



International Special
Dietary Foods Industries

Foods For Special Dietary Uses (FSDU)

SEPTEMBER 2018
UPDATED: AUGUST 2020,
JULY 2025
Guidance Document

DISCLAIMER

This guidance document is intended to provide information on Foods for Special Dietary Uses (FSDU) in the context of the Codex Alimentarius. It is for general information purposes only and does not constitute legal or other professional advice. It does not replace the relevant Codex Standards and should be read in conjunction with all the relevant texts at Codex Alimentarius level. The information provided is without prejudice to national regulations and interpretations. A full and updated list of Codex texts ([standards](#), [guidelines](#) and [codes of practice](#)) contained within this document can be found on the Codex website. ***Sections in italic are directly taken from Codex texts.***

The development of this brochure has been coordinated by Xavier Lavigne, ISDI Board Member and Marian Brestovansky, (former) ISDI Secretariat. Members of the ISDI Working Groups on Medical and Adult Dietetic Nutrition & Infant and Young Child Nutrition contributed to this work.

USER GUIDE

TARGET GROUP

The audience for the brochure is food business manufacturers and national authorities.

PURPOSE OF THE BROCHURE

The brochure provides the international background regarding Foods for Special Dietary Uses (FSDU) based on THE GENERAL STANDARD FOR THE LABELLING OF AND CLAIMS FOR PREPACKAGED FOODS FOR SPECIAL DIETARY USES — [CODEX STAN 146-1985](#), which defines at international level this category of products.

The [CODEX ALIMENTARIUS](#) international food standards, guidelines and codes of practice contribute to the safety, quality and fairness of international food trade. Codex standards are based on sound science provided by independent international risk assessment bodies or ad hoc consultations organised by FAO and WHO.

The brochure is for general information purpose and aims to facilitate the reading and understanding of THE GENERAL STANDARD FOR THE LABELLING OF AND CLAIMS FOR PREPACKAGED FOODS FOR SPECIAL DIETARY USES — [CODEX STAN 146-1985](#).

The brochure can be used as a support for Food Business Manufacturers as an educational material (e.g. internal trainings) or as a background element for discussions with national authorities regarding Foods for Special Dietary Uses (FSDU).

The brochure does not consider the specific situation of FSDU or other specialised nutrition products in each country and should not be considered in isolation.

KEY MESSAGES OF THE BROCHURE

- 1) Foods for Special Dietary Uses are defined at Codex Alimentarius level as *foods which are specially processed or formulated to satisfy particular dietary requirements which exist because of a particular physical or physiological condition and/or specific diseases and disorders and which are presented as such*⁽¹⁾. *The composition of these foodstuffs must differ significantly from the composition of ordinary foods of comparable nature, if such ordinary foods exist.*
- 2) Codex Alimentarius also further defines specific FSDU through different texts that cover among others and in broad terms infant formula, follow-up formula for older infants and product for young children, complementary foods, foods for special medical purposes, meal replacement and total diet replacement, gluten free food, low sodium food.
- 3) Other FSDU exist and are recognised in some national regulations, but are not necessarily defined at Codex Alimentarius level. One example is the sports food category.
- 4) FSDU remain food products and should therefore comply with all the relevant Codex texts and requirements established by Codex Alimentarius, unless provided otherwise.
- 5) Standardised terminology should be used when defining or describing FSDU.

⁽¹⁾ This includes foods for infants and young children.

CONTENT OF THE GENERAL STANDARD FOR THE LABELLING OF AND CLAIMS FOR PREPACKAGED FOODS FOR SPECIAL DIETARY USES — CODEX STAN 146-1985

The Standard for the Labelling and Claims for Prepackaged Foods For Special Dietary Uses (FSDU) focuses on the labelling and claims elements in relation to prepackaged foods falling into the category of Foods for Special Dietary Uses.

There are no composition criteria as this Standard focuses on the general principles in relation to labelling and claims for this specific category of products.

