



Navigating the Food Additive Bans with Confidence

School Nutrition Industry Conference - 2026



UPFs in School Meals: What You Need to Know

What are Ultra-Processed Foods (UPFs)?

There is currently no universally accepted definition of UPFs, but they tend to be highly processed foods with bright colors that contain multiple additives, such as flavors, synthetic food dyes, preservatives, and/or sweeteners.

Various frameworks are used to classify UPFs. The most popular is NOVA, which groups foods based on level of processing, but it is too broad, banning non-UPF foods.



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

UPFs: Legislation Landscape

2025 saw a wave of new legislation targeting UPFs, additives, food chemicals, etc.

- Total bills introduced: more than 90 across 33 states
- Bills passed: at least 20 (possibly more by the time that you read this)



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.

Want to chat or learn more?
Email melissa@myschoolrd.com
or scan the QR code





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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 conducted in Dec 2025

Least
common
in SN

- BVO (Brominated Vegetable Oil) and Propylparaben
 - Could not find any SN products that contained these two ingredients.
- Potassium Bromate
 - Keeps bread puffy. Only found in processed yeast-risen breads
 - Also called “Bromated Flour”
 - Found in: one soft-baked pretzel dog and a pizza crust
- ADA (Azodicarbonamide)
 - Keeps bread puffy. Replaced with DATEM, which is okay
 - Found in: the same pizza crust that contained Potassium Bromate
- BHA (Butylated Hydroxyanisole)
 - Keeps high-fat foods from going rancid during long frozen storage
 - Found in: pepperoni in several pizzas, breakfast sausage in breakfast pizzas
 - Practical Takeaway: Removing means a shorter frozen shelf life
- Red Dye #3
 - Many manufacturers have replaced Red Dye 3 with Red Dye 40
 - Found in: sprinkles, red velvet cookies, and fruit cocktail, WG conchas, bright red-colored tortillas, and tri-color tortilla chips.
 - Interesting Fact: Carmine is a natural red dye. It consists of crushed insects, so it is not vegetarian, Halal, or Kosher.
- Blue 1 & 2, Green 3, Red 3 & 40, Yellow 5 & 6 - Watch for the following:
 - 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, fruit gelatin
 - 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 AZ and Texas

- 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

Caramel Color - Class III and IV - Banned in Texas

- 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 - Louisiana, 2028-29 school year

- Acesulfame Potassium, Aspartame, Sucralose
- Found in: pancake sausage on a stick, pancake pups, 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 spec 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

Spotlight: School Nutrition as a Public Health Leader

School Nutrition:

- Values transparency
- Has stringent nutrition standards based on child health outcomes



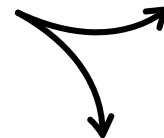
Manufacturers' commitments to safer school meals:

Buena Vista - Naturally colored holiday cookies
General Mills - Removal of dyes in cereal products
PepsiCo - all K-12 products are dye-free in Nov 2025

Call to Action:

🔍 As regulations on UPFs evolve, join the conversation shaping the future of school nutrition!

- 📄 Scan the QR Code to take our short survey on:
 - How your organization is preparing for UPF bans
 - Challenges you're facing or anticipate
 - Support or resources that would help you adapt to the upcoming changes



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

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