

October 23, 2025

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Office of Nutrition and Food Labeling
Human Foods Program, Food & Drug Administration
US Department of Health & Human Services
5001 Campus Drive
College Park, Maryland 20740

Eve Stooddy, PhD
Food and Nutrition Service
US Department of Agriculture
1320 Braddock Place
Alexandria, Virginia 22314

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

Dear Drs. Kavanaugh & Stooddy:

On behalf of the [International Fresh Produce Association](https://www.freshproduce.org/) (IFPA), the largest and most diverse association serving the full fresh produce and floral supply chain, we respectfully submit the following comments to the Request for Information (RFI) from the United States Departments of Agriculture and Health and Human Services (the Departments) to develop a definition for ultra-processed foods (UPFs) for human food products in the U.S. food supply. IFPA, its legacy organizations, and its members bring a history of leadership in federal nutrition initiatives. A central focus of IFPA's work is advancing fruit and vegetable consumption through evidence-based federal policy and programs.

Due to many questions outlined in the RFI not being specific to fresh fruits and vegetables, our comments focus on the opportunity to improve nutrition quality of all foods available to consumers, the importance of fruit and vegetable consumption in meeting nutrient needs and improving health outcomes, and the need to explicitly ensure that raw fruits and vegetables are not unintentionally considered ultra-processed foods due to light processing techniques that do not alter the nutrition of produce.

Support for Defining Ultra-processed Foods (UPFs)

IFPA supports the efforts of the Departments to improve the American diet, including addressing the prevalence of ultra-processed foods (UPFs). We know that poor diet quality presents a higher risk of nutrition-related chronic conditions like obesity, cardiovascular disease, diabetes, and certain cancers – which collectively impact the majority of Americans. At the same time, the consumption of UPFs has increased over the last 20 years, growing from 53.5% of calories in 2001-2002 to 57% of calories in 2017-2018.ⁱ A study released in 2025 estimated 70% of foods available in grocery retail could be considered UPFs.ⁱⁱ Yet, dietary guidance indicates that fruits and vegetables alone should make up approximately 50% of the diet. Only one in ten Americans meet this target.

Fruits and vegetables have been a staple of federal dietary guidance since the inception of the Dietary Guidelines for Americans (DGA) in 1980. Today's version of the food pyramid - MyPlate - depicts fruits and vegetables as half of the plate.ⁱⁱⁱ In the recently released Make America Healthy Again strategy, the importance of fruit and vegetable consumption was reiterated, including a commitment to launch an education campaign that prioritizes whole foods including fruits and vegetables.^{iv}

The reality is that despite the long-time dietary guidance and promotion of fruits and vegetables, only 1 in 10 US adults consume enough fruits and vegetables according to the Centers for Disease Control and Prevention (CDC).^v A staggering 6 in 10 adults have a chronic condition, and 4 in 10 have more than one, many of which are nutrition related, like heart disease, stroke, diabetes, and some cancers.^{vi} Children are also failing to meet fruit and vegetable consumption recommendations. Amongst children, almost one-third did not consume a daily fruit and almost half did not consume a daily vegetable in the week prior to surveys conducted with parents and caregivers in 2021.^{vii} Improving dietary quality of Americans will take a comprehensive approach of significantly increasing fruit and vegetable consumption and improving the dietary quality of foods available.

In 2024, investigators at the National Cancer Institute examined UPF intake and mortality through the National Institutes of Health (NIH)-AARP Diet and Health Study.^{viii} The study population included more than 540,000 adults aged 50 to 71 years old. Using the NOVA classification system, the researchers utilized two methods to classify foods. Those who consumed more UPFs had worse diet quality as indicated by the Healthy Eating Index (HEI) score. In addition, UPF intake was associated with a higher risk of all-cause mortality, heart disease mortality, and diabetes-specific mortality.^{ix}

In addition to the negative impacts that UPFs have on physical health, researchers have also examined their impact on mental health. A systematic review and meta-analysis published in 2022 found evidence for associations between UPF consumption and adverse mental health, specifically symptoms of anxiety and depression.^x Another study published in 2023 compared adults with low UPF consumption to those with high UPF consumption. Not only did the authors find that participants with high UPF intake had an increased prevalence of comorbidities like diabetes, dyslipidemia, and hypertension, they also found that they had an increased risk of depression.^{xi}

While many of the studies examining UPF focus on adults, a study published in 2024 examined UPF consumption and cardiometabolic risk factors in children. The study included 1,426 children aged 3-6 years and found that higher consumption of UPF was positively associated with waist circumference, fat mass index, and fasting plasma glucose, highlighting the association with adiposity and other cardiometabolic risk factors.^{xii} This is especially concerning given that, in 2025, the global prevalence of obesity among school-age children and adolescents surpassed underweight for the first time. This shows that poor nutrition is not only impacting children in the US, but around the world.^{xiii}