The Standard for the Labelling and Claims for Prepackaged Foods For Special Dietary Uses ([CODEX STAN 146-1985](#)) provides for the following elements (further detailed in the following pages of this Guidance document):

| | | |
|---|---|---|
| 1 | SCOPE | Provides the scope of the Standard |
| 2 | DESCRIPTION | Provides the description |
| 3 | GENERAL PRINCIPLES | Provides the general principles |
| 4 | MANDATORY LABELLING OF PREPACKAGED FOODS FOR SPECIAL DIETARY USES | Defines the mandatory labelling requirements |
| 5 | ADDITIONAL MANDATORY REQUIREMENTS FOR SPECIFIC FOODS | Defines the additional mandatory labelling requirements |
| 6 | EXEMPTIONS FROM MANDATORY LABELLING REQUIREMENTS | Provides the exemptions from the mandatory labelling requirements |
| 7 | OPTIONAL LABELLING | Provides the optional labelling requirements |
| 8 | PRESENTATION OF MANDATORY INFORMATION | Describes the presentation of mandatory information |

CODEX ALIMENTARIUS DEFINITION OF FSDU

The Codex General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses (CODEX STAN 146-1985), defines in section 2.1 *Foods for Special Dietary Uses as those foods which are specially processed or formulated to satisfy particular dietary requirements which exist because of a particular physical or physiological condition and/or specific diseases and disorders and which are presented as such⁽¹⁾. The composition of these foodstuffs must differ significantly from the composition of ordinary foods of comparable nature, if such ordinary foods exist.*

FSDU

General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses (CODEX STAN 146-1985) - applies to all FSDU

ISDI COMMENT

Foods for Special Dietary Uses (FSDU) are products that have been uniquely formulated and processed to address the dietary needs of individuals for whom ordinary foods may not be an acceptable option. These products provide important nutritional options for individuals consuming specialised diets, so the safety and nutritive value of FSDU are even more critical than foods intended for the general population.

Food standards, such as international Codex standards, and regulations play a key role in enhancing the safety, quality and accessibility of FSDU by establishing composition and nutritional requirements, ensuring product labels provide accurate information about nutritional content and intended use, setting hygiene and safety practices, and facilitating global trade.

For these standards and regulations to be effective, it is essential to have a common understanding on the terms and definitions used to describe FSDU products and categories. Using terms that are non-scientific or unrecognised in international regulatory standards can cause confusion, carry negative connotations, hinder compliance and potentially harm public health. **See Annex I**

FSDU COMMODITIES

The following FSDU commodities have standards established by the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU):

| | |
|---------------------------------|--|
| Infant Formula and <i>IFSMP</i> | Infant formula and <i>formulas for special medical purposes intended for infants⁽²⁾</i> (CODEX STAN 72-1981) Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Young Children (CAC/GL 10-1979) |
| Follow-up Formula | Follow-up Formula for Older Infants and Product for Young Children (CODEX STAN 156-1987) Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Young Children (CAC/GL 10-1979) |
| Baby Food | Formulated Complementary Foods for Older Infants and Young Children (CAC/GL 8-1991) Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981) Standard for Canned Baby Foods (CODEX STAN 73-1981) |

| | |
|--|--|
| Food for Special Medical Purpose (FSMP) | <i>Standard for Labelling of and Claims for Foods for Special Medical Purposes⁽²⁾</i> (CODEX STAN 180-1991) <i>Formulas for special medical purposes intended for infants⁽²⁾</i> (CODEX STAN 72-1981) <i>Ready to use Therapeutic Food (RUTF)⁽²⁾</i> (CAC/GL 95-2022) |
| Formula foods for use in weight control diets | Formula Foods for Use in Weight Control Diets (CODEX STAN 181-1991) |
| <i>Formula foods for use in very low energy diets for weight reduction</i> | <i>Formula Foods for Use in Very Low Energy Diets for Weight Reduction⁽²⁾</i> (CODEX STAN 203-1995) |
| Gluten Free Food | Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CODEX STAN 118-1979) |
| Low Sodium Food | Standard for Special Dietary Foods with Low-Sodium Content (Including Salt Substitutes) (CODEX STAN 53-1981) |

OTHER EXAMPLE OF FSDU CATEGORIES NOT SPECIFICALLY DEFINED BY CODEX

| | |
|-------------|---|
| Sports Food | Sports food: FSDU specifically designed, formulated and marketed in relation to physical activity, physical performance and/or post-exercise recovery & bearing nutrition and/or health claim(s). |
| Other FSDU | Other products that meet the definition of FSDU but do not already fall under the above mentioned categories (e.g. supplementary food for a specific population, such as pregnant women, lactating mothers, children, adolescents and the elderly). |

⁽¹⁾ This includes foods for infants and young children.

