

August 31, 2022

RE: Amendment to Colombian Resolution 810



To whom this may concern:

Soy Nutrition Institute Global (SNI Global) is the leading voice representing soy industry producers, suppliers, and users up and down the soy value chain involved with soybeans or soy ingredients intended for human consumption. We welcome the opportunity to submit comments about proposed changes by the Colombian Ministry of Health regarding Resolution 810, which concerns front-of-pack (FOP) nutrition labeling.

SNI Global supports policies that help our members responsibly market soy and soy ingredients as nutritious foods and products. We believe the amendment, as proposed, will result in consumer confusion, and that consumers using these FOP labels as a guide for their food purchases could end up avoiding soy-based meat and dairy alternatives, which can play a valuable role in the diet.

We are particularly concerned with the addition of the definition of ultra-processed food that classifies concentrated sources of soy protein isolate as ultra-processed. Concentrated sources of soy protein have been widely studied for their nutritional and health benefits across the entire lifespan. For example, soy protein lowers blood cholesterol levels¹ and promotes gains in muscle mass and strength in individuals engaged in resistance exercise to the same extent as animal protein.² Protein shakes containing soy protein isolate and vitamins and minerals are commonly sold globally as a replacement of 1-2 traditional meals per day, especially for those who do not have time to cook or consumers looking to manage their weight. There are many clinical studies showing the benefit of such products in helping to lose fat mass while increasing lean muscle mass.³⁻⁴

It is also important to recognize the role soy-based meat can have in aiding the shift toward a more plant-inclusive diet. Research indicates that while vegetarian and vegan consumers will accept plant-based meat alternatives that lack meat-like sensory properties, omnivorous and flexitarian consumers prefer alternatives that resemble animal-based protein because the taste and nutrition quality of soy protein is superior to that of other plant proteins and relatively similar to that of animal proteins.⁵⁻⁹ Furthermore, plant-based meat and dairy alternatives are often fortified with nutrients that are sometimes consumed in inadequate amounts, especially by adherents of plant-based diets. For example, 50 plant-based burgers recently analyzed by one research group received, on average, a Health Star rating of 3.9, versus a rating of only 2.9 for a meat burger. The plant-based burgers received higher Health Star ratings even though the entire new generation of plant-based burgers is classified as ultra-processed, as are 90% of all plant milks, by NOVA.

According to the amendment, it's apparent that the warning symbols are intended for inclusion on products that would be considered "processed" or "ultra-processed" under the NOVA

classification system. The advent in 2009 of NOVA has led to increased focus on the effect of processing on the nutritional attributes of foods. However, the extent to which a food is processed does not in and of itself accurately portray the nutritional contribution that food can make to the diet. In many cases, foods classified by NOVA as ultra-processed are rated quite highly by other nutrient profiling models as indicated in the chart below.¹⁰

Food Classification	12 plant-based meat and dairy alternatives	Classification Scale
NOVA	12 of 12 were classified as Ultraprocessed – Level 4	(1) unprocessed and minimally processed foods (2) processed culinary ingredients (3) processed foods (4) ultra-processed foods
Food Compass	3 of 12 received scores of at least 70 out of 100	the consumption of foods with scores of ≥ 70 is to be encouraged, 100 score is best score
Health Star <i>Voluntary in Australia and New Zealand</i> ⁹	5 of 12 received at least 4 stars	1-5 stars with 5 being the highest and best score
Nutri-Score <i>Voluntary in European Union</i> ⁹	9 of 12 received A or B	A-E, with A being the highest and best score

In summary, using NOVA as a basis for rating foods does a disservice to the consumer because food processing is but one factor among many that influences the nutritional qualities of a food. Finally, not all NOVA-classified ultraprocessed foods have the same nutrient value, and grouping soy protein isolate under the ultra-processed definition is unjustifiable from a nutritional and health perspective.

We appreciate the opportunity to provide comments. Should you have any questions about this letter, please contact me.

Sincerely,
Julie Ohmen
Chief Executive Officer
SNI Global

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