Defining Processing – Question 3

Classification systems like NOVA place raw fruits and vegetables in Group 1 (unprocessed or minimally processed). In its recent update to the definition of “healthy”, FDA rightly recognized all raw fruits and vegetables and tree nuts, including those cut and peeled, as meeting the threshold. Yet, some recent state-level definitions of ultra-processed foods have categorized certain produce as ultra-processed – based solely on the minimal processing required to maintain product quality. For example, the original draft of California UPF bill (AB1264) included foods that have undergone any level of “processing” or contains any added substances by federal reference, regardless of the purpose or degree of transformation. This included fruits or vegetables that use washes or surface finishing agents such as carnauba wax. This wax is used on fruits and vegetables to reduce water loss, prolong freshness, extend shelf life, and visually appeal to consumers. Although the language in AB1264 was ultimately amended (and endorsed by California-based fresh produce

stakeholders), this serves as a clear example of how policies that are not based on nutritional value, can lead to unintended consequences including misclassifying healthy options like fruits and vegetables.

We urge the Departments to keep in mind that convenience and perishability are two common barriers cited related to the underconsumption of fruits and vegetables. Value-added fruits and vegetables, like bagged lettuce, baby carrots and sliced apples, and others, should not be classified as processed simply because they undergo minimal handling that can improve fruit and vegetable consumption. Such misclassification based on any level of processing could inadvertently restrict access to nutrient-dense produce and undermine dietary guidance. We ask that in any effort to define ultra-processed foods, the Departments explicitly exempt raw fruits, vegetables and tree nuts from the definition.

Importance of Promoting Fruit & Vegetable Consumption

A diet rich in fruits and vegetables has been found to lower blood pressure and reduce or prevent the risk of chronic conditions like cardiovascular disease or stroke, certain types of cancer, type 2 diabetes, and more, yet Americans are woefully under consuming these nutrient dense foods, even when they are aware of the health benefits.

As such, we appreciate the Departments efforts to address the totality of the American diet. We also strongly encourage a specific emphasis on increasing fruit and vegetable consumption. In addition to addressing UPFs, the efforts of the Departments, and other activities carried out by the Human Foods Program, should support evidence-based programs and policies that result in increased access and consumption of fruits and vegetables.

Produce prescription programs across the country have demonstrated the benefits of consuming more fruits and vegetables for those who have - or are at risk of developing - a nutrition-related chronic condition. A review of the literature on food prescriptions, including produce prescriptions, examined 30 research articles and found that the programs decreased participants' BMI, waist circumference, blood pressure, and HbA1c.^{xiv} An evaluation of a healthy food box program which included fruits and vegetables and was tailored to participants with diabetes found that the program significantly decreased HbA1c and food insecurity, and significantly increased daily fruit and vegetable consumption.^{xv} Furthermore, the programs decreased emergency department utilization, reduced inpatient hospitalizations and decreased healthcare spending per participant with longer participation in the programs resulting in greater reductions in direct healthcare spending^{xvi}. We encourage HHS to make produce interventions a standard practice of clinical care in federal health programs.

Improved labeling of food and beverage products also provide an opportunity for FDA to promote the consumption of healthy, nutritious foods like fruits and vegetables. Clear, transparent food labeling systems, like a mandatory interpretive front-of-package nutrition labeling (FOPNL) system may help achieve this. A meta-analysis published in 2020 found that food labeling interventions not only led to a decrease in total energy intake and total fat but also increased vegetable consumption by 13.5%.^{xvii} Improved labeling efforts like FOPNL can help encourage fruit and vegetable intake by increasing nutrition education and awareness and discouraging the purchase and consumption of foods high in fat, sodium, and added sugars. IFPA appreciates FDA's continued commitment to improve labeling as outlined in our [comments](#) submitted to the agency in July 2025 on the proposed rule regarding front-of-package nutrition information.

While we encourage FDA to move forward with efforts to finalize the proposed front of pack labeling rule, the agency should go further on fruit and vegetable disclosures. Specifically, we ask that FDA strengthen labeling requirements around declarations on items that make fruit and vegetable claims in name or imaging but do not contain a “meaningful amount” of fruits or vegetables. A “meaningful amount” should only apply to fruits and vegetables in forms consistent with the 2020-2025 Dietary Guidelines for Americans recommendations to consume “mostly whole” fruits and vegetables, which includes value-added produce. A systematic review published earlier this year assessed how front-of-package marketing, specifically claims, fruit imagery, and ingredient disclosures, affects consumer perceptions, purchase intentions, and behavior regarding fruit drinks (which are the top source of added sugars in young children’s diets), especially those marketed to children.^{xxviii} The researchers found that claims and fruit imagery often mislead consumers – especially parents – into overestimating nutritional value and juice content. While ingredient disclosures, like percent juice and added sugars, can help correct misperceptions, they’re inconsistently applied and often overshadowed by marketing tactics. The authors call for stronger labeling regulations to support informed choices and reduce deceptive marketing practices, particularly for beverages marketed to children.

