

STAYING AHEAD OF THE FOOD ADDITIVE BANS

Steps for Success

Sunday, July 12, 2026

1:00-2:30 pm

Melissa Manning, RDN



Speaker

Melissa Manning

CEO & Founder, My School RD



#ANC26 | #ThePowerofSchoolMeals | Charlotte, North Carolina



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Why I show up.

I show up because of the people I work with, who lead with integrity, grit, and purpose.

I show up so students can focus on learning instead of hunger.

I show up because a meal can offer dignity, belonging, and sometimes, it feeds a lonely child's heart, as well.



Agenda

- What are UPF's?
- Defining UPF's
- UPF Red Flags
- Manufacturer Spotlights
- Case Studies
- Action Plan

Disclosures & Affiliations

Melissa Manning-
CEO & Founder
My School RD

- 50+ School Food Authorities
- Academy of Nutrition and Dietetics
- Chef Anne Foundation
- LunchAssist PRO Training
- The LunchMaster
- Institute of Child Nutrition



DESCRIPTION

Ultra-processed Foods (UPFs) are the latest buzzword, and expectations are high for manufacturers and schools to adjust quickly.

This session will demonstrate how tools and technology can streamline compliance and alleviate stress. Create an action plan to pinpoint products of concern, track compliance, and clean up your menus with confidence.

Then it's time to share the good news! We'll conclude by demonstrating the use of an AI prompt library to support communication with parents, principals, and school boards.



Poll: Which best describes your roll?

- School Nutrition Director or Manager
- School Nutrition Staff
- Industry: Manufacturer / Food
- Dietitian or School Nutrition Consultant
- Other

What are UPF's



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An Intro to Ultra-Processed Foods

What are Ultra-Processed Foods (UPFs)?

- Highly processed foods made with multiple additives, such as synthetic dyes, sweeteners, preservatives dough conditioners, etc.
- There's no single, universally accepted definition, but the NOVA classification is commonly used

The Case for Change:

- UPFs are linked to higher calorie intake, behavioral changes, poor nutrition, and even cancer.



Defining Ultra-Processed Foods

Everyone is Weighing in...

FDA & USDA:

Issuing a formal request for expert opinions and research to establish a uniform definition of UPFs

World Health Organization (WHO):

Formal recognition of health concerns related to UPF intake. Formation of an expert guideline development group to develop global recommendations on UPF consumption.



Defining Ultra-Processed Foods

NOVA Classifications

Developed in Brazil in 2009, NOVA is widely used to classify UPFs.

But how useful is it for public health policy?

What NOVA Tracks:

- Level of processing and processing techniques
- Ingredient number and form
- Additives / industrial ingredients

Defining Ultra-Processed Foods

NOVA Classifications

Group 1:
Unprocessed
or minimally
processed

Fruits, veggies,
nuts & seeds,
eggs, poultry,
etc.

Group 2:
Processed
culinary
Ingredients

Butter,
veggie oils,
sugar, salt,
etc.

Group 3:
Processed
Foods

Canned
veggies,
canned
meats,
cheese, etc.

Group 4:
Ultra-processed
Foods

Packaged
snacks,
sweets, breads,
sweetened
yogurts,
frozen foods. etc.



Defining Ultra-Processed Foods

NOVA Classifications

What NOVA Misses:

- Nutrient Density
- Possible misclassification as ultra-processed

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.”*

Ingredient Guide for Better School Food Purchasing



www.IngredientGuide.org



Who We Are

The original Ingredient Guide for Better School Food Purchasing was developed in 2014 by school nutrition leaders from seven districts in the upper Midwest region, the nonprofit School Food FOCUS, and Lisa Lefferts, Senior Scientist at Center for Science in the Public Interest. In 2019, updating the Ingredient Guide became a project of FoodCorps' supply chain engagement work group which was facilitated by Jillian Dy, Director of Supply Chain Engagement. The guide is no longer a project of FoodCorps' and is now led by the coalition of the 2023 contributors.

