



May 16, 2022

Janet M. de Jesus, MS, RD  
Office of Disease Prevention and Health Promotion  
Office of the Assistant Secretary  
Department of Health and Human Services  
1101 Wootton Parkway, Suite 420  
Rockville, Maryland 20852

RE: Request for Comments on Scientific Questions to Be Examined to Support the Development of the Dietary Guidelines for Americans, 2025-2030 (Docket No. HHS-OASH-2022-0005-0001)

Dear Ms. de Jesus,

The Institute of Food Technologists (IFT) appreciates the opportunity to provide input regarding scientific questions that will inform the development of the Dietary Guidelines for Americans (DGA), 2025 – 2030. IFT is a global organization of approximately 12,000 members who are committed to advancing the science of food. We believe science is essential to ensure the global food system is equitable, sustainable, safe, and nutritious.

This comment pertains to the proposed scientific question: “What is the relationship between consumption of dietary patterns with varying amounts of ultra-processed foods and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?” This comment directly considers the criteria outlined by the HHS and USDA for scientific questions of relevance, importance, impact to federal programs, and duplication.

**Relevance:** The inclusion of “ultra-processed” foods is understandable given interest from consumers, public health researchers, and the previous Dietary Guidelines Advisory Committee (DGAC). There will be many opinions around the relevance of this highly visible topic. We firmly believe science must lead the consideration. As such, it is imperative to note there is no established, scientific consensus definition of “ultra-processed” and varying definitions are used in research. Most definitions do not directly consider a food’s nutritive value. “Ultra-processed” foods can include both ingredients with nutrients that need to be increased, such as whole grains, vitamins, and minerals in many enriched and fortified grain products, as well as those that need to be decreased, such as added sugar, sodium, and fat. While some “ultra-processed” foods are energy dense and should be limited in healthy dietary patterns, the limitation is due to their nutrient content and not degree of processing. If a scientific question including “ultra-processed” foods is included, a consensus-definition would be essential. Once defined, robust scientific data, beyond broad epidemiological studies would be vital. Until these are considered, classifying a dietary pattern based on how a food is made instead of the nutritional content does not have relevance within the DGA.

**Importance:** We agree food-based recommendations in dietary guidance should be easy to understand and consider the affordability, availability, accessibility, and safety of foods. Food processing has contributed to each of these considerations. For example, fortification and enrichment of grain-based foods has been considered a public health success preventing



deficiency diseases and neural tube defects. Aseptic and ultra-high temperature packaging technologies have minimized spoilage and increased shelf life while improving availability and accessibility of nutritious foods, such as milk. Recent technologies have created plant-based alternatives to animal products. All of these foods could be considered “ultra-processed” due to the ingredients added or processing technology that improves nutrition, extends shelf life, and enhances food safety.

**Potential Impact to Federal Programs:** Evaluation of dietary patterns based on how foods are made rather than nutritive value could have significant impacts on federal nutrition programs and create challenges in implementation, sustainability, and resiliency. For example, school lunch and breakfast programs include yogurt, ready-to-eat cereals, fortified milk, enriched whole grain breads, and many snacks meeting the SmartSnacks guidelines which could be considered “ultra-processed.”

Additionally, there are unintended consequences when classifying foods by processing that may limit innovation and advancement of science. For example, emerging food processing techniques to reduce toxic chemicals and metals in foods may be considered “ultra-processed” which could significantly hinder advancement of this technology. Further stigmatizing food processing and stifling potential solutions for current and future challenges, like the FDA Closer to Zero initiative.

**Duplication:** The concerning components of foods that may be considered “ultra-processed” are covered extensively in other sections of the dietary guidelines (e.g., added sugars, sodium, and saturated fat).

For this myriad of reasons, we suggest this question be reconsidered and instead focus on questions that help support a safe, nutritious, and equitable food system for the 2025-2030 DGA.

Regards,

A handwritten signature in black ink that reads 'Vickie L. Kloeris'.

Vickie Kloeris, MS, CFS  
IFT President, 2022-2023

A handwritten signature in black ink that reads 'Christie Tarantino-Dean'.

Christie Tarantino-Dean, FASAE, CAE  
IFT, Chief Executive Officer