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RE: Comments on the WHO Guideline Development Group for Ultra-Processed Foods

Submitted by: Institute of Food Technologists

The Institute of Food Technologists (IFT) is thankful for the opportunity to provide comments on the WHO Guideline Development Group for Ultra-Processed Foods. IFT is a global organization of scientists with expertise across the food system who are committed to advancing the science of food. We believe science is essential to ensure the global food system is equitable, sustainable, safe, and nutritious.

Our comments are offered to strengthen the transparency, representativeness, and scientific integrity of the guideline development process for the WHO Guidelines on Ultra-Processed Foods (UPFs). They focus on the following areas: (1) transparency and timing of conflict-of-interest (COI) disclosure, (2) diversity and balance of perspectives within the guideline development group (GDG), (3) transparency in the nomination and selection process, and (4) the breadth of technical expertise within the GDG.

The public notice states that this comment process is “an integral component of WHO’s Conflicts of Interest assessment policy as to strengthen public trust and transparency in connection with WHO meetings involving the provision of technical/normative advice.” We agree that transparency is critical to public trust in the guidelines that will be developed through this process, yet we note that the declarations of interest for the members of the guideline group will not be revealed until the publication of the guidelines. This delay in releasing declarations of interests limits the ability to make a fully informed public comment and reduces the transparency needed to support accountability, central to WHO’s goals. Once group deliberations are completed, external stakeholders cannot assess if biases or conflicts were adequately mitigated through the process.

We understand that releasing declarations of interest with the final guidelines is the standard practice of WHO, but we encourage WHO to release the declarations of interest for this guideline development group prior to deliberations as well as plans for mitigating any potential biases during the deliberation process. This is similar to practices of other national organizations responsible for developing guidelines, such as the European Food Safety Authority (EFSA)¹ and the

¹ https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/SOP-039_A.pdf

UK National Institute for Health and Care Excellence (NICE)². These organizations publish declarations of interest before committee work begins and note any changes that happen during the guideline process.

In the absence of declarations of interest, our assessment of the diversity and balance of perspectives reflect only the publicly available information on the individuals in the committee and alignment with WHO guidelines. WHO's Guidelines for Declaration of Interests (Experts)³ and Handbook for Guideline Development⁴ defines COI broadly as "any interest declared by an expert that may affect or reasonably be perceived to affect the expert's objectivity and independence in providing advice to WHO." These include financial and nonfinancial conflicts. Examples of nonfinancial conflicts included in the Handbook:

- "a desire for professional advancement or prestige or a drive to publish, to obtain research funding, or to improve one's personal standing in the scientific community," or
- "intellectual conflict of interest" defined as "academic activities that create the potential for an attachment to a specific point of view that could unduly affect an individual's judgment about a specific recommendation."

Additionally, the Handbook suggests that responsible officers "should consider limiting an expert's participation" when the expert:

- "is an author or co-author of one or more key studies within the body of evidence underpinning a recommendation, particularly if the body of evidence is limited"
- "is or has been involved in a major academic programme of work that concerns the intervention, approach or exposure under consideration in the guideline, including conducting trials or systematic reviews and publishing conclusions or opinions on the benefits and/or harms."

Consideration of these categories is important for evaluating balance within the GDG. We note that the proposed membership on the GDG for UPF includes a substantial portion of individuals who have publicly advocated for limitation or elimination of UPFs independent of nutritional content⁵. There are a few proposed members that hold more nuanced positions and advocate that other aspects of food beyond processing, such as nutritional quality, should also be considered in policy discussions, but these individuals appear to be a substantial minority (~15%). According to the terms of reference, 75% of the expert group must agree to approve a proposed decision. A minority of the current size would have limited ability to influence outcomes if the deliberations reflected strongly held positions by the majority.

² www.nice.org.uk/Media/Default/About/Who-we-are/Policies-and-procedures/declaration-of-interests-policy.pdf

³ <https://www.emro.who.int/images/stories/polio/doi-guidelines.pdf>,
<https://www.who.int/publications/m/item/declaration-of-interests-for-who-experts>

⁴ <https://www.who.int/groups/guidelines-review-committee>

⁵ <https://www.thelancet.com/series-do/ultra-processed-food>; <https://www.eurekalert.org/news-releases/1105884>,
<https://piaui.folha.uol.com.br/materia/carlos-monteiro-usp-ultra-processed-foods/>;
<https://www.imperial.ac.uk/news/258854/imperial-conference-tackling-harms-ultra-processed-foods/>