Contributing Members:

- **Bertrand Weber** – Director of Culinary and Wellness Services, Minneapolis Public Schools
- **Ashley Nitzkowski, RD** – Dietitian, Culinary and Wellness Services, Minneapolis Public Schools
- **Tammy Yarmon** – Director of Nutrition Services, Omaha Public Schools
- **Angela Richey, MPH, RD, SNS** – Director of Nutrition Services, Roseville Area



Poll: Has your organization started responding to UPF legislation?

- Yes, changes are being implemented
- Somewhat, in the planning stages
- No, not yet

Defining Ultra-Processed Foods

UPF Legislation Landscape

37+ states are currently advancing UPF-related legislation

Over 100 total bills:

- Legislative progress ranges:
 - Introduced → Enacted
- 18+ bills have already been signed into law
- States in the spotlight: California, Louisiana, West Virginia, Texas, Utah, and Arizona

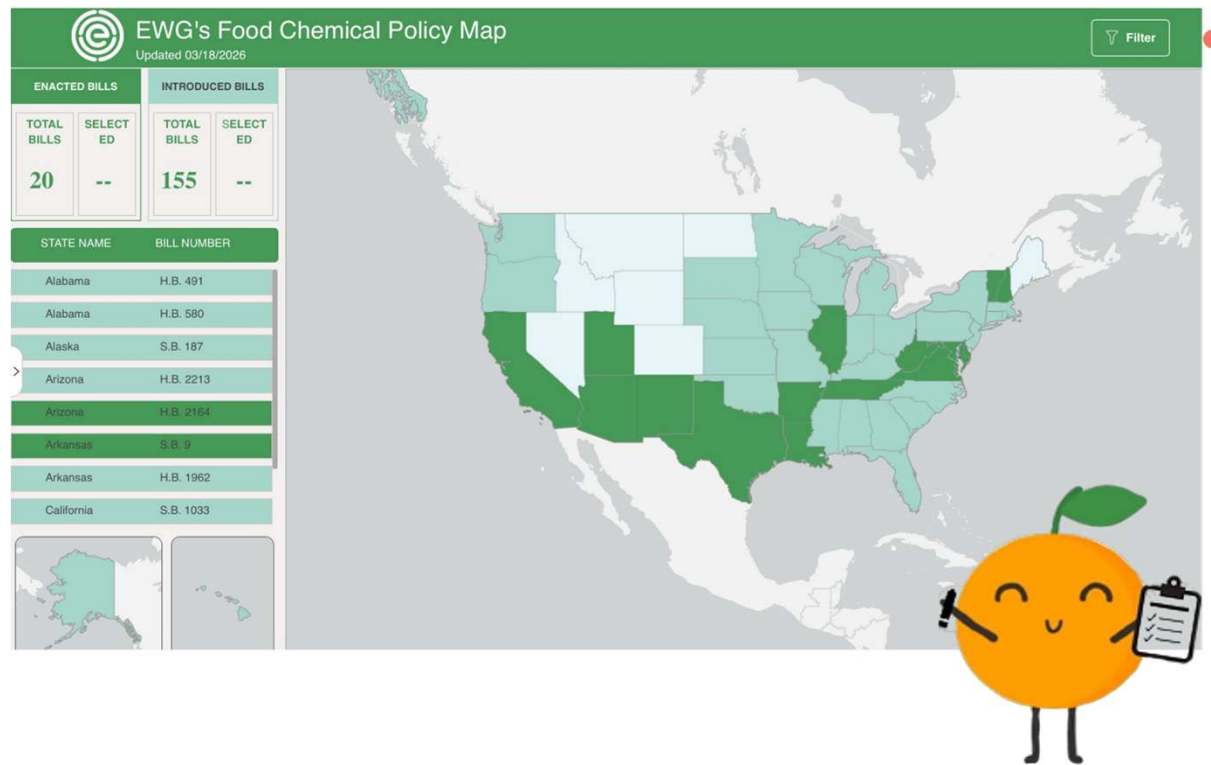
Resources

SNA's UPF
Tracker Policy



Resources

EWG's UPF Policy Tracker



My School RD's UPF Legislation Tracker

- Key UPF legislation affecting school foods
- When legislation passed and when it takes effect
- Who the requirements apply to
- Ingredients banned

