

October 23, 2025

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 Food
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.
ScratchWorks
Sisters of St. Francis of Philadelphia
The Non-UPF Program
UConn Rudd Center for Food Policy and Health
Wellness in the Schools

Individuals:

Cheryl Bacchi
Public High School Teacher

Sarah Ball
Director of Dietetics Training
University of Michigan, Nutritional Sciences

Tom Baranowski
Distinguished Emeritus Professor
Baylor College of Medicine

Faith Boninger
Assistant Research Professor
University of Colorado Boulder

Kelly Brownell
Dean Emeritus, Sanford School of Public Policy

Duke University

Carlos A. Camargo
Professor
Harvard University

Clara Contreras
Advanced Certified Prevention Specialist, Private Consultant, Educational Prevention Trainer

Aline D'Angelo Campos
Postdoctoral Scholar
University of North Carolina at Chapel Hill

Hadis Dastgerdizad
Assistant Professor
University of Miami

Jennifer Falbe
Associate Professor
University of California, Davis

Nadia Flexner
Associate Director of Research
Global Health Advocacy Incubator

Anne Froment
Clinical Research Manager
University of North Carolina at Chapel Hill

Ashley Gearhardt
Professor of Psychology
University of Michigan

Andrea M. Gil
PhD Student
University of California, Davis

Nori Grossman
Nutritionist

Christina Hecht
Senior Policy Advisor
Nutrition Policy Institute, University of California Agriculture & Natural Resources

Ken Hecht
Director of Policy
Nutrition Policy Institute, University of California Agriculture & Natural Resources

Yuru Huang
Assistant Professor
University of Tennessee Health Science Center
Lucia Kaiser
Emeritus Extension Specialist
University of California, Davis

Allison Karpyn
Professor, Director
Center for Research in Education

Jim Krieger
Executive Director
Healthy Food America

Erica LaFata
Research Scientist
Oregon Research Institute

Danielle Lee
Director of Communications and Research Engagement
Nutrition Policy Institute, University of California Agriculture & Natural Resources

Lisa Lefferts
Environmental Health Consultant

Brittany Lemmon
PhD Candidate
University of California, Davis

JoAnn E. Manson
Professor of Medicine
Brigham and Women's Hospital/Harvard University

Alejandra Marquez
Research Associate
University of California, Davis

William J. McCarthy
Adjunct Professor Emeritus
UCLA Fielding School of Public Health

Eli Moraru
President
The Community Grocer

Marion Nestle
Professor Emerita
New York University

Shu Wen Ng
Professor
University of North Carolina at Chapel Hill

Melissa Olfert
Professor
West Virginia University

Anisha I. Patel
Professor, Pediatrics
Stanford University

Michele Polacsek
Professor
University of New England

John D. Potter
Professor Emeritus
University of Washington

Andrea Pedroza-Tobias
Postdoctoral Scholar
Stanford University

Lorrene Ritchie
CE Specialist Emeritus and Former Director
Nutrition Policy Institute, University of California Agriculture & Natural Resources

Jennifer Sacheck
Professor
Brown University School of Public Health

Laura A. Schmidt
Professor
University of California at San Francisco

Liana Schreiber
Research Scientist

Lynn Silver
Director, Prevention Policy Group
Public Health Institute

Lindsey Smith Taillie
Professor
University of North Carolina, Chapel Hill

Anastasia Snelling
Professor
American University

Mary Story
Professor
Duke University

Elizabeth Taylor Quilliam
Associate Professor (retired)
Michigan State University

Alexandria E. Reimold
Postdoctoral Scholar
University of California, Davis

Hannah R. Thompson
Director
Nutrition Policy Institute, University of California Agriculture & Natural Resources

Rebecca Tryon
Manager, Healthy Communities Initiative
Yolo County Public Health

Virginia Uhley
Associate Professor
OUWB School of Medicine

Alexander C. Wagenaar
Research Professor
Emory University Rollins School of Public Health

Ethan Wolf
PhD Student
University of California, Berkeley

Lisa Young
Adjunct Professor of Nutrition
New York University