



March 17, 2026

The Honorable Brooke Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

RE: Leveraging USDA’s Global Branded Food Products Database to bring transparency into food retailers’ decisions to introduce new additives into the food supply

Dear Secretary Rollins,

On behalf of the Consumer Federation of America,¹ I am writing to alert you to recent findings that suggest increasing reliance on food additives, a trend that directly undermines the Administration’s “Eat Real Food” campaign, and to urge you to provide consumers with current, comprehensive data on product reformulation through the Department’s “Global Branded Food Products Database” or “Branded Foods” database.

Across the food marketplace, products that once contained relatively simple ingredients are quietly being reformulated with emulsifiers, gums, stabilizers, and other additives characteristic of ultra-processed foods. These changes rarely receive public attention. Manufacturers do not advertise them, and consumers typically only discover them by chance— if they notice them at all.

CFA recently documented this “ultra-processed food creep” among several products in the Whole Foods 365 brand product line. In addition to new additives in “highly processed” products like frozen pizza and popsicles, we found the addition of ingredients like guar gum to organic corn tortillas, and gellan gum to organic heavy cream.² Yet when we consulted the USDA Branded Foods database to try to determine when these formulation changes occurred, we found that the entries for the related food products were outdated,³ or simply did not exist.⁴

¹ The Consumer Federation of America (CFA) is an association of non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy, and education. Today, more than 250 of these groups participate in the federation and govern it through their representatives on the organization’s Board of Directors. Learn more at <https://consumerfed.org/>

² Thomas Gremillion & Ethan Weiland, *Ultra-Processed Food Creep*, Consumer Federation of America (March 10, 2026), <https://consumerfed.org/ultra-processed-food-creep/>

³ See, e.g., U.S. Dep’t of Agric., FoodData Central, 365 EVERYDAY VALUE, HEAVY CREAM entry at <https://fdc.nal.usda.gov/food-details/2052520/nutrients> (listing “cream” as the sole ingredient with last update reported on 10/28/2021)

⁴ See, e.g., U.S. Dep’t of Agric., FoodData Central, search Results for “365 corn tortillas,” <https://fdc.nal.usda.gov/food-search?type=Branded&query=365%20corn%20tortillas>



Restoring the Branded Foods database represents an important opportunity for USDA to help consumers “eat real food.” We were able to identify product reformulations thanks to data gathered via two separate “scrapes” of the Whole Foods website: one conducted by Harvard researchers in 2021,⁵ and the other by the popular health app GoCoCo in 2023.⁶ We have been informed, however, that in the years since the researchers collected these data, food retailers have developed “security” tools to prevent similar scrapes. As a result, tracking the extent to which food producers reformulate foods is nearly impossible.

This is a market failure that USDA is well-positioned to solve. The Department’s Branded Foods database already contains tens of thousands of branded food products and is widely used by researchers, policymakers, and public health experts to understand the U.S. food supply. Currently, the database fails to capture reformulations in a timely or comprehensive way, a gap that undermines transparency in the food system and limits the ability of researchers, policymakers, and consumers to understand what is actually happening in the marketplace. But USDA has the tools at its disposal to address this gap.

As a first step, USDA should reach out to major grocery retailers to obtain product ingredient information directly from retailer websites. Today, nearly every major grocery chain publishes detailed online product pages containing ingredient lists, allergen information, and nutrition facts panels for thousands of products. Retailers already allow third-party platforms—including grocery delivery services such as Instacart and other digital retail partners—to access and scrape this information for the purposes of online shopping and product search. Similar access for USDA would enable the Branded Foods database to populate and regularly update entries, ensuring that ingredient lists reflect the products currently sold to consumers. Further, ensuring that this data collection happens at regular intervals would give stakeholders the ability to track product reformulations over time.

Relying on voluntary action from food retailers to strengthen the Branded Foods Database has a high likelihood of success because food retail is highly consolidated, and because greater transparency will foster a level playing field for promoting the sale of more “real food,” consistent with the Administration’s objectives. USDA may also take unilateral action if needed. The law provides USDA with ample authority to collect and disseminate information about the food supply and agricultural products. For example, the Agricultural Marketing Act of 1946 authorizes the Department to acquire and disseminate useful information regarding the marketing, processing, and utilization of agricultural commodities (7 U.S.C. § 1622). Likewise, USDA’s research authorities permit the Department to conduct research relating to the processing, distribution, and consumption of food products (7 U.S.C. § 2204). Ensuring that the Branded Foods Database accurately reflects the ingredients and formulations of foods sold in the U.S. marketplace would directly advance these statutory purposes.

⁵ Barabási Lab, *GroceryDB* (GitHub repository), <https://github.com/Barabasi-Lab/GroceryDB>

⁶ GoCoCo, <https://www.gococo.app/>



Food companies are free to reformulate products with emulsifiers and other additives that may degrade their health profile, but those reformulations should not occur without public awareness. By bringing more transparency to the market, a more relevant USDA Branded Foods database will create market incentives for better formulations. It will also give public health researchers studying ultra-processed foods a sorely needed tool to study how the U.S. food supply is evolving and how those changes affect diet-related disease.

We would welcome the opportunity to discuss how USDA could collaborate with retailers, academic researchers, and public-interest organizations like CFA to modernize the Branded Foods Database and ensure that it reflects the reality on store shelves that Americans must contend with every day. Your staff may reach me the number below or via email at tgremlion@consumerfed.org.

Thank you for your consideration and for your continued work to improve the health and well-being of American consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Gremillion", with a long, sweeping flourish extending to the right.

Thomas Gremillion
Director of Food Policy
Consumer Federation of America