Passed UPF Legislation	Totals	Ingredients Guide	FDA/Federal	Arizona HB 2164	Arkansas SB 9	California AB 1264
Ingredients of Interest						
Link to Bill	[State laws only]	https://ingredientsguide.org/wp-content/uploads/2025/04/food20231900-fullname-ident-guide.pdf		https://legiscan.com/AZ/bill/HB/2164/2025	https://legiscan.com/AR/bill/SB/9/2025	https://legiscan.com/CA/bill/AB/1264/2025
Timeline			01/15/2027 red 3 banned BVO ban effective 08/02/2024	Passed 04/14/2025 Bans effective starting in the 2026-27 school year	Passed 04/18/2025 Effective 01/01/2028	Passed 10/08/2022 Effective 12/31/20 synthetic food dyes red 3) Define "UPF" of concern 6/01/2028 Effective 07/01/202 of concern
Who It Applies to			Universal ban on red 3 and BVO	Any school participating in federally funded or assisted nutrition programs	Food companies cannot manufacture or sell products containing banned ingredients (can incur fines if banned ingredients are not removed)	SN competitive for NSLP/DBP entries NOT APPLY TO USE Vendors must report by 02/01 each starting in 2028
X = to ban/unwanted, ? = of concern ("watch list")						
Artificial Colors						
Artificial food colorings (general)						
Synthetic Food Dyes (see 1, Blue 2, Green 3, Red 40, Yellow 5, Yellow 6)		X	X (red 3)	X		X (Blue 1 & 2, green 3 & 6)
Blue 1	9			X		X

Getting to the root of UPF bans





Defining Ultra-Processed Foods

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.



Defining Ultra-Processed Foods

Arizona's House Bill 2164

Passed April 14, 2025

Effective beginning in the
2026-27 school year

Under this bill, an “Ultraprocessed food” is a food or beverage containing at least 1 of the following:

- Blue Dye 1
- Blue Dye 2
- Green Dye 3
- Red Dye 3
- Red Dye 40
- Yellow Dye 5
- Yellow Dye 6
- Potassium Bromate
- Brominated Vegetable Oil
- Propylparaben
- Titanium Dioxide



Defining Ultra-Processed Foods

Texas's Senate Bill 314: Passed May 27, 2025

Effective beginning in the 2026-27 school year

Outlines “certain additives” to be banned from school meals:

- Brominated Vegetable Oil
- Potassium Bromate
- Propylparaben
- Azodicarbonamide
- Butylated Hydroxyanisole (BHA)
- Blue 1
- Blue 2
- Green 3
- Red 3
- Red 40
- Yellow 5
- Yellow 6
- Citrus Red 3
- Orange B
- INS No.A150c/ammonia caramel (Class III)
- INS No.A150d/sulfite ammonia caramel (Class IV)
- Titanium Dioxide
- Any “substantially similar” additives to those listed here

Defining Ultra-Processed Foods

California's Assembly Bills 418, 2316, 1264: Passed 2023, 2024, 2025

- Jan 1, 2027: Bans BVO, Potassium Bromate, Propylparaben, Red Dye 3
- Dec 31, 2027: Blue 1 and 2, Green 3, Red 40, Yellow 5 and 6
- June 1, 2028: Deadline to define “UPF of concern.”
- July 1, 2029: Schools begin phasing these foods out
- July 1, 2032: Vendors may not sell these foods to schools
- July 1, 2035: Full ban on “UPF of concern” in school meals

Brocc-ing
school
meals!





