

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 7.1

NFSDU/43 CRD37

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

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Comments by the World Health Organization

AGENDA 7: PRIORITIZATION MECHANISM / EMERGING ISSUES OR NEW WORK PROPOSAL

English

Prioritization mechanism / emerging issues or new work proposals: new work proposals

Proposal 2.3: General Guidelines to establish nutrient profiles for front-of-pack nutrition labelling (FOPNL)

As part of its normative mandate, WHO has been working on establishing nutrient profile models (NPMs) for over a decade¹. WHO initially focused on providing overall evidence-based guiding principles for the development and implementation of NPMs, which led to the development of region-specific models in all six WHO regions to support governments in implementing policies to protect children from the harmful impact of marketing of foods and non-alcoholic beverages.^{2,3,4,5,6,7}

Such guidance has evolved. For example, the NPM for the WHO European Region published in 2015 has just been updated.⁸ The guidance has also expanded to cover other policies targeting the food environment. For example, the NPM developed for the region of the Americas in 2016 was designed for multiple applications, including front-of-package labelling, regulation for school environments, fiscal policies on foods and non-alcoholic beverages, among other policies.⁴ Models developed in WHO South-East Asia (SEARO)⁵ and Africa (AFRO)⁷ included definitions for food and non-alcoholic beverages excessive in total fats, saturated fats, free sugars and sodium that have the potential to be used in other policies requiring such definition.

The adoption of WHO regional NPMs by countries have strengthened their policies to promote and protect healthy diets and public health, and have reduced the time they take to deliver such benefits to their populations.⁹ Following Member States' requests, WHO continued to work on NPMs, including for applications other than marketing

¹ WHO. Nutrient profiling: Report of a WHO/IASO technical meeting. (2010): https://apps.who.int/nutrition/publications/profiling/WHO_IASO_report2010/en/index.html

² WHO/EURO Nutrient profiling model (2015): https://www.euro.who.int/_data/assets/pdf_file/0005/270716/Nutrient-children_web-new.pdf

³ WHO/WPRO Nutrient profiling model (2016): <https://www.who.int/publications/i/item/9789290617853>

⁴ WHO/PAHO Nutrient profiling model (2016): https://iris.paho.org/bitstream/handle/10665.2/18621/9789275118733_eng.pdf

⁵ WHO/SEARO Nutrient profiling model (2017): <https://apps.who.int/iris/handle/10665/253459>

⁶ WHO/EMRO Nutrient profiling model (2017): https://applications.emro.who.int/dsaf/EMROPUB_2017_en_19632.pdf

⁷ WHO/AFRO Nutrient profiling model (2019): <https://apps.who.int/iris/handle/10665/329956>

⁸ WHO/EURO Nutrient profiling model. 2nd edition (2023): <https://www.who.int/europe/publications/i/item/WHO-EURO-2023-6894-46660-68492>

⁹ Crosbie E, et al. A policy study on front-of-pack nutrition labeling in the Americas: emerging developments and outcomes. *Lancet Reg Health Am.* 2022;18:100400. doi: 10.1016/j.lana.2022.100400.

restrictions.^{10,11} This will also complement forthcoming WHO guidelines on nutrition labelling policies,¹² fiscal policies to promote healthy diets,¹³ and policies to protect children from the harmful impact of food marketing,¹⁴ and is of particular importance for those regions that initially focused their NPMs on policies to restrict the marketing of food and non-alcoholic beverages.

Work is underway to develop guidance for establishing NPMs for front-of-package labelling in regions where WHO regional NPMs initially focused only on marketing regulations. WHO will continue to provide guidance and technical support to its Member States on advancing implementation of food environment policies to promote healthy diets, including guidance on NPMs that underlie such policies.

For these reasons, we believe the newly proposed CCFSDU work described in proposal 2.3 (under agenda item 7.1) is not needed given WHO's past and ongoing work in this area.