In terms of USDA programs - research has consistently shown that nutrition incentive programs within the Supplemental Nutrition Assistance Program (SNAP) effectively increase fruit and vegetable consumption among low-income populations. Evaluations of initiatives like the Healthy Incentives Pilot and nutrition incentive programs implemented through the Gus Schumacher Nutrition Incentive Program (GusNIP) demonstrate that financial incentives, such as rebates or supplemental produce funds, lead to measurable improvements in dietary quality, food security, and purchasing behavior.^{xix xx} The Departments should ensure any effort to improve dietary quality in SNAP includes specific interventions that can increase access and consumption of fruits and vegetables.

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) has also had measurable, positive impact on increasing the consumption of fruits and vegetables for vulnerable populations like pregnant women and young children through the program’s Cash Value Benefit (CVB), as recognized the MAHA Commission’s first report. The CVB was permanently increased in 2024 for all participants to allow families to access more fruits and vegetables. Research has found that the increased amounts led to families purchasing more varieties of fruits and vegetables^{xxi}, improved participant program satisfaction and retention^{xxii}, increased fruit and vegetable purchases^{xxiii}, and most importantly, increased consumption of fruits and vegetables by an average of ¼ cup per day per child, which is statistically significant^{xxiv}. Any efforts to reduce the fruit and vegetable benefit in the WIC program will undermine goals to improve dietary quality among children.

School nutrition programs also play a critical role in promoting fruit and vegetable consumption by including produce into daily meals and aligning offerings with federal dietary guidelines. Research found that when the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 was passed, which required meals to serve a daily fruit and wide variety of vegetables, foods of poor nutritional quality consumed at schools decreased from 55% to 24%.^{xxv} Since the implementation of HHFKA, school meals have resulted in better diet quality, reduced obesity risk, and lower rates of food insecurity.^{xxvi xxvii}

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Another school-based program that promotes the consumption of fruits and vegetables is the Fresh Fruit & Vegetable Program (FFVP). FFVP has proven to be a cost-effective strategy for improving children's dietary habits and health outcomes. An evaluation of the program found that students in FFVP schools consume an additional one-third cup of fruits and vegetables daily compared to their peers in nonparticipating schools, with no increase in overall energy intake. It also found that the program led to a 3% reduction in childhood obesity rates at a fraction of the cost of other childhood obesity interventions, and participating schools reported less plate waste – indicating both improved consumption and program efficiency.^{xxix} The Departments should explore options to make FFVP available to more students.

This RFI and other efforts of the Departments present an unprecedented opportunity to fully leverage federal nutrition programs and policies as vehicles for advancing public health and reducing nutrition-related chronic disease. In addition to labeling policy which impacts nearly every consumer, programs like SNAP, WIC, produce prescriptions, and school meals reach millions of Americans daily, offering a powerful platform to reinforce dietary guidelines and make the healthy choice the easy choice. By aligning the efforts with evidence-based nutrition strategies, the Departments can ensure that nutrition programs fulfill their core mission to nourish Americans and promote public health.

Conclusion

IFPA commends the Administration for its efforts to improve public health and nutrition in the United States. We have previously shared our [policy recommendations](#) for Making America Healthy Again, engaged in the Dietary Guidelines for Americans development process, and advocated for nutrition policies and programs that will increase fruit and vegetable consumption. As the Administration continues to work on food and nutrition priorities, we encourage continued robust stakeholder engagement where fruits and vegetables are central to rulemaking and legislative priorities. These foods are foundational to public health and nutrition, agricultural producers, and our economy. Elevating their role in federal programs, regulations, and dietary guidance not only aligns with science-based recommendations but ensures access to the most nutrient-dense components of the food supply. Simply put, we will not achieve our mutual goal to improve the nation's diet without Americans increasing their fruit and vegetable consumption.

We appreciate the Administration's leadership and are grateful for the opportunity to engage with the Departments in shaping nutrition programs and policies that prioritize making fresh fruits and vegetables a staple of every American's diet.

Sincerely,

A handwritten signature in blue ink that reads "Mollie Van Lieu".

Mollie Van Lieu
Vice President, Nutrition and Health
International Fresh Produce Association

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