



JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEx COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Forty-fourth Session

Dresden, Germany

(Comments by EUVEPRO, ENSA and IMACE)

AGENDA ITEM 6.2 PROPOSALS FOR NEW WORK/EMERGING ISSUES

(REPLIES TO CL 2024/52-NFSDU)

EUVEPRO (European Vegetable Protein Association), ENSA (European Plant-Based Foods Association), and IMACE (European Margarine Association) acknowledge the increased inclusion of plant-based foods and beverages in balanced diets comprising all key nutrients, as encouraged by dietary guidance recommendations around the world, and support high quality and safety standards for these products.

However, we believe that developing General guidelines and principles for the nutritional composition of foods formulated with protein from non-animal sources (proposal 2.2 from Canada and the United States, [CX/NFSDU 24/44/6](#)) is premature, does not bring added value, and may be problematic for several reasons.

- **Lack of guidelines on the nutritional composition of animal-based foods**

The proposal aims to establish nutritional composition criteria for foods formulated with protein from non-animal sources based on “nutritional equivalence” to their animal-derived counterparts. However, before these criteria can be developed, it is crucial to first define the **nutritional properties and composition of the corresponding animal-based foods** in a standardized manner. Without clear benchmarks for comparison, it is impossible to assess nutritional equivalence in a consistent and transparent way.

A thorough review of existing Codex Alimentarius commodity standards is needed to identify gaps, and new standards must be created where necessary before guidelines for foods composed of plant-based and alternative proteins can be developed. For example, the Codex standard for Fermented Milks (CXS 243) does not specify sugar composition, and the Codex standard for Cheddar (CXS 263) lacks criteria for protein content.

Additionally, achieving true nutritional equivalence between plant-based and animal-based foods must consider not only positive nutrients but also **nutrients of concern**, such as trans fats. However, this can be challenging, as plant-based foods are often held to stricter regulations. For instance, many jurisdictions cap trans fat content from non-animal sources at 2g per 100g fat, in line with the WHO’s REPLACE Trans Fat Programme. Yet, animal-derived foods like dairy butter and certain meats naturally contain higher levels of trans fats, up to 9%, which are exempt from these limits. As a result, plant-based foods would be unable to meet nutritional equivalence standards without exceeding legal trans fat limits.

Unfortunately, these critical issues are not addressed in the new work proposal, which overlooks the full scope of work needed to achieve the intended goal. Even limiting the work to protein content and quality would still require significant revisions to existing standards.

- **Duplication of ongoing and future guidelines**

The World Health Organization (WHO) has initiated the process of developing [global guidelines on both animal-source foods and plant-based alternatives](#). These guidelines, expected to be finalized in 2027, will complement existing WHO guidance on macronutrient intake and are intended to provide scientific advice to the Codex Alimentarius through joint FAO and WHO programs like the Joint Expert Committee on Food Additives (JECFA) and the Joint Expert Meetings on Microbiological Risk Assessment. The guidelines will consider evidence related to both the benefits and harms of these foods as well as other factors such as microbiological and chemical contaminants, supported by risk-benefit assessments.

In addition, the [ISO plant-based foods working group](#) is currently developing a definition for plant-based foods and criteria for plant-based foods labelling and claims which will only be finalised in 2025. Until ISO’s work is published, the lack of a universally accepted definition of these products can possibly mislead consumers and manufacturers, and makes it impossible to accurately define the scope of the proposal.

Given the scope of this proposed work, it is advisable to wait for the outcome of these efforts before developing additional guidelines on the same subject. The new work proposal also refers to a recently completed literature review by FAO, that compares the nutritional composition of foods made from plant-based and other alternative

protein sources, which are intended to replace animal-based products. However, the findings have not been published yet.

- **Challenges of nutritional composition in mixed products**

New types of hybrid food products are emerging, challenging the application of the principle of nutritional equivalence. For example, Lidl has launched a new product for the Dutch market that combines 60 percent minced beef with 40 percent pea protein, offering a partly plant-based minced meat option. Similarly, Quorn is planning to launch meat-blended products by the end of 2024. This trend is likely to expand across various food categories, where part of the animal protein will be replaced by plant-based or alternative proteins for reasons of cost and sustainability. These products do not fall neatly into the category of plant-based foods, as they still contain significant amounts of animal protein. At the same time, they are neither purely meat nor dairy. Similarly, Japan has established standards for textured soy protein products (JAS0019), which are plant-based but not intended to serve as meat substitutes. How would such hybrid or specialized products be addressed if the work moves forward?

