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IFT Oral Comments on the DGAC Final Scientific Report 2025

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Good afternoon,

I'm Anna Rosales, Registered dietitian and Senior Director of Nutrition & Government affairs at the Institute of Food Technologists.

The Institute of Food Technologists appreciates the opportunity to provide oral comments on the Committee's work and final report. IFT is a global organization of approximately 11,000 members committed to advancing the science of food. We believe that science is essential to ensuring that the global food system is equitable, sustainable, safe, and nutritious.

First, we would like to acknowledge the Dietary Guidelines Advisory Committee and the HHS and USDA staff for their successful completion of the thorough review of scientific evidence used to develop the Dietary Guidelines for Americans, 2025-2030 and bringing forward new considerations in several areas including behavior, protein, ultra-processed foods and health equity.

We support the committee's findings regarding the limited evidence for dietary patterns with ultra-processed foods and their impact on growth, body composition, and the risk of obesity. The committee accurately noted the inconsistencies in definitions and the current limitations of dietary assessment methods in evaluating the type of processing applied to foods. As the Committee noted, many foods categorized as ultra-processed are higher in saturated fat, sodium, and added sugars, which are already covered within the dietary guidelines. There continues to be no clear evidence for the health impact of 3 of the 4 criteria of UPF, specifically the processing method, whether a food is produced commercially or in home and the number of ingredients or specific additives. However, there are many foods, such as yogurts, whole grain breads and cereals, packaged fruits and vegetables, plant-based meats, and dairy alternatives, that could be low in saturated fats and added sugars and fit into a healthy dietary pattern, yet would be considered ultra-processed by several definitions. We agree that additional research is needed on this topic and should continue in the pattern of recent research that has demonstrated not all ultra-processed foods are associated with adverse health outcomes. This indicates a need for a more nuanced research approach to avoid restrictions on foods that could help people achieve a healthy diet.

We also noted that the committee recommended the inclusion of other expertise in behavioral, communication, and implementation science on future dietary guidelines advisory committees to assist in the development of strategies for implementing the Dietary Guidelines in federal food programs and other eating environments. We support this recommendation and suggest that food science expertise should also be included to help understand the implications of changing recommendations on the food supply and the development of healthy foods in the market.

We thank you for the opportunity to provide these comments.