Defining Ultra-Processed Foods

California's Assembly Bill 1264: Passed October 8, 2025

The first law defining UPFs in the United States

A food or drink is considered a (UPF) if it:

- Has certain additives (e.g., emulsifiers, synthetic food dyes, flavor enhancers)

AND has either:

- High saturated fat ($\geq 10\%$ of total kcal), sodium (≥ 1 mg per kcal), or added sugars ($\geq 10\%$ of total kcal), or
- Non-nutritive sweeteners (like sucralose, stevia, xylitol) or certain other sweetening substances

Foods identified as a “UPF of concern” will be phased out of school meals

Defining Ultra-Processed Foods

Most common additives banned:

- **Dyes:** Blue 1 and 2, Green 3, Red 3 and 40, Yellow 5 and 6
- **Emulsifier:** Brominated Vegetable Oil (BVO)
- **Flour Treatments:** Potassium Bromate, Azodicarbonamide (ADA or AZA)
- **Preservatives:** Propylparaben, Butylated Hydroxyanisole (BHA)



Poll: What do you see as the top challenge in eliminating UPFs?



- Lack of a definition
- Cost or budget constraints
- Product availability
- Student (or consumer) acceptance
- Time or labor constraints
- Regulatory uncertainty
- Something else



UPF Ingredients: Where to look

- **Brominated Veg Oil (BVO):** FDA ban August 2025 – No items
- **Propylparaben:** Banned in CA by Jan 1, 2027 – No items in SN
- **Red Dye 3:** FDA ban January 15, 2027
 - Non-SN food: cherries, red colored tortillas
 - Red Dye 3 -> Red Dye 40

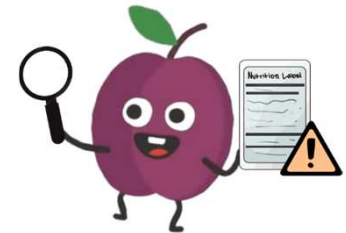
UPF Ingredients: Where to look

- **Potassium Bromate / Bromated Flour: 8 items**

- Keeps bread puffy. Only found in processed yeast-risen breads
- Found in: soft-baked pretzel dog, par-baked pizza crust

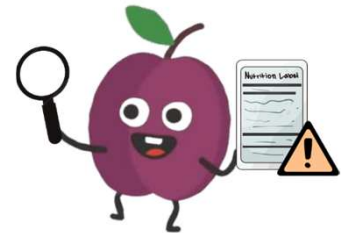
- **Azodicarbonamide (ADA): 12 items**

- Keeps bread puffy. Only found in processed yeast-risen breads
- Found in: bagels, pizza crust



UPF Ingredients: Where to look

- **BHA (Butylated Hydroxyanisole)- 104 items**
 - Keeps high-fat foods from going rancid during long frozen storage
 - Practical takeaway: Removing means a shorter frozen shelf life
 - Found in: Anything containing pepperoni or sausage
 - So many foods in SN contain pepperoni and sausage!



UPF Ingredients: Where to look

- **Blue 1 & 2:** 250-ish items found
- **Green 3:** no items found
- **Red 40:** 119 items found
- **Yellow 5 & 6:** 100-ish items found

Carmine is a natural red dye made
It is not vegetarian, Halal, or Kosher





School Foods Containing Banned Dyes



Real and Fake Cheese:

- Cheese (Yellow American and Cheddar)
- Cheese sauce
- Cheese chips and crackers

Fruit Flavors:

- Fruit-filled pastries
- Fruity cereals and cereal bars
- Fruit gelatin

Condiments & Desserts:

- Brightly colored dipping sauces
- Salad dressings
- Pickles and relish
- Frosted desserts, sprinkles

And more...

- Frozen juice cups
- 100% fruit juice slushies





A La Carte Products Containing Banned Dyes

Fruit Snacks

- Fruit snacks and leathers

Beverages

- Fruit-flavored beverages, even some made with juice
- Carbonated beverages / sodas

Sports Drinks

- Electrolyte drinks

Frozen Treats and Desserts

- Popsicles and ice cream
- Frosted items and sprinkles



UPF Ingredients: Where to look

Titanium Dioxide:

Savory creamy white sauces (alfredo, sausage gravy, ranch), frosting and glazes, powdered sugar donuts

Caramel Color 3 and 4: All types identified as “Caramel Color”; request from manufacturer

- Pre-cooked beef, turkey, and chicken
- All varieties: Crumbles, sausage, patties, strips, diced...

