draft Code address clean-room requirements, even though some products - such as Wildtype's salmon, which is commercially available in the United States - are produced without clean room facilities. It will therefore be important for the Code of Hygienic Practice to state clearly that its provisions are intended to be flexible, so as to avoid implying that every consideration applies uniformly across all producers.

Finally, regarding the aspects of the new work proposal related to labeling, we recommend that, should the new work address labeling at all, the proposal require "clear identification of the product," rather than "clear identification as cell-based food." Several jurisdictions with existing regulatory systems have already mandated labels that do not include the phrase "cell-based," but instead use other terms such as "cell-cultivated."

In summary, GFI encourages CCFH to pursue the new work on a code of hygienic practice for manufacturing cell-based foods to strengthen global alignment, while allowing for continued responsible innovation. By ensuring the new work allows for flexibility as technologies evolve, and draws on the substantial expertise of Member countries with existing regulatory systems, Codex can provide practical, forward-looking recommendations that uphold food safety without creating unnecessary barriers for this emerging sector. GFI stands ready to contribute to this process and welcomes the opportunity to support Codex in developing a code of hygienic practice that is science-based and globally relevant.

For stakeholders interested in learning more about the current state of the cultivated food industry, we respectfully offer the Good Food Institute's most recent State of the Industry Report⁴ as a resource for details about the commercial and regulatory landscapes for cultivated foods.

⁴ See <https://gfi.org/resource/cultivated-meat-seafood-and-ingredients-state-of-the-industry/>.