

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 9

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(Submitted by The Good Food Institute)

The Good Food Institute (GFI) appreciates the continuing interest of CAC Members and Observers in New Food Sources and Production Systems (NFPS) and how Codex can address issues related to NFPS in a timely and efficient manner, consistent with Goal 1 of the current Strategic Plan of the CAC. GFI values the thoughtful comments of Members and Observers in response to CL 2023/31/OCS-CAC, the analysis provided by the Codex Secretariat, and the report prepared by FAO on its recent foresight work relating to food safety aspects of some NFPS.

Within the category of NFPS, GFI and its global affiliates work to advance the safety, accessibility, affordability, and taste of alternative proteins such as plant-based and cultivated or cell-based meats and fermentation-derived ingredients through scientific research and corporate and policy initiatives.

As Members consider advancing concrete work proposals relevant to NFPS and the appropriate mechanisms for advancing such work, GFI respectfully submits the following considerations for the thoughtful review of esteemed delegates:

- **Emphasis on Scientific Foundation and Codex Risk Analysis Principles:** It is imperative to establish a robust scientific foundation and adhere to Codex risk analysis principles in the development or modification of standards, guidelines, and codes of practice that pertain to new foods.
- **Caution Against Overly Rigid Standards:** Acknowledging the dynamic nature of emerging foods, we urge caution against the imposition of overly rigid or premature standards. Flexibility in standard-setting is paramount to fostering innovation, accommodating diverse production technologies, and addressing variations within categories of new foods.
- **Equal Treatment of New Foods:** To ensure consistent treatment and avoid a distortion of fair practice in trade, it is essential to refrain from subjecting new foods to unnecessary regulatory burdens that are not applied to other food categories.
- **Maintenance of Timely and Accurate Information:** Maintaining up-to-date and accurate information about rapid developments in NFPS will enable informed decision-making within the Codex framework.

To facilitate a holistic and consistent approach to the possible development or revision of standards or guidelines applicable to NFPS, GFI respectfully urges the Commission to consider the following proactive measures, in alignment with Goals 1 and 5 of the current Strategic Plan of the CAC:

- **An Annual Circular Letter Process:** Continued efforts to gather up-to-date information on NFPS through an annual circular letter process would aid the CAC as a whole in identifying areas of potential new work, understanding how Members have addressed relevant issues at the national and/or regional levels, and assessing the sufficiency of existing Codex mechanisms for addressing NFPS.

- Standing Agenda Item for Emerging Issues: Including a standing item in the agenda for the annual CAC meeting dedicated to emerging issues would provide a structured platform for assessing the significance and relevance of issues relating to NFPS and whether they can be adequately addressed within existing Codex structures. In addition, the CAC could consider encouraging relevant subsidiary committees to adopt standing agenda items for emerging issues aligned with their Terms of Reference, as CCCF did at its most recent meeting.

GFI stands ready to provide technical assistance to Members developing work proposals or discussion papers on NFPS topics within GFI's scientific expertise.