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Dockets Management Staff (HFA-305)

U.S. Food and Drug Administration

5630 Fishers Lane, Rm. 1061

Rockville, MD 20852

Comment on Ultra-Processed Foods; Request for Information (Docket No. FDA-2025-N-1793)

We, the undersigned public health and nutrition advocacy organizations, researchers, and individuals, applaud the federal effort to define “ultra-processed foods” (UPF) for regulatory purposes. Many of us are submitting more detailed comments on this Request for Information. The purpose of this brief comment is to communicate the following key points on which we all agree:

1. The evidence base is more than sufficient for regulatory action on UPFs that are harmful to health.
2. A new regulatory definition will lay the groundwork for policies that could comprehensively improve diet quality and related health outcomes.
3. The policy goal of developing a new definition should be to identify the subset of processed foods that scientific evidence research (conducted by those without financial or personal links to the food industry) shows are clearly linked to health concerns so that government policies can assist people with limiting those foods in their diets and making healthier food choices.
4. A definition for policy purposes should employ elements of the Nova framework. Ingredients and nutrient composition (e.g., energy density and high sodium, added sugar, and saturated fat content) are also important components to consider in policymaking.
5. UPFs should not be defined solely by the presence of a handful of ingredients, as many states have done (e.g., the presence of synthetic dyes should not be the only criteria used to identify a UPF).

Sincerely,

Academy of Nutrition & Dietetics

Adrian Dominican Sisters

Advocates for Better Children's Diets

Bon Secours Mercy Health

Center for Biological Diversity

Center for Environmental Health

Center for Food Safety

Center for Science in the Public Interest

Chef Ann Foundation

Coalition for Healthy School Foods

Common Threads

Consumer Reports
Daughters of Charity, Province of St. Louise
Food & Water Watch
Food Revolution Network
Global Health Advocacy Incubator
Healthy Eating Lifestyle Plan
Healthy Food America
Interfaith Center on Corporate Responsibility
Life Time Foundation
Louisiana Food Policy Council
Mercy Investment Services
National Association for Health and Fitness
National Education Association
Partnership for a Healthier America
Public Health Law Center
Reality Meets Science Inc.
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