⁽²⁾ FSMP.

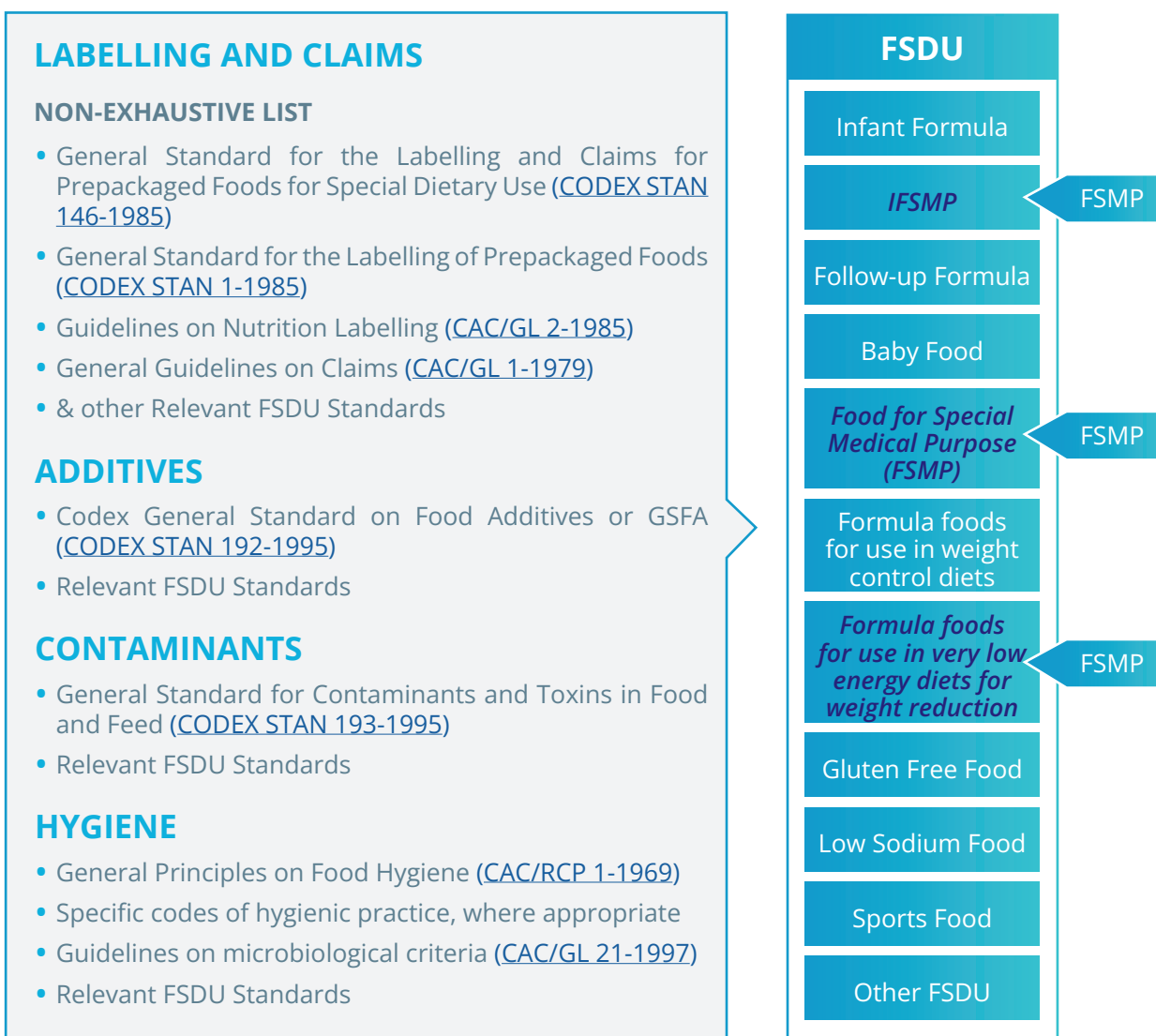
FSDU IN THE CODEX ALIMENTARIUS FRAMEWORK

Other Codex Standards, Guidelines, and texts (or documents) applicable to FSDU

Requirements applicable to Food for Special Dietary Use (FSDU) are defined in the General Standard for the labelling of and claims for prepackaged Foods for Special Dietary Use ([CODEX STAN 146-1985](#)).

