



Institute of Food Technologists
525 W. Van Buren Street., Suite 1000
Chicago, IL 60607-3830 USA

+1.312.782.8424
+1.312.782.8348 Fax
ift.org

September 21, 2023

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: Comments for 2025 Dietary Guidelines Advisory Committee (Docket No. OASH-2022-0021)

Dear Ms. De Jesus,

The Institute of Food Technologists (IFT) appreciates the opportunity to provide these comments on the Committee's work and scientific questions. 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.

IFT's comments pertain 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."

IFT firmly believes science must lead the consideration of the topic and as such, we ask the committee to consider that there is no established scientific definition of "ultra-processed" and varying definitions are currently used in the literature. We also note that the draft protocol for the systematic review of this question does not include a definition for ultra-processed. To adequately review the science, it would seem necessary to establish a definition for "ultra-processed" foods.

We also ask the committee to consider that most definitions of ultra-processed do not consider a food's nutritive value since most definitions can include both foods with nutrients that need to be increased, such as whole grains, vitamins, and minerals in many enriched and fortified grain products, as well as nutrients and components that need to be decreased, such as added sugar, sodium, and saturated fat. While there are "ultra-processed" foods that are energy dense and nutrient poor and should be limited in dietary patterns, the limitation is due to their nutrient

content and energy density, not their degree of processing. As noted in the recent research by Hess, et al. in the Journal of Nutrition, an improvement in the healthy eating index score is possible, even when more than 80% of foods in the diet are considered ultra-processed by the NOVA classification. The components of concern that yielded a less than perfect HEI, namely sodium, is already covered extensively by other questions in the dietary guidelines.

We also encourage the committee to consider the benefits that food processing has brought to the affordability, availability, accessibility, and safety of foods. For example, many technologies help preserve food for longer and improve shelf life, which minimizes food waste, is more affordable for consumers since they waste less, and ensures food and nutrition security when fresh foods may not be available or accessible. Additionally, modern technologies that are creating plant-based alternatives to many animal foods could be considered “ultra-processed”, yet have been shown to positively impact health and serve an important role in the diets of those with specialized diets or allergies.

IFT commends the DGAC on the work they have already achieved, and we thank you for considering our comments on this critical public health initiative.

Sincerely,

Anna Rosales
Senior Director Nutrition and Government Affairs
Institute of Food Technologists