CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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ADVANCING SCIENCE-BASED FOOD CLASSIFICATION: THE CASE FOR CODEX LEADERSHIP IN ADDRESSING THE "ULTRA-PROCESSED" DISCOURSE

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

1. Background and Context

In recent years, the growing discourse on so-called "ultra-processed foods" (UPFs) has significantly shaped public debate, influencing dietary guidelines, consumer behaviour, and policy discussions in several countries. Despite the strong public interest, the concept remains ill-defined and not anchored in a standardized scientific framework. The term "ultra-processed" has been used inconsistently across studies and policy documents, often conflating formulation and processing, and resulting in divergent interpretations. At the 44th Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU44), delegations noted the absence of a global definition and cautioned that reliance on processing level as a classification parameter could misclassify safe, nutritious foods and discourage beneficial technologies. While acknowledging the World Health Organization's (WHO's) planned expert consultation on diet quality and UPFs, members emphasized that Codex currently lacks a coordinated, evidence-based framework for food classification, which is essential for coherent international policy-making.

2. The Current Challenge: Lack of Methodological and Conceptual Clarity

Food classification systems that use processing level as the defining criterion—such as those underpinning the NOVA framework—raise significant methodological and policy challenges. The conflation of 'processing' (technological transformation) with 'formulation' (nutrient composition) leads to ambiguity, making it difficult to interpret, reproduce, or apply consistently in regulatory or public health contexts. Different actors—including governments, academia, and civil society—use the term 'ultra-processed' differently, leading to confusion and policy inconsistency. Given the cross-sectoral nature of food classification, which affects nutrition, agriculture, and trade, such lack of clarity undermines coherence and risks creating unscientific policy outcomes.

3. Policy Implications Across Sectors

Classification systems that are not scientifically grounded can have unintended and far-reaching implications. They may discourage the use of essential food technologies—such as pasteurization, fortification, and reformulation for nutrient delivery—that support public health objectives. They may also lead to incoherent policy signals, misinform consumers, and create barriers to trade if countries adopt inconsistent criteria. Globally, such classifications could negatively affect market access, consumer perception, and competitiveness across diverse food systems. Given the interconnectedness of health, agriculture, and trade policies, Codex leadership is essential to ensure that food classification systems remain evidence-based, fair, and harmonized at the international level.

4. Why Codex Is the Legitimate and Optimal Forum

The Codex Alimentarius Commission provides the only intergovernmental platform where the policy interests of health, agriculture and trade converge. It ensures balanced, inclusive and science-driven deliberations, and its decisions carry global legitimacy through joint FAO and WHO endorsement. Codex already addresses aspects of food classification implicitly through instruments such as the Guidelines on Nutrition Labelling (CAC/GL 2-1985) and Front-of-Pack Nutrition Labelling (CAC/GL 2-1985, Rev. 2020), which link compositional criteria to health outcomes. These tools could serve as the scientific foundation for any future work on food classification. In line with its Strategic Plan 2026-31—where Codex commits to being proactive, responsive to emerging issues and capable of prioritizing standards development in an evolving global environment—Codex is uniquely positioned to lead a structured discussion on food classification. By doing so, Member States can

prevent fragmented or unilateral classification systems, thereby avoiding confusion, trade disruption and erosion of public confidence.

5. Leveraging Ongoing Discussions and Mechanisms

Codex deliberations have already acknowledged the need for a coherent, science-based approach to food classification. At CCNFSDU44, members agreed to continue observing global developments related to the terminology of “ultra-processed foods”. While important analytical work is also being pursued by Codex’s parent organizations—such as WHO’s planned expert consultation on ultra-processed foods— these initiatives, if conducted outside a Codex mandate, risk leading to uncoordinated or divergent outcomes. Such parallel processes could result in discrepancies in definitions, methodologies, and policy interpretations, potentially adding confusion for Member States and stakeholders. Ensuring that these efforts are anchored within a Codex-mandated process would therefore help maintain consistency, transparency, and alignment with the Codex principles of harmonization and sound science.

6. The Way Forward – Seeking CAC48 Guidance on a Structured Codex Dialogue on Food Classification Systems and their Implications

To ensure coherence and scientific integrity, the Codex Alimentarius Commission is invited to provide guidance on how best to initiate and structure a comprehensive discussion on food classification within the Codex framework. This matter would benefit from the coordinated engagement of relevant subsidiary bodies, supported by the scientific expertise of FAO and WHO.

The process should enable a systematic review of existing classification approaches, identification of conceptual and methodological gaps, and consideration of options for developing an integrated, evidence-based framework that reflects the multidimensional nature of food systems—encompassing formulation, processing, and function. Such an approach would allow foods to be assessed through transparent and measurable criteria, linking composition, technological processes, and intended use to their contribution to nutrition, safety, and sustainability. The Codex Committee on Food Labelling (CCFL) could serve as one possible venue for initiating this discussion, given its cross-cutting mandate on food characterization and consumer information.

By seeking the Commission’s explicit direction on the most appropriate mechanism, the food science and technology community, represented by IUFoST, respectfully calls on Member Countries and observers to support Codex leadership in addressing food classification as a priority emerging issue. Doing so would reinforce trust in international standards, enhance coordination across sectors, and ensure equitable participation of all Members in shaping evidence-informed global food policies.

7. Conclusion

The growing debate around “ultra-processed foods” underscores the urgent need for a globally coherent, scientifically sound, and transparent approach to food classification. Given its unique mandate at the intersection of health, agriculture, and trade, the Codex Alimentarius Commission is best positioned to lead this discussion and ensure that future work on food classification is grounded in evidence and aligned with Codex principles. Fragmented initiatives outside a Codex framework risk producing inconsistent definitions and policy interpretations, creating confusion for governments, industry, and consumers alike.

Accordingly, the Commission is invited to provide guidance on how Codex should address this issue within its structure, ensuring that any future consideration of food classification benefits from the collective expertise of Codex subsidiary bodies and the scientific input of FAO and WHO. Establishing such a coordinated and science-driven process would strengthen global policy coherence, reinforce confidence in international food standards, and ensure that Member States are equally equipped to participate in the development of evidence-based, fair, and transparent food classification approaches.