

Re: Ultra-Processed Foods; Request for Information

Agency / Docket number: FDA-2025-N-1793

Defining ultra processed foods as foods containing ultra-processed ingredients.

Ultra-processed ingredients (UPIs) could be defined as ingredients that have been isolated from a whole plant source, or a plant or animal derived ingredient that has been excessively treated beyond normal cooking, mixing, fermenting and drying.

Plant UPI examples: starches, sugars, flours, dietary fibers, vital wheat gluten, high fructose corn syrup, maltodextrins.....

Animal food examples: processed meats such as sausage fillings, processed cheese, ultra pasteurized milk.....

By recognizing ultra-processed ingredients (UPIs) it becomes possible to understand why foods (UPFs) containing these ultra-processed ingredients might be harmful. Ingredients (UPIs) can be readily studied in isolation to discover whether there has been harmful oxidation, or conversion to harmful by-products during their production. However, the harm can also result from a lack of accompanying factors that would have been present in the original whole plant or animal derived food.

Refined digestible carbohydrates that have been isolated from the original source, usually a whole grain, provide an example of harmfulness that is due to a lack of accompanying factors. Thus, refined flour in the context of the whole grain from which it came, is not harmful. This is an observation frequently mentioned by millers and bakers, that refined flour is not itself harmful. However, there is more to consider. It was discovered by the 1940s that refined flour cannot be properly metabolized by humans without the B-vitamins that would be present if the whole grain was eaten. In the absence of sufficient B-vitamins digestible carbohydrates are only partially converted to energy and instead result in fat deposits. Having learned this, most millers have been enriching their refined flour with the necessary B-vitamins since the 1940s.

Incidentally the importance of the enrichment of refined flour has generally been ignored since the early 1990s. By now in 2025 organic refined flour is not always enriched. In consequence we have outright rejection of wheat products as being harmful, presumably by those people who relied on the non-enriched refined wheat flour at the base of their diet. Nor are the various digestible carbohydrate derivatives from grains such as corn syrup enriched or formulated with accompanying B-vitamins to ensure their proper metabolism.

By now in 2025, refined digestible carbohydrates as an example UPI in the absence of essential whole plant food factors, can be singled out to be specifically known to increase the risk of metabolic disease; obesity, type-2 diabetes, cardiovascular disease, colon cancer, and neurological disorders. The missing whole plant components that would make these refined digestible carbohydrates safe and beneficial are vitamins, minerals, dietary fiber and phytochemicals such as the polyphenolics and other vital components yet to be recognized.