Preliminary Assessment of the WHO Integrated Nutrient and Food Profiling Model for Regulatory Purposes

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2 November 2026 | Preliminary commentary following the public consultation launch – during the 45th Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses.

Executive Summary

After a considerable period of anticipation, the World Health Organization (WHO) has introduced its proposed Integrated Nutrient and Food Profiling Model during the 45th Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU), on 2 November 2026, launching a public consultation on an approach intended to support regulatory interventions aimed at preventing obesity and diet-related non-communicable diseases (NCDs).

While addressing legitimate public health concerns, the proposed approach raises important questions regarding its scientific foundations and regulatory justification.

The principal concern is the apparent absence of **an explicit risk analysis framework**, consistent with internationally recognized principles of evidence-based food regulation, including scientific justification, proportionality, and regulatory impact assessment.

Beyond established nutrient criteria, the model introduces additional criteria based on the presence of colours, flavourings, and sweeteners, without clearly demonstrating how these ingredients independently contribute to adverse health outcomes. Furthermore, its validation relies substantially on correspondence with the NOVA classification of ultra-processed foods, rather than independent evidence linking the proposed classifications to health risks.

The intended application of the model to regulatory instruments, potentially including taxation, raises additional concerns regarding proportionality and demonstrated effectiveness. Addressing multifactorial challenges such as obesity and NCDs requires interventions supported **by evidence of measurable public health benefits,** rather than **product classification alone**.

This assessment remains preliminary, pending a detailed examination of the WHO consultation document and its supporting scientific evidence. **Ultimately, food profiling should inform regulatory decision-making, not substitute for risk analysis, scientific justification, and assessment of regulatory impacts.**

A New Regulatory Approach that Raises Fundamental Questions

After a considerable period of anticipation, WHO has presented its proposed integrated nutrient and food profiling model, intended to support countries in developing and implementing regulatory measures aimed at preventing obesity and diet-related non-communicable diseases (NCDs).

The initiative responds to legitimate and pressing public health concerns. The growing prevalence of obesity and diet-related NCDs, alongside persistent challenges of undernutrition and limited access to healthy diets, undoubtedly calls for more effective public health interventions.

However, the approach presented raises fundamental questions regarding the scientific foundations of the proposed model, its alignment with internationally recognized principles of food regulation, and the appropriateness of the regulatory instruments it seeks to support.

1. A Regulatory Model Developed Without Explicit Reference to Risk Analysis

Perhaps the most striking feature of the presentation was the absence of explicit reference to established principles of food risk analysis, which have underpinned international food regulatory frameworks for decades.

The principles advocated by the Codex Alimentarius Commission, together with the disciplines established under the WTO Agreement on the Application of Sanitary and Phytosanitary Measures and the OECD recommendations on regulatory policy and governance, emphasize the importance of scientific evidence, transparent decision-making, proportionality, and the assessment of regulatory impacts.

While not all nutrition-related regulatory interventions fall within the scope of the WTO SPS Agreement, these broader principles of evidence-based regulatory decision-making remain highly relevant.

The presentation did not clearly explain how the proposed model incorporates these principles or how its classifications would translate into regulatory decisions supported by an assessment of risks, anticipated benefits, and potential unintended consequences.

A food profiling model may be useful for identifying products that warrant further policy consideration. However, **classification alone does not establish** the scientific justification for **imposing regulatory restrictions.**

2. Moving Beyond Nutrient-Based Criteria Toward Ingredient-Based Restrictions

The proposed model combines established nutrient-related criteria, including **sugars, sodium, saturated fats, and trans fatty acids**, with additional criteria targeting the presence of specific ingredients, notably **sweeteners, colours, and flavourings**.

The inclusion of nutrients associated with adverse health outcomes when consumed excessively is understandable and consistent with established nutrition policy approaches.

However, extending the model to identify products for regulatory action based on the presence of colours, flavourings, or sweeteners raises additional questions.

These ingredients are subject to established safety assessment and authorization processes. Their presence in a food does not, in itself, demonstrate an adverse health effect or establish that consumption of the product contributes to obesity or NCDs.

The underlying rationale appears to relate partly to the role these ingredients may play in increasing the “attractiveness” or “palatability” of foods. Yet food appeal cannot, by itself, be considered evidence of a public health risk warranting regulatory intervention.

The critical question is whether sufficient scientific evidence exists to demonstrate that the presence of these ingredients, independently or in combination with other product characteristics, justifies restrictions on marketing, labelling, or taxation. No such evidence was clearly presented during the session.

