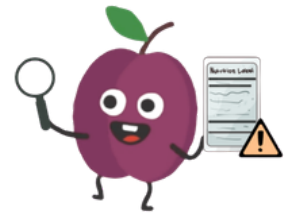




Staying Ahead of the Food Additive Bans: Steps for Success



What are Ultra-Processed Foods (UPFs)?

There is currently no universally accepted definition of UPFs, but they tend to be highly processed foods, unnaturally brightly colored, and contain ingredients such as artificial flavors, synthetic food dyes, preservatives, and/or sweeteners.

Various frameworks are used to classify UPFs. The most common is NOVA, which groups foods based on the level of processing. NOVA may be too broad, and can incorrectly label some healthy, nutrient-dense foods as UPFs.



States such as California, Louisiana, West Virginia, Texas, Utah, and Arizona have passed legislation banning specific synthetic food dyes and preservatives. This guide provides the essentials.

UPFs: Legislation Landscape

2025-26 saw a wave of new legislation targeting UPF Ingredients of Concern

- Total bills introduced: over 100 across 37 states
- Bipartisan support
- Bills passed: about 20 (and more by the time that you read this)



Article Spotlight: UPFs in School Meals: Challenges and Opportunities

www.healthyeatingresearch.org



FOOD FIX:
Must-read newsletter about all things food policy

www.foodfix.co



NOVA Classification System - Academy of Nutrition and Dietetics

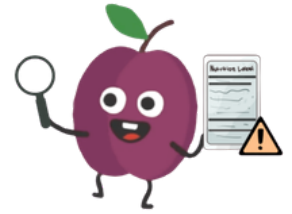
“Nutrition professionals should question the simplicity of the Nova system as a tool to denote healthful foods based only on processing and not also considering the nutritional quality of the foods.”

www.eatrightpro.org Examining the Nova Food Classification System and the Healthfulness of Ultra-Processed Foods, 8/19/2024

Laws differ widely in the definition of banned ingredients and their derivatives, their scope (NSLP vs. competitive foods vs. statewide ban), and their phase-out schedule...
but there is a lot of consensus.



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Most Common UPFs Banned in School Meals: Nuggets to Know

Based on a comprehensive review of thousands of school nutrition products completed in January 2026

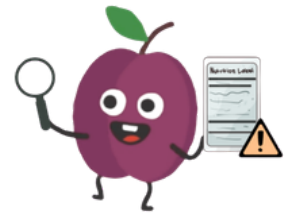
Least
common
in SN

- BVO - Banned by Aug 2, 2025 - No Items
- Propylparaben - Banned in CA by Jan 1, 2027 - No items in School Nutrition
- Red Dye #3 - Banned by January 15, 2027 - No items in School Nutrition
 - Many manufacturers have replaced Red Dye 3 with Red Dye 40
 - Non-SN food: sprinkles, red velvet, marachino cherries, red-colored tortillas
 - Interesting Fact: Carmine is a natural red dye. It consists of crushed insects, so it is not vegetarian, Halal, or Kosher.
- Potassium Bromate - 8 Items
 - Keeps bread puffy. Only found in processed yeast-risen breads
 - Also called “Bromated Flour”
 - Found in: soft-baked pretzel dog, par-baked pizza crust
- Azodicarbonamide (ADA) - 12 Items
 - Keeps bread puffy. Replaced with DATEM, which is okay
 - Found in: bagels, pizza crust
- BHA (Butylated Hydroxyanisole) - 104 Items
 - Keeps high-fat foods from going rancid during long frozen storage
 - Found in: Anything containing pepperoni or sausage
 - Practical Takeaway: Removing means a shorter frozen shelf life
- Blue 1 & 2 (250), Green 3 (none), Red 40 (119), Yellow 5 & 6 (100)
 - Cheesy flavors: cheese-powder chips, cheese sauce, cheddar, American cheese
 - Fruit flavors: Pop-Tarts and fruit-filled pastries, fruity cereals and cereal bars, brightly colored frozen fruit slushies, gelatin, jelly, and candy-themed food
 - Frostings and sprinkles - frosted cookies and sprinkles
 - Brightly colored condiments: dipping sauces, salad dressing, pickles, and relish
 - A La Carte Smart Snack products: Fruit snacks, electrolyte sports drinks, carbonated beverages, fruit-flavored beverages, popsicles, and ice creams

Most
common
in SN



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Secondary Watch List: Some States have banned...

Titanium Dioxide - Bans in Arizona and Texas, 2026-27 school year - 12 Items

- Makes food brighter and whiter
- Found in: savory creamy white sauces (Alfredo sauce and mix, sausage gravy, ranch dressing), frosting and glazes, all powdered sugar donuts, mashed potatoes

Caramel Color - Class III and IV - Ban in Texas, 2026-27 school year

- What to know: FDA regulations require “caramel color” to be listed on ingredient lists, but not the type of caramel color, so labels are not enough.
 - Class I and II Caramel Colors are allowed
 - Additional vendor documentation will be needed to determine compliance
- Found in: Pre-cooked browned meat such as patties, crumbles, sausage, fajita strips

Artificial sweeteners - Ban in Louisiana, 2028-29 school year

- Acesulfame Potassium, Aspartame, Sucralose
- Found in: pancake sausage on a stick, pancake pups
- Non SN or A La Carte: light yogurt, sugar-free and reduced sugar sauces such as pancake syrup, jam, and jelly, sweetened sparkling flavored water, zero sugar electrolyte beverages, sugar-free coffee syrups, and low sugar hot cocoa mix

A word about USDA Commodities:

The only food component that was found to contain banned UPF ingredients is the Meat/Meat Alternate group.

Synthetic food dyes were found in cheddar and American cheeses.

Carmel Color was found in browned meats, though the type of Carmel Color was not identified.

In my study, grains, fruits, and vegetables did not contain any banned ingredients.

Where UPFs sneak in: From areas outside our school nutrition programs

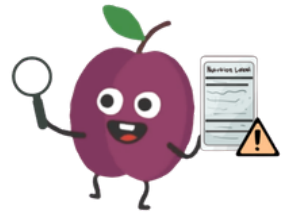
- Distributors that provide retail and restaurant products
- Catering and Competitive food sales
- Last-minute substitutions
- Long shelf life products or low turnover
- Products purchased at a discount
- Local products and smaller manufacturers new to school nutrition

OR the product has already been reformulated and your product sheet is old!





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Action Plan for UPF Compliance

School Nutrition Programs

- Create a banned products list
- Add name variations and acronyms
- Notify purchasing and all suppliers
- Incorporate into SOPs
- Flag and review high-risk products first
- Validate products before purchasing
- Communicate commitment district-wide

Vendors & Food Suppliers

- Review products for UPFs and banned additives
- Don't rely on distributors to communicate formulation changes
- Publicly commit to eliminating UPFs
- Align product availability with school compliance timelines
- Provide lists of compliant products, certifying banned UPFs

School Nutrition as a Public Health Leaders

School Nutrition Guiding Principles:

- Mission driven
- Built on transparency
- Focused on nutrient density
- Grounded in strong child-health nutrition standards outcomes
- Ahead of the game on Ingredients of Concern



AI Prompts to Support Food Additive Ban Planning For Mission, Decision-Making, and Communication



www.myschoolrd.com

Use these AI prompts to turn big ideas into clear mission, policy, and SOP language.

Customize each prompt with your district's requirements, priorities, and timeline before using.

Thanks for everything you do to keep school meals nutritious, safe, and compliant!

Want to chat or learn more?

Email melissa@myschoolrd.com

Free Resources at: www.MySchoolRD.com