- **Labelling and transparency issues**

Under the GSUDT's current interpretation, plant-based products cannot be marketed as "real" alternatives to cream, meaning they cannot be presented as substitutes for dairy products. This conflicts with the argument that non-dairy items must meet nutritional standards to resemble animal-based foods. If nutritional equivalence is required, plant-based products should be allowed to be marketed as equivalent to their animal-based counterparts, necessitating a revision of the GSUDT to permit such terms. Without this clarity, there is little reason to require nutritional equivalence if consumers aren't informed that these products are alternatives to meat or dairy.

Additionally, countries like the Czech Republic, Finland, South Africa, and Turkey have introduced laws restricting terms like "alternative" when labelling plant-based foods. If plant-based alternatives cannot be labelled as substitutes for animal-based products, there is no justification for requiring nutritional equivalence, regardless of the standards eventually set.

Even if labelling requirements were removed from the guidelines, challenges would remain, leading to regulatory fragmentation. Without clear labeling rules, even nutritionally equivalent plant-based products could not be properly marketed as alternatives, causing consumer confusion and inconsistencies in global markets.

Therefore, EUVEPRO, ENSA, and IMACE recommend the proposal on the General guidelines and principles for the nutritional composition of foods formulated with protein from non-animal sources be rescinded among the new Codex work proposals, on the basis of the prioritisation mechanism implemented to better manage the work of CCNFSDU ([CL 2024/52-NFSDU](#)):

- 1. Impact on public health**

The proposal notes that most plant-based foods have lower protein content than their animal counterparts. Contrarily, the World Resources Institute Working Paper "[Shifting Diets for a Sustainable Food Future](#)" shows that total protein intakes in all markets surveyed exceed recommended intakes. This trend is especially visible in developed countries, with protein intakes almost doubling the required needs in the USA, Canada, and Europe. Moreover, the data shows that plant sources provide nearly all the necessary protein, suggesting that the risk of protein deficiency for those consuming a varied, plant-based diet in these regions is very low. Additionally, the estimated intended health impact of establishing these guidelines is to reduce the risk of inadequate or excessive intake of certain nutrients. Concerns raised about certain nutrients, such as sodium, saturated fats, and sugars are not unique to foods formulated with protein from non-animal sources. These issues should be addressed through broader nutritional guidance rather than specific standards based on nutritional equivalence to animal proteins. Therefore, the proposal's impact on public health is low.

- 2. Impact on food safety**

The scope of the proposed guidance is restricted to nutritional composition and does not address food safety aspects. As a result, the guidelines would fall short of contributing to one of the core objectives of the Codex Alimentarius, which is more effectively achieved through existing nutritional guidelines. The impact of the proposal on food safety is neutral.

- 3. Impact on trade practices**

Aiming for nutritional equivalence would mean that plant-based products and their animal-based equivalents can be considered "like products," with similar nutritional value and similar culinary uses. Failing to take into account nutrients of concern alongside positive nutrients would constitute a Technical Barrier to Trade, treating "like products" differently from one another. Given that plant-based foods cannot legally meet equivalence conditions for nutrients of concern, the proposal cannot proceed without imposing unfair conditions on plant-based products. Consequently, the proposal would have a low impact on trade.

4. Global impact

While establishing global guidance for the nutritional composition of plant-based foods could lead to more harmonised international regulations, such guidelines could limit the diversity and innovation of plant-based food products, especially those developed by small and medium enterprises (SMEs). Indeed, continued innovation is the best way to address any nutritional inadequacies in plant-based foods, and premature nutrient composition guidance may impede future advancements and breakthroughs in this area. Thus, while harmonization of international regulations is important, we must ensure that it does not come at the expense of diversity, innovation, and cultural considerations. The global impact of the proposal is low.

Key conclusions

- Standards of identity and composition do not exist for all animal-derived foods to which plant-based foods are intended to be compared to. Currently, there are substantial gaps for animal-derived counterparts of popular plant-based foods.
- The WHO and ISO are already working on guidelines and definitions for plant-based foods, with expected completion dates in 2027 and 2025, respectively. Developing new guidelines now may duplicate these ongoing efforts.
- For a significant portion of the Western population, consuming a varied and plant-based balanced diet, the likelihood of protein deficiencies remains very low. The nutritional guidelines will be in conflict with public health laws and contradict national dietary guidelines.
- Nutritional guidelines will constitute a hurdle for innovation and development of new and diverse plant-based foods that meet the varied needs and preferences of consumers.
- Unequal regulatory treatment of “like products” constitutes a Technical Barrier to Trade.
- The proposal scores low on the basis of CCNFSDU’s prioritization criteria and should not be taken up by the Committee.