3. Validation Against NOVA Is Not Equivalent to Demonstrating Health Risk

A significant component of the scientific presentation focused on evaluating the extent to which the proposed model identifies products classified as ultra-processed foods under the NOVA framework.

The analysis relied on an extensive international database of packaged foods and demonstrated substantial correspondence between products identified by the proposed model and those classified as ultra-processed according to NOVA-derived ingredient criteria.

While this analysis may demonstrate the model's ability to reproduce certain classifications, **it does not necessarily establish its capacity to identify foods that contribute to adverse health outcomes.** Agreement between two classification systems is not equivalent to validation against independently demonstrated health risks.

Moreover, the analysis appears to have used NOVA-related ingredient criteria rather than a comprehensive assessment of food processing characteristics.

This distinction is important, particularly given the ongoing scientific debate regarding the extent to which associations between ultra-processed food consumption and adverse health outcomes can be attributed to processing itself, nutritional composition, dietary patterns, or other contributing factors.

A more meaningful validation would examine whether the **proposed model improves the identification of products associated with adverse health outcomes beyond what can already be achieved through established nutrient profiling approaches.**

4. Regulatory Instruments Must Be Justified by Evidence of Effectiveness

The proposed model is intended to support a broad range of regulatory interventions, including marketing restrictions, front-of-pack labelling, and potentially fiscal measures such as taxation.

These interventions differ considerably in their objectives, mechanisms, economic implications, and potential consequences. A model that identifies products for policy consideration should not automatically be considered sufficient justification for applying any, part or all of these instruments.

For example, should a food become subject to taxation simply because it contains an authorized food colour or flavouring, even when its nutritional composition does not exceed established thresholds?

Such an approach would require a particularly robust scientific and economic justification, including evidence that the measure would produce measurable public health benefits.

Similarly, the presentation referred to regulatory experiences in several countries as supporting the proposed approach. However, the adoption of regulatory measures does not, in itself, demonstrate their effectiveness.

It remains essential **to establish whether these interventions have been adequately evaluated**, particularly regarding their contribution to reducing obesity and diet-related NCDs, their effects on dietary behaviours, and their broader social and economic consequences.

5. Addressing Multifactorial Public Health Challenges Requires Proportionate Responses

Obesity and diet-related NCDs are complex, multifactorial challenges influenced by overall dietary patterns, physical activity, socioeconomic conditions, food environments, individual behaviours, and numerous other determinants.

Food regulation can **undoubtedly contribute to improving dietary environments** and supporting healthier choices. However, regulatory **instruments must be selected according to their demonstrated ability to address clearly identified problems.**

There is a risk that an **excessively broad product classification system could encourage the application of restrictions without sufficiently distinguishing between products, dietary contexts, levels of consumption, and the actual contribution of individual foods to adverse health outcomes**.

This raises broader questions about regulatory proportionality and the distinction between measures designed to address demonstrated risks and those intended primarily to influence consumer behaviour.

Public health policies may legitimately seek to influence behaviours. Nevertheless, when binding regulatory instruments are used, t**heir justification should be transparent, evidence-based, proportionate, and supported by an assessment of expected benefits and potential unintended effects**.

6. Preliminary Conclusions and the Need for Further Assessment

This preliminary assessment is based exclusively on the presentations delivered during the launch of the proposed WHO model.

A detailed examination of the consultation report, its supporting scientific references, methodological assumptions, and proposed regulatory applications remains necessary before reaching definitive conclusions.

In particular, it will be important to determine whether the supporting documentation adequately addresses questions that were not resolved during the presentation.

The initiative offers an opportunity to revisit the **role of food profiling in supporting public health policies**. However, it also highlights the importance of maintaining **a clear distinction between nutritional guidance, food classification, and the scientific justification of binding regulatory measures**.

The fundamental concern is not whether governments should act to prevent obesity and diet-related NCDs. They should.

The concern is whether **the proposed model provides a sufficiently robust scientific and regulatory foundation for determining which foods should be subjected to restrictions**, and whether those restrictions can reasonably be expected to deliver measurable public health benefits.

Internationally recognized principles of risk analysis, evidence-based decision-making, regulatory proportionality, and impact assessment should remain central to this discussion.

Ultimately, the effectiveness of food regulation should be judged not by the number of products classified or the number of regulatory measures introduced, but by **its demonstrated contribution to improving population health while minimizing unintended consequences.**