ADA American Dental Association®
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October 20, 2025

Dockets Management Staff (HFA–305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. FDA-2025-N-1793—Ultra-Processed Foods; Request for Information

To Whom It May Concern:

As the leading authority on oral health in the United States, the American Dental Association (ADA)—representing more than 159,000 dentists nationwide, writes to urge the Food and Drug Administration (FDA) and the U.S. Department of Agriculture (USDA) to incorporate added sugar explicitly into any definition of ultra-processed foods (UPFs). We offer these comments in response to the *Federal Register* notice of July 25, 2025 (90 FR 35305).

**ADA Perspective on UPFs**
FDA and USDA have requested information to help define a uniform definition of UPFs. While the ADA's expertise lies primarily in oral health and sugar consumption, we note that many of the systems under consideration (such as the NOVA classification system) already link high added sugar content with UPFs. We therefore urge the agencies to ensure that added sugars remain a core element of any adopted definition.

The ADA has broadly defined "ultra-processed foods" as "industrial creations reformulated with little if any whole foods, often additives, and containing large amounts of added sugar and salt."[1] This broad definition highlights that these foods almost always contain high fructose corn syrup and other forms of added sugar, often in high amounts, even in foods that are not typically considered sweet.[2,3]

**Oral Health Risks of Added Sugar**
From a dental perspective, there is no threshold of sugar intake that is risk-free for dental decay. Sugar increases the build-up of plaque (a sticky, colorless, bacterial film), which weakens enamel and can potentially form a cavity. This applies regardless of whether the sugar is naturally present or added artificially.[4]

The ADA's policy positions are grounded in the scientific consensus that excess sugar consumption is a primary contributor to dental caries (tooth decay), the most common chronic disease in both children and adults. Unfortunately, the average American consumes approximately 17 teaspoons (68 grams) of added sugar per day. This is significantly higher than the recommended daily limit of 10 teaspoons (40 grams) for women and 12 teaspoons (48 grams) for men.[5]

Added sugar intake has decreased slightly over time; however, it still remains high, with younger adults consuming more than older adults.[6]

**Health Policy Alignment & Practical Considerations**
FDA's request emphasizes links between UPFs and chronic diseases. Oral disease should be included in this framework, as dental caries are the most prevalent chronic disease in the U.S. Addressing added sugar in UPFs would therefore advance both systemic and oral health goals, ensuring consistency across federal nutrition and health policy.

The ADA recognizes that not all processed foods will meet the ADA's definition of "ultra-processed" and that sugar cannot be completely eliminated from the diet. However, it is both practical and necessary to:

- Encourage healthier eating patterns,
- Limit consumption of high fructose corn syrup and other added sugars, and
- Ensure that added sugar is clearly addressed in any regulatory framework for UPFs.

**Recommendation**
The ADA commends the FDA and USDA a uniform definition of "ultra-processed foods." Based on the near-universal presence of added sugars in these foods, we strongly recommend that any final definition explicitly incorporate added sugar as a defining attribute. Doing so will strengthen the scientific foundation of the definition and support both oral and overall health.

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Thank you for providing the opportunity to comment. If you have any questions or would like to discuss further, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org.

Sincerely,

/s/

Brett Kessler, D.D.S.
President

/s/

Elizabeth Shapiro, D.D.S., J.D., C.A.E.
Interim Executive Director

BHK:EAS:rjb

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[1] American Dental Association, Policies and Recommendations on Diet and Nutrition, 2024.

[2] Mayo Clinic, "Key ingredients to avoid in ultra processed foods," June 4, 2024. https://mcpress.mayoclinic.org/nutrition-fitness/key-ingredients-to-avoid-in-ultra-processed-foods/

[3] Cleveland Clinic, "What Ultra-Processed Foods Are (and Why They're So Bad for You)," March 23, 2023. https://health.clevelandclinic.org/ultra-processed-foods

[4] Touger-Decker R, van Loveren C. Sugars and dental caries. *Am J Clin Nutr*. 2003 Oct;78(4):881S-892S. doi: 10.1093/ajcn/78.4.881S. PMID: 14522753.

[5] Centers for Disease Control and Prevention, "Get the Facts: Added Sugars." https://www.cdc.gov/nutrition/php/data-research/added-sugars.html. Accessed July 9, 2025.

[6] DiFrancesco L, Fulgoni VL 3rd, Gaine PC, Scott MO, Ricciuto L. Trends in added sugars intake and sources among U.S. adults using the National Health and Nutrition Examination Survey (NHANES) 2001-2018. *Front Nutr*. 2022 Aug 18;9:897952. doi: 10.3389/fnut.2022.897952. PMID: 36061886; PMCID: PMC9434277.