Many other Codex Standards, Guidances and Codes are applicable to FSDU. The graph below is a simplified and non-exhaustive representation of this interaction between various Codex Texts.

The FSDU Standard should therefore never be read in isolation and should always be considered in conjunction with other relevant Codex texts. It is the responsibility of the Food Business Manufacturer to assess all the relevant Codex and national/regional requirements applicable to FSDU before marketing the product.



For further details on Foods for Special Medical Purposes (FSMP), see the [ISDI Brochure on FSMP](#).
For additional reading on Gluten Free Food, see the [ISDI Brochure on Gluten Free Food](#).

SPECIFIC REQUIREMENTS FROM THE CODEX GENERAL STANDARD FOR THE LABELLING OF AND CLAIMS FOR PREPACKAGED FOODS FOR SPECIAL DIETARY USES

GENERAL PRINCIPLES

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|--------------------------------|--|
| FSDU presentation | <i>FSDU shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.</i> |
| Advice from a qualified person | <i>Nothing in the labelling and advertising of FSDU shall imply that advice from a qualified person is not needed.</i> |

MANDATORY LABELLING OF PREPACKAGED FSDU

The label of all prepackaged Foods for Special Dietary Uses shall bear the below mandatory information as applicable to the food being labelled, except to the extent otherwise expressly provided in a specific FSDU Codex Standard.

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|---------------------|--|
| Name of the FSDU | <p><i>In addition to the declaration of the name of the food in accordance with Section 4.1 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985) the following provisions apply:</i></p> <ul style="list-style-type: none"> <i>• The designation “special dietary”, “special dietetic” or an appropriate equivalent term, may be used in conjunction with the name only where the product corresponds to the definition [of an FSDU].</i> <i>• The characterizing essential feature, but not the condition for which the food is intended, shall be stated in appropriate descriptive terms in close proximity to the name of the food.</i> <p>ISDI COMMENT This highlights the importance of providing proper information, including through the use of appropriate descriptive terms. Based on this FSDU standard, these are mandatory statements that should describe the specificity of the product.</p> <p>See the ISDI Brochure on Foods for Special Dietary Uses & Claims</p> |
| List of ingredients | <i>The declaration of the list of ingredients shall be in accordance with Section 4.2 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |

MANDATORY LABELLING OF PREPACKAGED FSDU

Nutrition Labelling

In addition to the provisions established by the Guidelines on Nutrition Labelling (CAC/GL 2-1985), the FSDU Standard (CODEX STAN 146-1985) provides that the Nutrition labelling of an FSDU shall include the following:

- 1. The amount of energy per 100 grammes or 100 ml of the food as sold and where appropriate per specified quantity of the food as suggested for consumption, expressed in kilocalories (kcal) and kilojoules (kJ).*
- 2. The number of grammes of protein, available carbohydrate and fat per 100 grammes or 100 ml of the food as sold and where appropriate per specified quantity of the food as suggested for consumption.*
- 3. The total quantity of those specific nutrients or other components which provide the characterizing essential feature for the special dietary use for which the food is intended per 100 grammes or 100 ml of the food as sold and, where appropriate, per specified quantity of the food as suggested for consumption.*

ISDI COMMENT

Specific consideration should be given to Food for Special Dietary Uses (FSDU) including Foods for Special Medical Purposes (FSMP) when establishing front-of-pack nutrition labelling (FOPNL) as FSDU are tailored to meet the particular nutritional needs of the targeted group. FOPNL established for adult general healthy population are not suitable for infants and young children. Products specifically formulated for this target population should be excluded from FOPNL for products intended for the general population.

