

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8 and 10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx ALIMENTARIUS COMMISSION

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COMMENTS OF INTERNATIONAL BABY FOOD ACTION NETWORK (IBFAN)

General comment

Since 1995, IBFAN's has advocated policy coherence between Codex standards and the recommendations of the World Health Assembly, namely the [International Code, the Global Strategy and/or the subsequent WHA Resolutions](#) on infant and young child feeding.

Lack of transparency, poor conflict of interest safeguards and the dominance of food corporations and powerful exporting nations has resulted in the adoption of too many standards that do not protect health and are not fit for purpose. These standards have been used for decades as a 'regulatory ceiling' for trade purposes to the detriment of the health and survival of infants and children. The standards have also contributed to the undermining of bio-diverse, traditional food cultures, as well as the deforestation, mono-cropping and land and sea-grabbing that has had a devastating impact on human and planetary health and rights.

Some Codex standards have now been improved and refer to some extent to WHA recommendations, opening the door to much better regulation.

AGENDA ITEM 8

CX/CAC 25/48/13, CX/CAC 25/48/13 Add.1

Codex strategic plan 2026-2031 – Monitoring framework

IBFAN was pleased to contribute to the discussions on the Strategic Plan in the hopes that Codex could transform its procedures and support the broader goals of sustainability, one health, food security and environmental protection.

Below are some of IBFAN's suggestions:

- **Adopt stricter Transparency and Conflict of Interest safeguards** to ensure that Codex decisions are protected from commercial influence and based on relevant and convincing evidence.
- **Allocate sufficient time to the prioritization of Codex work** taking into account the potential harm of poor codex standards and unnecessary products on human and planetary health.
- **Codex should stop its standards being used as a 'regulatory ceiling.'** Governments have the sovereign right to adopt any legislation they consider necessary to protect human health as long as it does not violate international trade principles.
- **Public funding of the Codex Trust fund must be written into the Codex Manual**
- **Safeguards regarding products for Emergencies.** Flexible labelling and flexible nutrient and ingredient content – especially in relation to infants and young children, is not consistent with Codex principles and is likely to put vulnerable populations at risk, compromising the health of those already in vulnerable situations.

AGENDA ITEM 10

CX/CAC 25/48/15

Matters arising from FAO and WHO

IBFAN strongly supports *WHO's technical support on the Code of marketing of breast-milk substitute* and urges Member States to take speedy action to adopt legislation to implement the [WHA Resolution 78.18 Regulating](#)

[the digital marketing of breast-milk substitutes](#) Digital marketing, including influencer marketing, has become the dominant form of marketing in many countries and when not effectively regulated, has a harmful impact on public health.

[A study](#) from WHO and UNICEF found that over half of new parents had been exposed to promotions from formula milk companies. In some countries, this was over 90%. protecting parents right to make decisions regarding children's feeding practices free from disinformation and advertising.

Legislation to implement the revised [Codex Standard for Follow-up Formula for Older infants and product for young children](#) (CXS 156-19and 87) is also urgent and would ensure that the marketing of all products targeting children 6-36 months is brought into line with WHA and WHO recommendations.

IBFAN strongly supports WHO's recommendations to safeguard policy setting from undue commercial influence and ensure appropriate interactions with the private sector. The protection of public health requires transparency and due diligence when identifying undue influence and conflicts of interest.

Codex Trust Fund: activity report

Since its establishment in 2003, IBFAN has advocated that the Codex Trust Fund is publicly funded by Member States. IBFAN calls on Codex to include safeguards to this effect in the Codex Procedural Manual to ensure that the CTF stays free of private sector funding that could affect the independence of Member States. Whilst acknowledging the funding problems identified in the [CTF2 Report](#) IBFAN believes that safeguards to protect against undue commercial influence are critically important and fundamental to the CTF's purpose.