



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

Forty-fourth Session

Dresden, Germany

(Comments by Institute of Food Technologists)

AGENDA ITEM 3 MATTERS OF INTEREST ARISING FROM FAO AND WHO

The Institute of Food Technologists (IFT) submits to CCNFSDU 44 for consideration these comments associated with the WHO communication on Ultra Processed Foods (UPF) during their presentation on matters of interest.

IFT appreciates the WHO plans to help better define UPF. Present categorizations for UPF are creating much confusion for all stakeholders, with widely varying interpretations. Many of these definitions, including NOVA, which is predominant in the literature, are subjective and ambiguous from a scientific research and implementation standpoint. The subjectivity of the definition has been demonstrated in a study using the PREDIMED-Plus cohort which reported different associations with BMI, blood pressure, and blood lipids based on the definition used for ultra-processed or highly processed foods[1]. This confusion is resulting in negative messaging towards many healthy and sustainable foods and compromising food options. We ask WHO how it proposes to better frame recommendations on healthy food guidance, rather than implying all UPF's are negative. This seems important while WHO works out a better categorization model for processed foods, to focus on meaningful science-based guidance.

As the WHO works on additional research and frameworks to provide greater clarity on the classification of foods as ultra-processed, we also suggest the following considerations for research:

- The concept of UPF overlaps with many of the nutrients and food components such as added sugars, sodium, and saturated fats. There is a greater body of evidence for these food components that enable greater confidence in recommendations. Future research should better tease apart the role of specific nutrients and food components within UPF in relation to health.
- Research that layers the nutritive value of foods and diet quality along with examination of UPF in the diet.
 - Due to the broad classification criteria utilized in many definitions, UPF can include foods with nutrients that need to be increased, such as whole grains, fiber, vitamins, and minerals in many enriched and fortified grain products or dairy products, as well as nutrients and components that need to be decreased, such as added sugar, sodium, and saturated fat.
 - As noted in recent research by Hess, et al.[2], an improvement in diet quality (as measured by the U.S. healthy eating index score) is possible, even when more than 80% of foods in the diet are considered UPF by the NOVA classification.
 - Further, a study in BMJ reported that diet quality was inversely associated with mortality regardless of the amount of UPF in the diet[3].
 - Another recent study in Lancet[4] reported an association of UPF with CVD, CHD and stroke, but the risk was dependent on the type of UPF. Sugar sweetened beverages and processed meats were linked to a higher risk for CVD and CHD, but other, more nutritionally diverse UPF, such as cereals, breads, yogurt/dairy were inversely related to disease risk. Similar associations between specific categories of UPF (sugar-sweetened beverages and processed meats) were also reported for risk of all-cause mortality.[5]

In conclusion, IFT encourages WHO to seek global input focused on meaningful, science-based guidance for the global community of stakeholders and encourages a thorough review of recent global scientific literature regarding UPF.

- [1] Martinez-Perez C, San-Cristobel R, Guallar-Castillon P, et al.(2021) Use of different food classification systems to assess the association between ultra-processed food consumption and cardiometabolic health in an elderly population with metabolic syndrome (PREDIMED-Plus Cohort). *Nutrients* 13, 2471–2
- [2] Hess, Julie M., et al. (2023) "Dietary guidelines meet NOVA: developing a menu for a healthy dietary pattern using ultra-processed foods." *The Journal of Nutrition* 153.8, 2472-2481.
- [3] Fang, Zhe, et al. (2024) "Association of ultra-processed food consumption with all cause and cause specific mortality: population based cohort study." *BMJ* 385.
- [4] Mendoza, Kenny, et al. "Ultra-processed foods and cardiovascular disease: analysis of three large US prospective cohorts and a systematic review and meta-analysis of prospective cohort studies." (2024) *The Lancet Regional Health–Americas* 37.
- [5] Osté, Maryse CJ, et al. (2022) "Ultra-processed foods and risk of all-cause mortality in renal transplant recipients." *The American Journal of Clinical Nutrition* 115.6, 1646-1657.