Spanish:

Mecanismo de asignación de prioridades, cuestiones emergentes o propuestas de nuevos trabajos: propuestas de nuevos trabajos

Propuesta 2.3: Directrices generales para el establecimiento de perfiles de nutrientes para el etiquetado nutricional en la parte frontal del envase (ENPFE)

Como parte de su mandato normativo, la OMS ha estado trabajando en el establecimiento de modelos de perfiles de nutrientes (MPN) durante más de una década.¹⁵ Inicialmente, la OMS se centró en proporcionar principios rectores generales basados en la evidencia para el desarrollo y la implementación de MPN, lo que condujo al desarrollo de modelos específicos para cada región en las seis regiones de la OMS para apoyar a los gobiernos en la implementación de políticas para proteger a las niñas y a los niños del impacto nocivo de la promoción y publicidad de alimentos y bebidas no alcohólicas.^{16,17,18,19,20,21}

Dicha orientación ha evolucionado. Por ejemplo, el MPN para la Región Europea de la OMS publicado en 2015 se acaba de actualizar.²² La asesoría también se ha ampliado para cubrir otras políticas dirigidas al entorno alimentario. Por ejemplo, el MPN desarrollado para la región de las Américas en 2016 fue diseñado para múltiples aplicaciones, incluido el etiquetado en el frente del envase, regulación para entornos escolares, políticas fiscales sobre alimentos y bebidas no alcohólicas, entre otras políticas.⁴ Modelos desarrollados por la OMS en el Sudeste

¹⁰ Use of nutrient profile models for nutrition and health policies: meeting report on the use of nutrient profile models in the WHO European Region, September 2021. (2022): <https://www.who.int/europe/publications/i/item/WHO-EURO-2022-6201-45966-66383>

¹¹ The Global RECAP: Global Regulatory and Fiscal Capacity Building Programme (2023): <https://www.who.int/initiatives/global-regulatory-and-fiscal-policy-capacity-buidling-programme>

¹² Sixth meeting of the WHO Nutrition Guidance Expert Advisory Group (NUGAG) Subgroup on Policy Actions (2022): [https://www.who.int/news-room/events/detail/2022/12/14/default-calendar/sixth-meeting-of-the-who-nutrition-guidance-expert-advisory-group-\(nugag\)-subgroup-on-policy-actions](https://www.who.int/news-room/events/detail/2022/12/14/default-calendar/sixth-meeting-of-the-who-nutrition-guidance-expert-advisory-group-(nugag)-subgroup-on-policy-actions)

¹³ Public consultation on the draft WHO guideline on fiscal policies to promote healthy diets (2022): <https://www.who.int/news-room/articles-detail/public-consultation-on-the-draft-guideline-fiscal-policies-to-promote-healthy-diets>

¹⁴ Public consultation on the draft WHO guideline on policies to protect children from the harmful impact of food marketing (2022): <https://www.who.int/news-room/articles-detail/Online-public-consultation-on-draft-guideline-on-policies-to-protect-children-from-the-harmful-impact-of-food-marketing>

¹⁵ WHO. Nutrient profiling: Report of a WHO/IASO technical meeting. (2010): https://apps.who.int/nutrition/publications/profiling/WHO_IASO_report2010/en/index.html

¹⁶ WHO/EURO Nutrient profiling model (2015): https://www.euro.who.int/_data/assets/pdf_file/0005/270716/Nutrient-children_web-new.pdf

¹⁷ WHO/WPRO Nutrient profiling model (2016): <https://www.who.int/publications/i/item/9789290617853>

¹⁸ WHO/PAHO Nutrient profiling model (2016): https://iris.paho.org/bitstream/handle/10665.2/18621/9789275118733_eng.pdf

¹⁹ WHO/SEARO Nutrient profiling model (2017): <https://apps.who.int/iris/handle/10665/253459>

²⁰ WHO/EMRO Nutrient profiling model (2017): https://applications.emro.who.int/dsaf/EMROPUB_2017_en_19632.pdf

