August 28, 2025

Submitted Electronically via Regulations.gov

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

Re: REQUEST FOR EXTENSION OF COMMENT PERIOD: Ultra-Processed Foods; Request for Information, FDA Docket No. FDA-2025-N-1793

To Whom It May Concern:

The undersigned members of the Food and Beverage Issue Alliance (FBIA), a coalition of food and beverage trade associations, respectfully request that the Food and Drug Administration (FDA) and the U.S. Department of Agriculture (USDA) (the "agencies") grant an extension on the comment period for the agencies' request for information (RFI) entitled: "Ultra-Processed Foods; Request for Information." In particular, we request that FDA and USDA extend the comment period by 60 days to allow a meaningful opportunity to comment.

The undersigned members of FBIA appreciate the opportunity to provide comments on FDA and USDA's request for information. The RFI raises more than a dozen complex questions about nutrition, processing, food formulation, and technical issues that are of great importance to food and beverage manufacturers, as well as the American public. The study of "ultra-processed foods" ("UPFs") is an evolving endeavor for which it could take decades to reach scientific consensus. As such, it will take significant time for us to fully analyze the questions posed in the RFI and compile thorough responses and information that will be of value to the agencies in its request.

Given the significance for numerous stakeholders of this request, we believe FDA, USDA and the public would be best served by the submission of detailed information that thoroughly addresses the scientific and regulatory questions posed. Accordingly, we hereby request a 60-day extension of the comment period.

Please do not hesitate to contact us if you have any questions regarding this request. Thank you for your consideration.

Sincerely,

- 1. American Bakers Association
- 2. American Frozen Food Institute
- 3. American Herbal Products Association
- 4. American Peanut Shellers Association
- 5. American Spice Trade Association
- 6. The Association for Dressings & Sauces
- 7. Calorie Control Council

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¹ 90 Fed. Reg. 35305 (July 25, 2025).

- 8. Corn Refiners Association
- 9. Edible Oil Producers Association
- 10. FMI The Food Industry Association
- 11. Independent Bakers Association
- 12. International Dairy Foods Association
- 13. International Food Additives Council
- 14. Juice Products Association
- 15. National Association of Convenience Stores
- 16. National Automatic Merchandising Association
- 17. National Fisheries Institute
- 18. National Pasta Association
- 19. National Seasoning Manufacturers Association
- 20. Refrigerated Foods Association
- 21. The Sugar Association