Artificial Sweeteners

Louisiana, 2028-29 school year

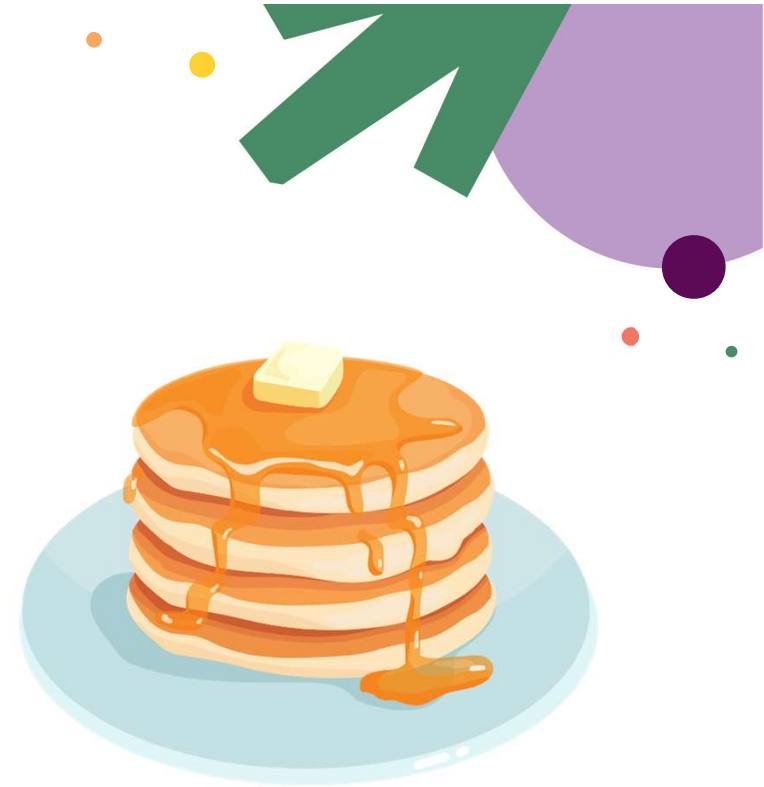
Acesulfame Potassium, Aspartame, Sucralose

Found in:

- WG Pancake sausage on a stick, pancake pups

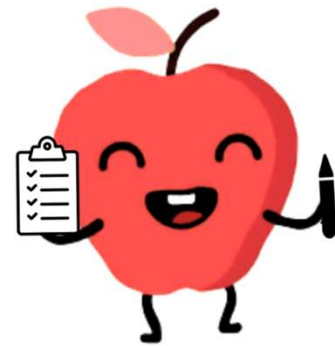
Less Common in School Nutrition:

- Light yogurt
- Sugar-free and reduced sugar sauces such as pancake syrup, jam, jelly
- Light Beverages: Sweetened sparkling flavored water, zero sugar electrolyte beverages, sugar-free coffee syrups, and low sugar hot cocoa mix



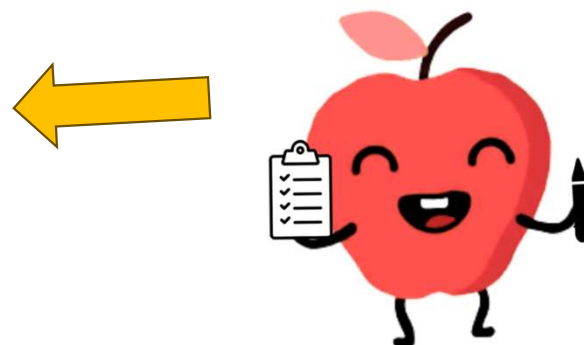
USDA Commodity Foods: What to Watch For?

- Meat/Meat Alternate
- Grains
- Vegetables
- Fruits



USDA “Brown Box” Foods: What to Watch For?

