
THE GLOBAL NON-ALCOHOLIC BEVERAGE INDUSTRY SUPPORTS SCIENCE-BASED FOOD AND NUTRITION POLICIES

The global non-alcoholic beverage industry recognizes the need for action to achieve global goals for reducing premature mortality from non-communicable diseases (“NCDs”), as part of ensuring healthy lives and promoting well-being for all.

Our industry actively contributes to the global goals. We recognize that continued progress requires a strong focus on helping people build and maintain healthy dietary patterns, including reformulating beverages to offer more choices with low or no sugar and more package sizes alongside clear information about the safety of our products and nutritional composition.

Most people around the world enjoy a variety of beverages, relying on our products to deliver value, choice, refreshment, hydration, functionality, pleasure, community and more according to their cultural preferences. Therefore, we are committed to actively engaging with governments, civil society and other stakeholders to develop whole-of-society approaches that ensure safety, affordability, access, and innovation within the non-alcoholic beverage category while encouraging informed choices and balanced diets.

We support policies grounded in nutrition science and based on the totality of scientific evidence, and believe effective regulatory frameworks should protect consumer safety, promote transparency, and enable informed choice, while supporting collaborative, evidence-based approaches that advance public health goals without undermining affordability, access, food security, or innovation. In the spirit of collaboration, we offer the following perspectives and guiding principles for successful nutrition policy frameworks.

GUIDING PRINCIPLES FOR EFFECTIVE NUTRITION POLICY

As governments develop or adopt regulatory frameworks on nutrition policy, the non-alcoholic beverage sector strongly encourages incorporating the following core principles:

- **Nutrition policy should be based on the nutrition profile of foods and their role and contribution in overall dietary patterns, not on how food is prepared or “processed.”** Governments should define overall balanced dietary patterns that meet contexts and populations’ health needs, set recommendations for nutrients to encourage and nutrients to limit, and provide information that helps consumers understand and meet these recommendations.
- **Nutrition policy should be grounded in strong science, with an appropriate risk management approach.** Policy and regulation must be grounded in rigorous science and a robust body of high-quality objective evidence, incorporating the knowledge of food science and technology. Regulators should establish the types and standards of evidence

required to guide risk management reviews and decisions and should not adopt new regulations unless new, high-quality peer-reviewed evidence becomes available.

- **Nutrition policy should enable innovation that offers consumers benefits and support informed choice to fit diverse individual needs, cultures, and lifestyles, not unjustifiably limit or cast aspersions on choices.** An enabling environment for innovation and portfolio diversity, which includes basing regulations on evidence-based nutrient profiles, helps ensure that people can choose among products with varying nutritional profiles, portion sizes, and functional benefits as part of balanced diets that meet their individual needs. Regulations should avoid stigmatizing or unjustifiably restricting safe ingredients and products, which can mislead or confuse consumers, create unjustified fear, and do not advance the broader goal of promoting balanced, healthy diets. Policies should instead encourage science-based, consumer-driven reformulation to improve nutritional quality and help consumers build healthier dietary patterns (e.g., sugar, sodium and saturated fat reduction, nutrient fortification).
- **Consumer education and communication should be accurate and risk-based.** Communication and education approaches should reflect the complexity of nutrition science and empower consumers with practical, evidence-based guidance on overall diet quality, variety, moderation, portion sizes, and understanding nutrition labels. Messaging should be truthful, informative, and not misleading and should not cause unjustified alarm or undermine trust in nutrition guidance, such as by imposing oversimplified or overly broad warnings or categorizations. Such over-simplification risks undermining consumers' ability to distinguish foods with improved nutritional profiles to the detriment of public health.

SPECIAL CONSIDERATIONS REGARDING “PROCESSING” IF ADDRESSED IN NUTRITION POLICY

As noted above, the non-alcoholic beverage industry supports science-based policymaking based on nutritional profile of foods and their role in dietary patterns, not based on how foods are prepared. Any policy that nevertheless addresses how foods are prepared/processed should consider the following principles:

- **Maintain objectivity and neutrality: Any regulation that refers to processing should not state or assume that processing is inherently negative or harmful.** Any such regulation should acknowledge the purpose and benefits of processing (e.g., food safety, sensory quality, fortification that responds to public health needs, affordability, shelf-stability and waste reduction). Definitions should also maintain objectivity and neutrality in any reference to specific ingredients or categories of ingredients, and any conclusions about ingredient safety (whether nutritive or non-nutritive) must be based on scientifically-robust risk assessments and risk management.

- **Be mindful of unintended consequences that may negatively impact public health.** Negative characterizations of safe ingredients that are essential to reformulation, simply based on processing, may steer consumers away from options that can help support improved dietary patterns (e.g. low- and no-calorie sweeteners).
- **Exclude characteristics that are not related to the food itself:** Foods that are otherwise similar or identical should not be treated differently based on non-nutrition-related characteristics, such as the size of the company making the food, the type of food, the packaging type, or the nature of the food's sale and distribution.
- **Acknowledge that current scientific evidence demonstrates processing cannot be evaluated for health impacts independent of nutrient content:** As numerous food safety and health authorities around the world have agreed, the preponderance of evidence shows diet-related health outcomes are associated not with processing per se but rather with the underlying nutrient content of food and overall nutrient and energy intake. In fact, processing may allow increased content of nutrients to encourage (e.g., dietary fiber, vitamins and minerals) and/or decreased content of nutrients to limit (e.g., fat, sugar, salt).
- **Put all food in the context of overall diets:** No single food or ingredient can be termed "good" or "bad," "healthy" or "unhealthy" in isolation. All food and any definitions of food referring to processing must acknowledge that overall balanced dietary patterns can include a wide variety of foods with different characteristics and nutritional profiles.

Our Global Beverage Industry Commitments:

- **Front-of-Pack Labeling (FOPL):** The non-alcoholic beverage industry supports the effort of governments to introduce science-based interpretive front-of-package nutrition labeling, as it can be a useful tool for helping people make informed dietary choices as well as incentivizing companies to innovate and reformulate. ICBA Guidelines: <https://www.icba-net.org/industry-commitments/nutrition-labeling/>
- **Responsible marketing practices:** ICBA's member companies restrict marketing to children, ensuring parents are the decisionmakers about what their children eat and drink. The global non-alcoholic beverage industry has committed to refrain from marketing our beverages directly to those under 13 years of age as a baseline. ICBA Guidelines: <https://www.icba-net.org/industry-commitments/nutrition-labeling/>
- **Responsible energy drink sales, labeling and marketing:** ICBA members have adopted guidelines on the sales, marketing and labeling of energy drinks to ensure consumers have trust and information in all our products. ICBA Guidelines: <https://www.icba-net.org/industry-commitments/energy-drinks/>
- **Reformulating beverages to offer more lower- and no-sugar options.** We are responding to the UN call-to-action for our industry to reformulate beverages to reduce sugar and we recognize that reformulating foods and beverages to support a healthy diet is a [WHO Best Buy](#).
- **Standardization & Clarity:** As Codex Alimentarius Observers for over 25 years, ICBA and its members support harmonized food standards that allow for consistent, safe and efficient production—keeping prices affordable and ensuring product information and labeling are accurate and easy for consumers to understand.
- **Product Safety & Integrity:** Our members' beverages, across all categories, meet rigorous quality and safety standards. Protecting consumer trust and health is our foundation.