

Make America Healthy Again Commission
200 Independence Avenue, S.W.
Washington, DC, 20201

August 6, 2025

Dear MAHA Commission,

The National Pork Producers Council (NPPC) appreciates the opportunity to partner with the Make America Healthy Again (MAHA) Commission to enhance our children's health and protect American agriculture. NPPC is the global voice for the U.S. pork industry and consists of 42 affiliated state organizations representing America's 60,000-plus pork producers who supply a demonstrably safe, wholesome, and nutritious protein product appreciated on American and international tables.

Farmers in the pork industry work hard every day to provide a reliable, safe, affordable, and healthy protein. The only way American farmers can achieve this is by utilizing tools and technology that help grow our crops and raise our animals. All farmers strive for the same goals: protect our environment for the next generation, raise our animals humanely, and provide nutritious protein for our children and communities.

With the prevalence of diet-related diseases and the continued challenge of food security, nutrition is paramount to addressing these critical issues in the United States. Additionally, food insecurity and diet-related diseases tend to disproportionately impact underserved communities and adolescent populations. Pork can—and farmers are eager to—fill the protein deficiency gap by providing amino acids, vitamins, minerals, and other micronutrients. Food inflation is a major concern for the American people, and pork remains an affordable protein option for families.

We all agree that America's food must be produced safely and responsibly to deliver healthy food to populations domestically and abroad. It is critical that the MAHA Commission address the following concerns to meaningfully take on childhood chronic disease while protecting the ability of farming and agriculture to produce healthy food.

NPPC Priority Areas of Concern:**1. Ultra-processed foods definition****a. NPPC asks the MAHA Commission to consider the following when developing an ultra-processed food definition, to maintain American's access to nutrient dense foods:**

- i. "Junk foods" do not provide nutritional benefits to our children; instead, they deliver a high number of calories that contribute to obesity. "Ultra-processed foods" is a catch-all term and is easily misused to categorize foods considered detrimental to our children's health. However, it is important for foods that are processed to increase food safety and preservation is not negatively or misleadingly labeled. In the definition proposed in the MAHA report, many nutrient-dense foods would fall into this category, unintentionally demonizing them.
 1. Pork is a versatile protein. There are many whole cuts – such as pork chops and pork tenderloin – as well as processed products using traditional techniques of curing, smoking, and salting – such as bacon, sausage, and ham. These processed products allow for increased shelf stability and food safety while maintaining nutrient density.
- ii. The most widely cited system of food classification is the Brazilian-led NOVA classification, which has serious limitations. It categorizes foods largely by the degree of processing, rather than by nutritional content or health impact. This has created confusion among consumers and policymakers alike.
- iii. For example, the NOVA system may label yogurt with fruit and cheese the same way it labels soda or snack cakes, despite radically different health implications. Similarly, bacon, sausage, and ham—foods preserved with salt or smoke for centuries—are often misclassified as "ultra-processed" without acknowledging their nutrient density and value as a protein.
- iv. A new, modernized framework should provide more guidance and nuance. It should be science grounded. Additionally, it should be a consumer-friendly classification system—one that recognizes the complex relationship between food, nutrition, and health outcomes.
- v. Guiding principles of an updated classification should focus on the following important delineations:
 1. **Nutrition over processing**
 - a. An updated classification should evaluate and distinguish foods primarily by nutrient density, physiological impact, and additive content—not simply by how they are made.
 2. **Respect for traditional foodways**

- a. Time-tested preservation methods like curing, smoking, and fermenting (used for meats, cheeses, and pickles) should be treated differently from industrial manufacturing techniques that engineer foods for palatability. Safety and shelf stability of products should remain protected, along with nutrient value.

3. Clarity for consumers and policymakers

- a. An updated system should distinguish between foods to be promoted daily, foods to be consumed in moderation, and foods that contribute to metabolic harm when consumed regularly or overconsumed.

4. Support for agriculture and health

- a. A modernized food classification system should position whole foods from farms—especially animal and dairy-sourced protein—as central to public health rather than conflating them with industrial snacks or sodas.

2. Food additives

a. NPPC asks that the Commission protect important approved food additives that are used to enhance food safety, shelf life, and nutritional availability.

- i. Many food additives play a critical role in protecting public health by enhancing food safety, shelf stability, and nutrient availability. These food additives are not added to increase the palatability of foods but rather to help deliver safe and nutritious food. Food additives for these uses should not be placed in the same category as those additives only intended to alter the palatability of food.
- ii. Approval of food ingredients based on rigorous studies and risk assessments should not be undermined by non-scientific approaches. NPPC believes in gold standard scientific practices to enhance food safety and public health. FDA already provides a robust process for determining whether food additives are safe for consumption prior to entering the food supply under the FD&C Act (food additives, 21 C.F.R. Part 17).
- iii. FDA must continue to recognize the critical role that certain food additives play in maintaining food safety, extending shelf life, and ensuring the consistent availability of essential nutrients. For example, butylated hydroxytoluene (BHT) is an antioxidant that helps preserve foods, especially meats, from spoiling. BHT has been assessed by FDA and multiple international bodies, among them the Scientific Committee for Food, the European Commission, the Joint FAO/WHO Expert Committee on Food Additives, the European Food Safety Authority, the Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail, the Norwegian Scientific Committee for Food and Environment, and

the Scientific Committee on Consumer Safety. BHT is not only approved in the United States by FDA under 21 C.F.R. Part 170-186 but also has been accepted in the General Standard for Food Additives under CODEX STAN 192-1995. This means there is a globally accepted standard for use of BHT. Codex Alimentarius has also set average daily intakes of BHT in foods. FDA takes the same approach with food additives by setting maximum levels of use in foods.