- **Meat/Meat Alternate**
- Grains
- Vegetables
- Fruits



More Control Over UPFs When Ordered from Manufacturers

Product A
Ingredients:
“Color added”



Product B
Ingredients:
“Annatto (vegetable color)”





Manufacturers Leading the Way

General Mills: Timeline of removing and re-adding synthetic food dyes

2015

- Removed artificial dyes, using natural color extracts
- Couldn't replicate all colors naturally (blue & green)

2016

- 75% of cereals reformulated without artificial colors/flavors
- Ongoing research for natural alternatives

2017

- Consumers missed vibrant colors, sales dropped
- Artificial dyes reintroduced to Trix



Manufacturers Leading the Way

Key Challenges:

- Large production scale makes procurement of new ingredients challenging
- Many manufacturers are looking to purchase the same natural colors, increasing cost, while locked in to bid pricing
- Natural colors naturally cost more and spoil faster
- Packaging and labeling must be updated
- Changes are permanent and costly

Resources

FDA: Dye Removal Tracker



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Industry Tracker: Pledges to Remove Petroleum-Based Food Dyes

Search:

[Export Excel](#)

Company	Product(s) or Brand(s) Affected	Planned Changes	Status
American Bakers Association	ABA Member List	Eliminate the use of certified FD&C colors in all baked goods provided to K-12 schools through the National School Breakfast, Lunch, and Competitive Foods Programs by the beginning of the 2026-2027 school year.	In progress
Conagra Brands, Inc.	Birds Eye®, Duncan Hines®, Marie Callender's®, Slim Jim®	- Eliminate of certified color additives from U.S. frozen product portfolio by the end of 2025. - Will not sell products with certified color additives to K-12 schools by the beginning of the 2026-2027 school year. - Discontinue the use of certified color additives across U.S. retail portfolio by the end of 2027.	In progress
Consumer Brands Association	Member List	Stop using certified color additives for school meals by 2026 school year.	In progress



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PepsiCo Foodservice K-12 Portfolio 2025-2026 School Year

PepsiCo Item #	Description	Pack	Size	Estimated In-Market Timing*
Frito-Lay®				
77032	SUNCHIPS® WHOLE GRAIN SNACKS HONEY BBQ – SVL *NEW*	104	1 oz	July 2025
62984	BAKED CHEETOS® WGR CHEESE SNACKS CRUNCHY FLAMIN' HOT	104	.875 oz	August 2025
52889	BAKED CHEETOS® WGR CHEESE SNACKS CRUNCHY FLAMIN' HOT LIMON	104	.875 oz	August 2025
36098	CHEETOS® WGR FANTASTIX CHILI CHEESE	104	1 oz	August 2025
43578	CHEETOS® WGR FANTASTIX FLAMIN' HOT	104	1 oz	August 2025
36096	DORITOS® REDUCED FAT TORTILLA CHIPS COOL RANCH	72	1 oz	August 2025
62829	DORITOS® REDUCED FAT TORTILLA CHIPS FLAMAS	72	1 oz	August 2025
31748	DORITOS® REDUCED FAT TORTILLA CHIPS NACHO CHEESE	72	1 oz	August 2025
78095	DORITOS® REDUCED FAT TORTILLA CHIPS TANGY GOLDEN SRIRACHA *NEW*	72	1 oz.	August 2025
78245	STACY'S® MULTIGRAIN PITA CHIPS - LSS *NEW*	64	1.375 oz	August 2025
20518	WALKING TACO REDUCED FAT DORITOS® NACHO CHEESE TORTILLA CHIPS	44	1.4 oz	October 2025
62933	BAKED CHEETOS® WGR CHEESE SNACKS CRUNCHY CHEESE	104	.875 oz	November 2025
56882	BAKED RUFFLES® POTATO CRISPS CHEDDAR & SOUR CREAM - SVL	60	.8 oz	November 2025
74993	CHEETOS® WGR FANTASTIX RANCH	104	.9 oz	November 2025
21910	CHEETOS® WGR REDUCED FAT PUFFS	72	.7 oz	November 2025



Spotlight: Manufacturers Leading the Way

All Natural Colors:

- Spirulina (blue/green)
- Beet Juice (pink/red)
- Carmine (red)
- Annatto (orange/yellow)
- Turmeric (gold/yellow)

Spotlight: Manufacturers Leading the Way

All Natural Colors:

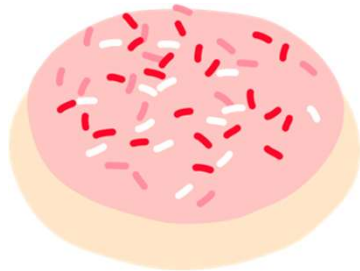
- Spirulina (blue/green)
- Purple carrot (purple)
- Beets (pink/red)
- Carmine (red)
- Red radishes, elderberry (red)
- Annatto (orange/yellow)
- Aji Amarillo (yellow/gold)
- Turmeric (gold/yellow)



Reformulated Products: Potential Hidden Allergens

Reformulated products may look the same but contain new allergens.
What was special diet safe last year might not be today.

Original Product
“Artificially colored”
“Contains: Wheat”



Reformulated Product
“Naturally colored, soy lecithin*”
“Contains: Wheat, SOY”



*Why soy lecithin is added: Emulsifier that helps evenly disperse natural food colors in the product.

Where UPFs sneak in: From areas outside school nutrition

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



Case Studies

New York City Schools prohibit 50+ additives and ingredients, including:

- Synthetic food dyes and artificial flavors
- Non-nutritive sweeteners (aspartame, saccharin)
- Flour additives (propylparaben, potassium bromate)
- Preservatives (BHA, BHT, EDTA)
- And more...

NYC Food Standards outline ingredient restrictions that “Require all foods and beverages purchased do not contain” a specific list of additives and ingredients

San Francisco Unified School District prohibits 10+ specific additives, including:

- Artificial colors C flavors
- BHA C BHT
- Disodium dihydrogen-sodium EDTA
- Hydrogenated oils C artificial trans fats
- High-fructose corn syrup

And more...

SFUSD tracks additives as allergens to ensure school meals are free from anything on the prohibited list.

NYC Prohibited
Foods: Full List



SFUSD Prohibited
Foods: Full List



Ingredient Guide for Better School Food Purchasing

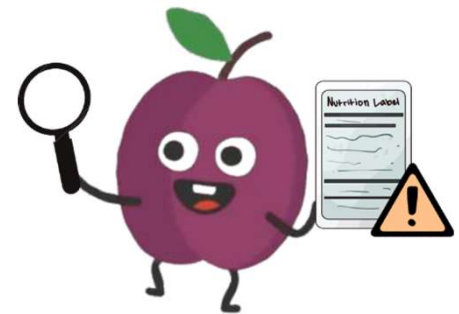


www.IngredientGuide.org



Chatbot Prompts

- Prompt library handout on the conference app
- Tip: Download the app on your phone and talk through it



Notebook LM

- Free research assistant by Google
- “Thinking Partner”
- Uses documents and files you upload into a “notebook”

Tip:
Use
“Audio”
feature for
long car
rides.

Action Plan

- Create your own Banned Ingredients List timeline.
- Review "Red Flag" products first.
- Use technology:
 - Keyword search for UPFs in product spec folder
 - Search sub-ingredients in menu planning software (if available)



Action Plan

- Write SOPs, incorporate into bids and RFPs
- Notify purchasing and suppliers
- Validate products before purchasing
(suggestion – set up UPFs as Attributes in software)
- Communicate commitment district-wide



Leadership Values in School Nutrition

- Transparent, values-driven leadership
- Setting goals beyond compliance
- Our programs are doing what others aren't
- On our way to be the only place you are guaranteed to get a UPF-FREE free meal in America



Food for Thought

What strategies will you use at your organization to reduce UPFs in school meals?



Key Takeaways

- Create an action plan to pinpoint products of concern, track compliance, and clean up your menus with confidence.
- Tools and technology can streamline compliance and alleviate stress.
- Use expected product categories (sausage, pepperoni, unnaturally-colored bright foods)
- Manufacturers can be tremendous resources. They are experts regarding ingredient bans, and mission-driven partners who are here to support your success!



Questions?



Send follow-up questions to:

Melissa Manning, RDN

Melissa@MySchoolRD.com

We want to hear from *you*!

Please add this session
on the ANC App to
evaluate your experience.