The Handbook states that to minimize the risks posed by COI, “every effort should be made to balance the perspectives of the individuals in the group” and the members of the GDG should “be composed of individual with diverse perspectives, training and experiences to keep the recommendations from reflecting a single viewpoint that was conceived before examining and discussing the systematic review of the evidence.” In accordance with these principles, we recommend that WHO reconsider the balance of the committee and add more expertise of “people whose opinions are known to differ” from the predominant perspectives currently represented. A recent example of how this balance can be achieved is the multidisciplinary committee convened to develop a research roadmap for UPF, which included representation from clinical nutrition science, epidemiology, food technology, and public health⁶. Individuals with alternative or moderating perspectives should be as close as possible to being in equal portion to those experts whose positions reflect strongly held policy perspectives. Additional expertise could include individuals emphasizing the nutritional quality of foods in policy evaluation, as well as food technologists and/or public health professionals with experience in food processing.

The current imbalance may also reflect factors in the nomination or selection process that result in inadvertent bias (which WHO also addresses in the Handbook⁷). However, this is difficult to assess without knowing the individuals that were nominated but not included. In the interest of transparency, we encourage WHO to provide an aggregated list of the nominees and the reason for exclusion to clarify how balance was pursued in the development of the committee. This could be done with anonymized data that only includes expertise area or affiliation.

We note that several of the scientists on the provisional GDG have written or signed onto an open letter insisting that other scientists should not use Nova or UPF terminology in their research efforts to further refine the Nova classification⁸. Furthermore, they called upon all scientists to “boycott” an expert workshop on the topic of UPF and the overall research initiative. This appears to limit scientific progress and dialogue. Research conducted by multiple research groups with differing perspectives and approaches can all contribute to the refinement of a concept. However, to date, refinements to the Nova classification have come largely from the original research group, which includes some members of this provisional committee. This approach seems to indicate an “attachment to a specific point of view,” as noted in the Handbook, that may represent an

⁶ <https://www.sciencedirect.com/science/article/pii/S2161831323013789>

⁷ “If individuals with a particular viewpoint have a dominant role in selecting GDG members, this can lead to the selection of members that support a particular recommendation (so called “committee stacking”).”
<https://www.who.int/groups/guidelines-review-committee>

⁸ <https://drive.google.com/file/d/1SDWKWiArE8hC0j9WeSEpuAm76P9L7CQh/view>; www.fsp.usp.br/nupens/wp-content/uploads/2025/02/Open-Letter-to-Prof.-Susanne-Bugel-Regarding-the-Novo-Nordisk-Project-to-Create-a-New-Generation-of-the-Nova-Classification.pdf, https://www.linkedin.com/posts/phillip-baker-7b34843_open-letter-of-support-for-novapdf-activity-7301747973242200064-39Ah/

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intellectual COI requiring management. Given these public positions, WHO should publicly disclose how intellectual interests will be managed to ensure diverse scientific viewpoints are represented in the deliberations.

We also suggest WHO consider the precedent established by other guideline development groups, such as for tuberculosis (TB). In the module for recommendations on types of tests for TB⁹, WHO excluded the scientists responsible for developing testing assays because of conflict of interest. In the current provisional GDG, the scientist(s) responsible for developing the term UPF and the Nova classification are included in the committee without any indication of how the conflict of interest will be managed. The Handbook outlines several options for managing COI, including restricting participation in the formulation and ratification of recommendations or, in some cases, excluding individuals from participation. Given the precedent in other WHO GDGs, WHO may consider applying a similar approach for the developers of the Nova system.

The composition of the provisional GDG also does not yet reflect the full range of scientific domains necessary to address the questions under consideration. The call for experts prioritized nutrition and epidemiology but excluded food science or ingredient safety experts. The GDG will likely consider the processing steps to make food, unit operations and the use of additives and ingredients in food, all of which fall into the expertise of food science and technology. Incorporating expertise in food science, technology, and food additive/ingredient safety would support a balanced interpretation of the evidence related to processing and enhance the scientific reliability of the resulting guidance. Engaging members or technical advisors from the Joint FAO/WHO Expert Committee on Food Additives (JECFA) or related Codex committees would provide access to established expertise in the risk, safety and functionality of certain additives in foods as well as the practical implications (e.g., availability, affordability) of limiting foods with various additives.

IFT appreciates the opportunity to respond to this call for comment. We offer these comments in the spirit of supporting WHO's commitment to a guideline process that is transparent, balanced, and includes a broad range of scientific expertise relevant to UPFs. Early transparency in management of conflicts of interest and expanding the expertise represented will strengthen the credibility and usefulness of the final guidelines for global stakeholders. We thank the WHO for considering our input. Please contact Anna Rosales, Vice President of Science & Policy (arosales@ift.org) if IFT may be of further assistance.

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⁹ <https://tbksp.who.int/en/node/2293>