The Codex Guidelines (Annex 2 of Guidelines on Nutrition Labelling (CAC/GL 2-1985) directly excludes the following product categories:

- Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants ([CODEX STAN 72-1981](#))
- Standard for Follow-up Formula for Older Infants and Young Children ([CODEX STAN 156-1987](#))
- Standard for Labelling of and Claims for Foods for Special Medical Purposes ([CODEX STAN 180-1991](#)). FSMPs include formula foods for use in very low energy diets for weight reduction ([CODEX STAN 203-1995](#))

Additionally, the Codex Guidelines authorise for the consideration of other exclusions of FSDU dependent on the type of FOPNL. The following foods should be excluded from FOPNL:

- Canned Baby Foods as included in the Standard for Canned Baby Foods ([CODEX STAN 73-1981](#))
- Processed Cereal-Based Foods for Infants and Young Children as stipulated in the Standard for Processed Cereal-Based Foods for Infants and Young Children ([CODEX STAN 74-1981](#))
- Formula Foods for Use in Weight Control Diets as included in the Standard for Formula Foods for Use in Weight Control Diets ([CODEX STAN 181-1991](#))
- Guidelines on Formulated Complementary Foods for Older Infants and Young Children ([CAC/GL 8-1991](#))

See the [ISDI Brochure on Foods for Special Dietary Uses and Front of Pack Nutrition Labelling](#).

MANDATORY LABELLING OF PREPACKAGED FSDU

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| Net contents and drained weight | <i>The declaration of net contents and drained weight shall be in accordance with Section 4.3 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |
| Name and address | <i>The name and address shall be declared in accordance with Section 4.4 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |
| Country of origin | <i>The country of origin shall be declared in accordance with Section 4.5 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |
| Lot indication | <i>The lot identification shall be declared in accordance with Section 4.6 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |
| Date marking Storage instructions Storage of open food | <p><i>In addition to the declaration of date marking and storage instructions in accordance with Section 4.7 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985), the following provisions apply:</i></p> <p><i>Storage of opened food.</i></p> <p><i>Storage instructions of opened packages of a Foods for Special Dietary Uses shall be included on the label if necessary to ensure that the opened product maintains its wholesomeness and nutritive value. A warning should be included on the label if the food is not capable of being stored after opening or is not capable of being stored in the container after opening.</i></p> |

| ADDITIONAL MANDATORY REQUIREMENTS FOR SPECIFIC FOODS | |
|---|---|
| Quantitative labelling of ingredients | <i>The quantitative labelling of ingredients shall be in accordance with Section 5.1 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |
| Claims | <i>Any claims made for the foods covered by this standard shall be in accordance with the General Guidelines for Claims elaborated by the Codex Alimentarius Commission (CAC/GL 1-1979). See the ISDI Brochure on Foods for Special Dietary Uses & Claims</i> |
| Suitable for “special dietary uses” | <i>Where a claim is made that the food is suitable for “special dietary uses” that food shall comply with all provisions of this standard except as otherwise provided in a specific Codex Standard for FSDU.</i> |
| “This food is by its nature “X” “X” = essential distinguishing characteristic | <i>A food which has not been modified in accordance with the FSDU definition but is suitable for use in a particular dietary regimen because of its natural composition, shall not be designated “special dietary” or “special dietetic” or any other equivalent term. However, such a food may bear a statement on the label that “this food is by its nature “X” (“X” refers to the essential distinguishing characteristic), provided that such statement does not mislead the consumer.</i> |
| Prevention, alleviation, treatment or cure of a disease, disorder or particular physiological condition | <p><i>Claims as to the suitability of an FSDU for use in the prevention, alleviation, treatment or cure of a disease, disorder or particular physiological condition are prohibited unless they are:</i></p> <ol style="list-style-type: none"> <i>1. in accordance with the provisions of Codex standards or guidelines for foods for special dietary uses, and follow the principles set forth in such standards or guidelines; or</i> <i>2. in the absence of an applicable Codex standard or guideline, permitted under the laws of the country in which the food is distributed.</i> |
| Irradiated foods | <i>Irradiated foods for special dietary uses shall be labelled in accordance with Section 5.2 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |
| Additional or different provisions in a Codex standard for a food for special dietary use | <i>Nothing in the FSDU Codex Standard (CODEX STAN 146-1985) shall preclude the adoption of additional or different provisions in a Codex standard for a food for special dietary use, in respect of labelling, where the circumstances of a particular food would justify their incorporation in that standard.</i> |
| Exemptions from mandatory labelling requirements | <i>Exemptions from mandatory labelling requirements shall be in accordance with Section 6 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |
| Optional labelling | <i>Optional labelling of foods for special dietary uses shall be in accordance with Section 7 of the Codex General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |
| Presentation of mandatory information | <i>The presentation of the mandatory information shall be in accordance with Section 8 of the General Standard for the labelling of prepackaged foods (CODEX STAN 1-1985).</i> |

