

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 7

NFSDU/43 CRD 33

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

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PRIORITIZATION MECHANISM / EMERGING ISSUES OR NEW WORK PROPOSAL

Comments by The Good Food Institute

AGENDA ITEM 7: PRIORITIZATION MECHANISM / EMERGING ISSUES OR NEW WORK PROPOSALS

The Good Food Institute¹ (GFI) welcomes the increased inclusion of plant-based and other alternative proteins in balanced diets around the world and is encouraged by the Codex Alimentarius Commission (CAC) members' recent interest in these and other "new food sources and production systems" (NFPS), as highlighted in the last Commission meeting.² Considering how best to address NFPS at the Codex level to ensure fair practices in trade and consumer health, including in regulatory areas falling within the terms of reference of the CCNFSDU, is of critical importance.

However, the United States' and Canada's proposal that the CCNFSDU consider developing guidelines including general principles for the nutritional composition of foods and beverages made from plant-based and other alternative protein sources (CX/NFSDU 23/43/7), raises several issues which may need to be addressed under agenda item 7(a) within the context of a broader strategic discussion before any work on such guidance may be undertaken. Therefore, GFI recommends that CCNFSDU refrain from supporting the proposal at this point in time.

Rationale:

The proposal to develop guidelines for the nutritional composition of foods and beverages made from plant-based and other alternative protein sources raises several concerns. Determining the scope of food and beverage products to which the proposed guidance would apply is problematic. The proposed focus on plant-based and other alternative proteins alone is troublesome, as discussed further below. In addition, the proposed scope parameter of plant-based or other alternative proteins that are "intended to replace" an animal product is unclear. Plant-based and other alternative proteins are consumed for many reasons and most often as part of a mixed diet with a variety of sources of macro- and micro-nutrients. These products may be functional substitutes for foods and beverages of animal origin without being intended to, or understood or desired by consumers as, replicating the nutritional intake from the animal-based products. On the contrary, differences in food and beverage product composition enable greater consumer choice, not only for those who do not consume animal products but also for those who have flexible diets that include both animal-based and plant-based foods and beverages.³ The growing

¹ The Good Food Institute (GFI) is a nonprofit civil society organization developing the roadmap for a sustainable, secure, and just protein supply. We identify the most effective solutions, mobilize resources and talent, and empower partners across the food system to make plant-based and cultivated meat accessible, affordable, and delicious. We are headquartered in the United States and have affiliates in Brazil, Europe, Israel, and Asia. Lead Regulatory Counsel, Laura Braden, may be contacted at laurab@gfi.org.

² See [CAC45 Report](#), para. 23-31.

³ Studies have shown that the vast majority of consumers of plant-based meat and dairy alternatives are neither vegetarian nor vegan. See, e.g., NPD Group 2019 [study](#).

market of plant-based and alternative proteins is not made up of foods and beverages claiming to serve a special dietary use. Instead, the focus is on using ingredients of non-animal origin.

Moreover, using animal-based proteins as references for a nutritional composition guideline raises multiple issues, including the lack of global standards for many of the products that would need to serve as such references and the fact that many foods containing animal proteins could also include nutrients of concern such as dietary cholesterol or saturated fat that plant-based or other alternative proteins may lack or include at lower levels.

As with any other food, the nutritional composition of plant-based and other alternative protein-based foods and beverages must be considered within the context of an overall diet. To the extent that the CCNFSDU terms of reference are concerned with the impact on human health of certain nutrients found in foods in general, including in some plant-based and other alternative protein-based foods, these nutrients of concern are not unique to this category of products, and such concerns have previously been addressed by the Committee by developing NRV-NCDs. As such, the proposed approach of developing a nutritional composition guideline that exclusively applies to one category of products would not be the best way for CCNFSDU to address these concerns. As long as clear nutrient information is provided to consumers, consumers will be able to make appropriate decisions about what foods to consume within the context of their individual diets. The role of national and/or regional competent authorities in raising the awareness of their consumers about good and healthy eating habits to help them make better-informed choices based on national dietary guidelines is paramount. That cannot readily be addressed through any Codex Alimentarius guidelines.

As the proposal recognizes, there are many different alternative protein producers with different methods, feed crops, and visions for final products.⁴ Creating guidance based on nutritional equivalence with animal-based analogue foods or beverages could impede future advancements and breakthroughs to improve the products. Continued innovation is the best way to address any nutritional shortcomings, and that could be jeopardized by the proposed guidelines, leaving consumers with fewer choices and healthy products for purchase.

A nutrition composition guideline applying only to plant-based and other alternative protein-based foods or beverages would create a distortion of fair practice in trade as well as a disparity in perception between foods that would be presumed to be nutritionally sound and foods that are not, which is something CCNFSDU and the CAC as a whole have traditionally avoided. To avoid this, CCNFSDU would need to assess the longer-term consequences and consider the proposal as part of a broader strategic purview, i.e., to develop general guidelines about nutritional composition for all foods and beverages, which may require a broadened discussion by the CAC, including its Executive Committee, perhaps in the context of the future strategic goals to be set within the upcoming Strategic Plan for the Codex Alimentarius Commission for 2026-2030, with inputs of all Regional Coordinating Committees and other relevant Codex Committees.

⁴ Additional information on the global state of the industry for plant-based and fermentation-derived alternative proteins can be found in GFI's annual [State of the Industry Reports](#).