October 6, 2025

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

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

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to comment on the Food and Drug Administration's (FDA) Request for Information (RFI) regarding the definition of "ultra-processed foods". With over 690,000 members, TFBF is the largest general farm organization in Tennessee, representing commodity producers of all types across the state. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on various issues related to agriculture and rural living. On behalf of our member farmers, we look forward to providing an agricultural perspective about the importance of processing food products for safe delivery from the farm to the consumer.

America's food supply is the safest, highest quality, most abundant, and most affordable in the world. Farmers recognize a safe food supply is important to the integrity of the agricultural industry but most importantly to the well-being and health of the consumer. With changing technology, the process of maintaining a safe product from the field to the table can always be improved. Policies and procedures which build trust and reliability in agriculture should reflect the latest in technology and research. Regulatory oversight should not impede farmers' ability to produce their crops and livestock. The risks versus the benefits should be considered in any food safety legislation or regulatory proposals. Consumers need to be aware and FDA must recognize that reasonable regulations which are beneficial to producers also benefit an abundant, safe, and dependable food supply.

Food products of all kinds undergo processes to aid in growing, harvesting, storage, flavoring, shipping, and preservation stages to safely, effectively, and efficiently deliver perishable products to consumers all over the world. These processes make food safe for consumption, improve the quality of the food, decrease waste, and increase convenience for consumers. Without the ability to process fresh, whole food, the global food supply chain would not exist. We urge FDA to recognize the unintended

147 Bear Creek Pike, Columbia, TN 38401 • P.O. Box 313, Columbia, TN 38402-0313 • Phone 931-388-7872 • Fax 931-388-5818

consequences of an overly inclusive definition of “ultra-processed foods” which may negatively impact whole foods that undergo physical, biological, or chemical processes to be safely consumed and consider all potential examples of this. These include but are not limited to:

- Plant breeding: Like animals, plants can be selectively bred to optimize certain traits for increased yield and durability (i.e., drought tolerance, disease resistance, pest resistance, stalk height, faster growth rates, climate adaptability, pesticide resistance, etc.). This should not be included as a biological change in the definition of “ultra-processed”.
- Farm inputs: Farmers rely on numerous inputs to aid in the efficient production of food products, including fertilizer, pesticides, animal health tools like vaccines, antibiotics, and dewormers. Agricultural production practices like these and others should not qualify as biological or chemical processes as referenced in questions 3(b), 3(c), and 3(d) in the RFI.
- Harvesting: The harvesting of field crops often requires the physical nature of the product to change (i.e., when corn is harvested, it is removed from the cob). These practices should not be included when considering physical changes to a food product to deem it “ultra-processed”.
- Milk and other dairy products: To maintain safety and top quality of the product, milk undergoes many processes to be consumed and/or used for other dairy products like cheese and yogurt. These processes are a necessity and should not be considered “ultra-processed”. Those steps include:
    - Refrigeration: After being collected from the cow, milk is cooled to a temperature of around 4°C (39°F) to prevent spoilage.
    - Separation: Milk is placed in a centrifuge to separate the cream from the milk.
    - Standardization: The milk is processed further to achieve the desired fat content (i.e., whole, 2%, or skim).
    - Pasteurization: To kill harmful bacteria, milk is heated to around 72°C (161°F) for 15 seconds, called High Temperature Short Time (HTST). In some cases, milk is heated to even hotter temperatures to achieve longer shelf life.
    - Homogenization: By a process of sending the milk through tiny nozzles at a high pressure, fat is broken into very small droplets which prevents cream from separating when stored.
    - Fortification: Sometimes, milk is fortified with vitamins like Vitamin A and D for added nutritional benefit.
- Meat products: Before being cut into wholesale cuts or other protein products, beef, pork, lamb, chicken, turkey, and other animal protein sources are bled out, de-hided, eviscerated, trimmed, washed with hot water or organic acids, and

chilled. Meat not used for wholesale cuts is also combined and processed to make ground meat products. Protein products like bacon and sausage are smoked and/or seasoned with salt and additional flavorings.

- Products derived from grains: Grains such as corn, soybeans, wheat, barley, oats, and others undergo processing to create meals, oils, flours, cereals, and more. These products, which are otherwise inedible, become critical ingredients for whole food items (i.e. bread).
- Fruits and vegetables: Common processes for apples, tomatoes, and other fruits and vegetables include waxing for preservation, slicing, freezing, canning, and saucing.

On the other hand, “imitation” foods (lab-grown, cell-derived, and plant-based proteins and milks, for example) undergo significantly higher amounts of processing. FDA should assess these processes separately and should have different requirements to signify their differences from conventional agricultural products.

Food processing and handling is essential to ensure food safety. While reasonable regulation of the food supply helps maintain high safety standards and promotes consumer confidence, we must avoid negative and counterproductive regulations with unintended consequences to the economy. We implore FDA to differentiate those processes which are essential to the safety and longevity of food products.

Thank you for your consideration.

Sincerely,

Eric Mayberry
President
Tennessee Farm Bureau Federation