ANNEX I

ISDI RECOMMENDS USING INTERNATIONALLY AGREED CODEX ALIMENTARIUS DEFINITIONS OF FSDU

| | |
|--|---|
| <p>Foods for Special Dietary Uses</p> <p>CODEX STAN 146-1985</p> | <p><i>Foods for Special Dietary Uses are those foods which are specially processed or formulated to satisfy particular dietary requirements which exist because of a particular physical or physiological condition and/or specific diseases and disorders and which are presented as such (1). The composition of these foodstuffs must differ significantly from the composition of ordinary foods of comparable nature if such ordinary foods exist.</i></p> <p><i>(1) This includes foods for infants and young children.</i></p> |
| <p>Infant formula</p> <p>CODEX STAN 72-1981</p> | <p><i>Infant formula means a breastmilk substitute specially manufactured to satisfy, by itself, the nutritional requirements of infants during the first months of life up to the introduction of appropriate complementary feeding.</i></p> |
| <p>Formulas for Special Medical Purposes for Infants</p> <p>CODEX STAN 72-1981</p> | <p><i>Formula for special medical purposes intended for infants means a substitute for human milk or infant formula that complies with Section 2, Description, of the Standard for the Labelling of and Claims for Foods for Special Medical Purposes (CODEX STAN 180-1991) and is specially manufactured to satisfy, by itself, the special nutritional requirements of infants with specific disorders, diseases or medical conditions during the first months of life up to the introduction of appropriate complementary feeding.</i></p> |
| <p>Follow-up Formula for Older Infants</p> <p>CODEX STAN 156-1987</p> | <p><i>Follow-up formula for older infants means a product, manufactured for use as a breastmilk-substitute, as a liquid part of a diet for older infants when progressively diversified complementary feeding is introduced.</i></p> |
| <p>Product for Young Children⁽¹⁾</p> <p>CODEX STAN 156-1987</p> | <p><i>Drink for young children with added nutrients or product for young children with added nutrients or drink for young children or product for young children means a product manufactured for use as a liquid part of the diversified diet of young children.</i></p> |
| <p>Complementary Foods</p> <p>CAC/GL 8-1991</p> | <p><i>Formulated Complementary Foods for Older Infants and Young Children means foods that are suitable for use during the complementary feeding period. These foods are specifically formulated with appropriate nutritional quality to provide additional energy and nutrients to complement the family foods derived from the local diet by providing those nutrients which are either lacking or are present in insufficient quantities.</i></p> |
| <p>Ready-to-Use Therapeutic Foods</p> <p>CAC/GL 95-2022</p> | <p><i>Ready-to-use therapeutic foods (RUTF) are foods for special medical purposes and are high energy and contain adequate protein and other essential nutrients for the dietary management of children from 6 to 59 months with severe acute malnutrition without medical complications with appetite. These foods should be soft or crushable and should be easy for children to eat without any prior preparation.</i></p> |

⁽¹⁾ Also known as young child formula, toddler milks or growing-up milks.

