

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items x

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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Submitted by the International Union of Food Science and Technology (IUFoST)

The objective of this Conference Room Document (CRD) is to provide comments on behalf of the International Union of Food Science and Technology (IUFoST), an observer organization of the Codex Alimentarius Commission, on some agenda items tabled at the 49th Session of the Codex Alimentarius Commission (CAC49).

The International Union of Food Science and Technology (IUFoST) represents the largest gathering of food science and technology scientists from around the world, consisting of over 300,000 scientists from more than 100 countries.

Agenda Item 2: Report of the 90th Session of the Executive Committee (CCEXEC90)

The International Union of Food Science and Technology (IUFoST) notes the report of the World Health Organization concerning its ongoing work related to foods commonly referred to as “ultra-processed foods” (UPFs), including the development of technical products addressing nutrient profiling models for regulatory purposes using ingredient-based UPF marker criteria.

IUFoST recalls that it has previously expressed concern, together with other members of the international food science and technology community, regarding the reliance of the current work on the “NOVA” food classification system, a model whose scientific basis and suitability for regulatory purposes remain the subject of significant scientific debate. IUFoST further notes with concern that, based on publicly available information, the composition of the expert groups undertaking this work appears to provide only limited representation of the

broader food science and technology community and of expertise related to food processing, food formulation, food technology, food chemistry and food engineering.

IUFoST is concerned that regulatory profiling approaches founded on terminology centered on “ultra-processing” may inadvertently stigmatize food processing itself, despite its essential contribution to food safety, food preservation, nutritional quality - as an enabler to food fortification-, affordability, food security and sustainability. Such approaches may also lead to unjustified negative perceptions regarding the use of food additives that are authorized under Codex standards following rigorous evaluations of technological justification and safety.

The Organization further notes that regulatory measures relying on UPF-based concepts are already emerging in some jurisdictions and may create unnecessary barriers to international trade, particularly where they are not supported by internationally agreed scientific principles or contrary to existing Codex guidance.

IUFoST also expresses concern regarding the publication of technical reports that promote front-of-pack **warning** labelling incorporating explicit references to “ultra-processed” foods, including the recent Pan American Health Organization publication on the “design of effective front-of-pack warning labels”. The inclusion of processing-based terminology within warning labels represents a significant departure from internationally recognized Codex guidance and risks encouraging national measures that are not aligned with Codex recommendations on Front of Pack Labelling.

Recognizing the important role of WHO in providing scientific advice to Member States, IUFoST considers that scientific assessments having potentially significant implications for Codex standards and international food trade should, wherever possible, be developed in response to **clearly formulated questions** arising from Codex itself. Such an approach would ensure that the scope of the scientific advice appropriately reflects Codex needs and facilitates its effective use within the Codex standard-setting process.

Finally, IUFoST encourages that the processes for the selection and composition of expert groups undertaking work with potential implications for Codex standards reflect principles similar to those applied by the Codex scientific advisory bodies, including transparency, balanced geographical representation, multidisciplinary expertise, and the inclusion of all relevant scientific disciplines necessary to ensure robust, objective and internationally credible scientific advice.

Agenda Item 5: Proposal for New Work – New work proposal on New Food Sources and Production Systems (NFPS)

IUFoST strongly supports the continued efforts of the Codex Alimentarius Commission to facilitate innovation in food production and to enable the safe development of new food

sources and production systems capable of contributing to food system resilience, climate adaptation and global food security.

IUFoST recognizes the merits of the proposal submitted by the European Union in drawing attention to emerging regulatory challenges. However, IUFoST considers that the current scope remains too broad to provide a practical basis for consensus work within Codex.

IUFoST therefore welcomes the conclusions of the Executive Committee and its recommendation to establish an electronic working group to further refine the proposal. IUFoST considers that such work would be most effective if directed towards the development of practical guidance for governments on considerations supporting the conception of regulatory requirements that can enable novel ingredients and processes ; or towards the development of technology-specific Codex guidance based on the application of the current risk analysis principles to particular categories of new food sources or production systems.

At the same time, IUFoST considers that the existing Codex risk analysis principles continue to provide a robust and scientifically sound framework for the assessment of foods, irrespective of whether they originate from traditional production systems or from emerging technologies. Any future guidance should therefore build upon these established principles rather than seek to replace them.

IUFoST reiterates its commitment to supporting Codex in fostering innovation while ensuring that regulatory approaches remain science-based, proportionate, and capable of maintaining consumer confidence as well as facilitating fair practices in international food trade.