²¹ WHO/AFRO Nutrient profiling model (2019): <https://apps.who.int/iris/handle/10665/329956>

²² WHO/EURO Nutrient profiling model. 2nd edition (2023): <https://www.who.int/europe/publications/i/item/WHO-EURO-2023-6894-46660-68492>

Asiático (SEARO)⁵ y África (AFRO)⁷ incluyeron definiciones para alimentos y bebidas no alcohólicas con exceso de grasas totales, grasas saturadas, azúcares libres y sodio que tienen el potencial de ser utilizadas en otras políticas que requieren dichas definiciones.

La adopción de los MPN regionales de la OMS por parte de los países ha fortalecido sus políticas para promover y proteger las dietas saludables y la salud pública, y ha reducido el tiempo que tardan en brindar tales beneficios a sus poblaciones.²³ A raíz de las solicitudes de los Estados Miembros, la OMS siguió trabajando en los MPN, incluso para aplicaciones distintas de las restricciones de promoción y publicidad.^{24,25} Esto también complementará las próximas directrices de la OMS sobre políticas de etiquetado nutricional,²⁶ políticas fiscales para promover dietas saludables²⁷, y políticas para proteger a las niñas y a los niños del impacto nocivo de la promoción y publicidad de alimentos,²⁸ y es de particular importancia para aquellas regiones que inicialmente centraron sus MPN en políticas para restringir la promoción y publicidad de alimentos y bebidas no alcohólicas.

Se está trabajando para desarrollar una guía para establecer MPN para el etiquetado en el frente del envase en regiones donde los MPN regionales de la OMS inicialmente se centraron solo en las regulaciones de promoción y publicidad. La OMS seguirá brindando orientación y apoyo técnico a sus Estados Miembros sobre el avance de la implementación de políticas sobre los ambientes alimentarios para promover dietas saludables, incluida la orientación sobre los MPN que subyacen a dichas políticas.

Por estas razones, creemos que el trabajo del CCNFSDU recién propuesto descrito en la propuesta 2.3 (bajo el punto 7.1 de la agenda) no es necesario dado el trabajo pasado y en curso de la OMS en esta área.

²³ Crosbie E, et al. A policy study on front-of-pack nutrition labeling in the Americas: emerging developments and outcomes. *Lancet Reg Health Am.* 2022;18:100400. doi: 10.1016/j.lana.2022.100400.

²⁴ Use of nutrient profile models for nutrition and health policies: meeting report on the use of nutrient profile models in the WHO European Region, September 2021. (2022): <https://www.who.int/europe/publications/i/item/WHO-EURO-2022-6201-45966-66383>

²⁵ The Global RECAP: Global Regulatory and Fiscal Capacity Building Programme (2023): <https://www.who.int/initiatives/global-regulatory-and-fiscal-policy-capacity-buidling-programme>

²⁶ Sixth meeting of the WHO Nutrition Guidance Expert Advisory Group (NUGAG) Subgroup on Policy Actions (2022): [https://www.who.int/news-room/events/detail/2022/12/14/default-calendar/sixth-meeting-of-the-who-nutrition-guidance-expert-advisory-group-\(nugag\)-subgroup-on-policy-actions](https://www.who.int/news-room/events/detail/2022/12/14/default-calendar/sixth-meeting-of-the-who-nutrition-guidance-expert-advisory-group-(nugag)-subgroup-on-policy-actions)

²⁷ Public consultation on the draft WHO guideline on fiscal policies to promote healthy diets (2022): <https://www.who.int/news-room/articles-detail/public-consultation-on-the-draft-guideline-fiscal-policies-to-promote-healthy-diets>

²⁸ Public consultation on the draft WHO guideline on policies to protect children from the harmful impact of food marketing (2022): <https://www.who.int/news-room/articles-detail/Online-public-consultation-on-draft-guideline-on-policies-to-protect-children-from-the-harmful-impact-of-food-marketing>