| | |
|---|---|
| <p>Foods for Special Medical Purposes (FSMP)</p> <p>CODEX STAN 180-1991</p> | <p><i>Foods for special medical purposes are a category of foods for special dietary uses which are specially processed or formulated and presented for the dietary management of patients and may be used only under medical supervision. They are intended for the exclusive or partial feeding of patients with limited or impaired capacity to take, digest, absorb or metabolize ordinary foodstuffs or certain nutrients contained therein, or who have other special medically-determined nutrient requirements, whose dietary management cannot be achieved only by modification of the normal diet, by other foods for special dietary uses, or by a combination of the two.</i></p> |
| <p>Formula Foods for Use in Weight Control Diets</p> <p>CODEX STAN 181-1991</p> | <p><i>Formula foods for use in weight control diets are foods which, when presented as "ready-to-serve" or when prepared in conformity with the directions for use, are presented as a replacement for all or part of the total daily diet.</i></p> |
| <p>Formula Foods for Use in Very Low Energy Diets for Weight Reduction</p> <p>CODEX STAN 203-1995</p> | <p><i>A formula food for use in very low energy diets is a food specially prepared to supply a minimum amount of carbohydrates and the daily requirements of the essential nutrients in 450-800 kcal which represents the sole source of energy intake.</i></p> |
| <p>Special Dietary Foods with Low-Sodium Content</p> <p>CODEX STAN 53-1981</p> | <p><i>Special dietary foods with low sodium content are foods whose special dietary value results from the reduction, restriction, or removal of sodium.</i></p> |
| <p>Foods for Special Dietary Use for Persons Intolerant to Gluten</p> <p>CODEX STAN 118-1979</p> | <p><i>Gluten-free foods are dietary foods</i></p> <p><i>a) consisting of or made only from one or more ingredients which do not contain wheat (i.e. all Triticum species, such as durum wheat, spelt, and khorasan wheat, which is also marketed under different trademarks such as KAMUT), rye, barley, oats (1) or their crossbred varieties, and the gluten level does not exceed 20 mg/kg in total, based on the food as sold or distributed to the consumer, and/or</i></p> <p><i>b) consisting of one or more ingredients from wheat (i.e. all Triticum species, such as durum wheat, spelt, and khorasan wheat, which is also marketed under different trademarks such as KAMUT), rye, barley, oats (1) or their crossbred varieties, which have been specially processed to remove gluten, and the gluten level does not exceed 20 mg/kg in total, based on the food as sold or distributed to the consumer.</i></p> <p><i>(1) Oats can be tolerated by most but not all people who are intolerant to gluten. Therefore, the allowance of oats that are not contaminated with wheat, rye or barley in foods covered by this standard may be determined at the national level.</i></p> |

EXAMPLES OF MISLEADING TERMINOLOGY IN RELATION TO FSDU

The purpose of FSDU is to meet the specific nutritional requirements of people with special dietary needs, meaning that they are safe and nutritionally appropriate for certain vulnerable populations. For the intended nutritional purpose to be met, it is critical for FSDU to be used as instructed and, in some cases, it may be necessary to follow guidance from a healthcare professional. Appropriate descriptive terms are important for the correct and appropriate use of FSDU.

Because FSDU are '**specially** processed or formulated', terms such as 'ultra-processed' and 'artificial' are sometimes incorrectly used to describe them, even though these terms lack commonly accepted regulatory meanings and definitions.

- **Ultra-processed:** This term is not internationally defined and lacks a scientific basis. Almost all foods are processed in some way, and there is no universally agreed definition of what constitutes an ultra-processed food. The term 'ultra-processed' has been popularised by the Nova classification, but this system is not limited to processing. It has known difficulties when classifying foods⁽¹⁾ and has been rejected (along with other food classification systems) by numerous public authorities as a valid basis for categorising foods⁽²⁾. Furthermore, associating this term with the healthiness of foods is misleading and potentially harmful, especially for FSDU, as it may lead to the avoidance or displacement of nutritionally necessary products.
- **Artificial:** 'Artificial' is a term that has no defined meaning in relation to food and may have negative connotations when applied to certain food categories. It can also be misleading as 'artificial' could cover many different concepts, depending on the context, such as tube-feeding (i.e. in a medical setting) or 'synthetic' foods, such as lab-grown meat.

This wording should not be used in general and especially not in relation to FSDU products.

⁽¹⁾ [Toward a science-based classification of processed foods to support meaningful research and effective health policies.](#)

⁽²⁾ [See, for example:](#)

- [UK Scientific Advisory Committee on Nutrition \(SACN\) Statement on processed foods and health](#)
- [Nordic Nutrition Recommendations](#)
- [Food Standards Scotland Position paper: Processed and ultra-processed foods](#)
- [USDA Scientific Report of the 2025 Dietary Guidelines Advisory Committee](#)
- [French Food Safety Authority \(ANSES\) Scientific Opinion related to the characterisation and assessment of health impacts of consuming ultra-processed foods](#)

NOTES

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International Special
Dietary Foods Industries

INTERNATIONAL SPECIAL DIETARY FOODS INDUSTRIES (ISDI)

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