- iv. Respectfully, we note the Commission report's sentence regarding BHT includes citations to two reports. The first is references a distinctly separate chemical compound (BHA) while the second refers to a 25-year-old study that has been cited in more recent research showing the promising potential of BHT in, for example, Alzheimer's disease ([Oral administration of butylated hydroxytoluene induces neuroprotection in a streptozotocin-induced rat Alzheimer's disease model via inhibition of neuronal ferroptosis - PubMed](#)).
- v. Food additives such as BHT are indispensable in preventing foodborne illnesses and preserving the nutritional quality of foods. This is a particularly important benefit for those who are most vulnerable, including children, pregnant women, elderly, and immunocompromised individuals. While it is important to always ensure the safety of food additives, it is also critical to consider the benefits certain food additives have in preserving food and enhancing food safety to deliver consistently nutritious food. Any evaluation of the risks of a substance such as BHT that has been previously approved needs to factor in the realistic levels of potential consumption of the additive and the benefits it provides, especially to vulnerable populations.
- vi. Please see NPPC's comments on the *Tool for the Prioritization of Food Chemicals for Post-Market Assessment* (Docket. FDA-2025-N-1733) for further information on food additives.

3. Generally Recognized as Safe (GRAS) status

- a. **NPPC asks the Commission and FDA to exclude animal feed from the GRAS reform to protect animal health and continue to supply nutritious, safe food for all Americans. This can be accomplished while addressing the root causes of chronic illness in humans, including children.**
 - i. Under 21 C.F.R. 570, GRAS status applies to both human and animal feed. Although the MAHA report's intention is to seek rulemaking for GRAS human food ingredients, there are unintended consequences of changing regulations as these would apply to animal feed as well. This will lead to the loss of critical agricultural nutritional tools that safeguard animal health and welfare.

- ii. The FDA Center for Veterinary Medicine holds GRAS status for animal feed to a high standard, and each ingredient undergoes a rigorous GRAS process. GRAS is a safe and appropriate pathway for animal feed and ingredients.
- iii. According to 21 C.F.R. 582.1, substances are generally recognized as safe when they are used for the purposes indicated and in accordance with good manufacturing or feeding practices. These products, when used for the intended species for a specific purpose, are safe.
- iv. GRAS substances for animal feed have undergone rigorous scientific evaluation in addition to long-term historical use. These often align with international standards such as Codex Alimentarius and the European Food Safety Authority. Changes to GRAS status could cause discrepancies with global regulations and cause challenges with trading partners.
- v. Animal nutrition is paramount for humanely raising food-producing animals and, ultimately, safe and nutritious food for humans. Changing GRAS status for animal feed would have devastating consequences, resulting in nutritional deficiencies, digestive or metabolic disorders, and reduced growth and productivity of food-producing animals.

4. Risk-based Science

a. NPPC asks the Commission to follow a risk-based science approach, rather than a hazard-based approach that would lead to over-regulation of American farmers.

- i. Maintaining access to the tools and technology used to raise food-producing animals is critical. Risk-based science allows for these vital tools to be researched at the most reliable level of evidence to ensure the safety of the product.
- ii. Gold standard science as defined in the Executive Order supports reproducible, rigor, and unbiased peer review; risk-based science would restore the America's faith in scientific enterprise and institutions. Hazard-based science on the other hand is an approach that would damage peer reviewed science. Hazard-based science identifies whether something *can* cause harm under any circumstance, while risk-based science assesses the *likelihood* that harm will occur under real-world conditions, taking into account both the hazard and the level of exposure. Science-based policy must focus on risk, not just hazards, to protect people and animals, use resources wisely, and support innovation without compromising safety.
- iii. The European Union (EU) has taken a precautionary, hazard-based approach to many tools and technology utilized in agriculture, leading to overregulation of the farmers and massive industry consolidation. Because of this approach, the EU has seen a steep decline in farms, especially small family farms. Our European counterparts have warned American farmers not to go down this same path of overregulation and follow the precautionary principle.



The Global Voice for
the U.S. Pork Industry

Thank you for listening to our concerns. We look forward to working together to advance public health and American agriculture.

Sincerely,

A handwritten signature in black ink, appearing to read 'Duane Stateler'. The signature is fluid and cursive, with a large, sweeping 'D' at the beginning and a stylized 'S' at the end.

Duane Stateler
NPPC President and Ohio pork producer