



April 9, 2026

Re: Opposition to Ingredient Restriction & GRAS Reporting Legislation, A1556/S1239

To the Honorable Members of the New York Assembly:

The organizations represented here are opposed to Assembly Bill 1556 and Senate Bill 1239.

Collectively, we represent America’s food, beverage, ingredient, agricultural, retail, and hospitality industries. Our members source, manufacture, distribute, and sell safe and wholesome products in New York and across the United States.

The United States has one of the safest, most efficient, and affordable food systems in the world, and we support a nationwide approach to food ingredient safety that is grounded in science and provides consistency for the food industry. We are opposed to this legislation as it would further a misguided patchwork of food and beverage regulation and impose huge, duplicative reporting requirements on businesses. This legislation will increase costs for consumers and add to consumer confusion.

The safety and quality of what we make and sell to our customers is of the highest importance, and we share a common commitment to a strong, unified federal food safety system. State ingredient restriction and reporting proposals, such as in this legislation, would supplant the authority of the U.S. Food & Drug Administration (FDA) to regulate the safety of the American food supply.

The food industry is facing significant headwinds and an emerging patchwork approach to food additive oversight will create untenable challenges. New York is an important state to the food industry, as the home to many manufacturers, retailers, and distributors, and your help is urgently needed to preserve this national network.

State legislation that restricts food ingredients shifts food safety decisions away from qualified scientists and regulatory experts and creates a state-by-state patchwork of inconsistent requirements that will increase costs, cause confusion around product safety, and erode consumer trust. By creating two different regulatory standards for the food and beverage industry - one enforced by New York and one

by the federal government - this legislation would inject additional costs into the food supply chain at a time when we should be doing all we can to bring affordability to consumers by lowering prices.

This legislation would increase administrative burdens on manufacturers. Information provided to FDA for a review of each ingredient is complex and detailed and it is very costly; estimates range to over \$1 million per review and differing data may be required by New York under the proposed law. It is not simply a matter of duplicating information already in hand.

This legislation will require the development of a new, unfunded public database. Costs to the state to manage and implement this enormous influx of data are estimated to be \$35 million and will necessitate additional staffing resources. None of this is necessary, as the FDA has announced a proposed rule on GRAS and Congressional legislation is pending; these bills are premature and unaligned with this effort.

The proposed legislation creates a significant competitive disadvantage for New York food and beverages by requiring manufacturers, retailers, and distributors to reformulate products and monitor product inventory specifically for New York residents.

Businesses in many other states could maintain existing operations unencumbered by what is proposed in A1556 & S1239. New restrictions on manufacturers, distributors and retailers also could hinder New York as the State competes with neighboring states for economic development opportunities. In fact, rather than create competing systems other states such as Maryland are aligning their laws to FDA actions.

The undersigned organizations therefore express our opposition to this legislation. It is critical that we maintain a national system for determining the safety of food ingredients that is grounded in science and supports consumer choice.

Sincerely,

American Beverage Association
Business Council of New York
Consumer Brands Association
Council for Responsible Nutrition
Flavor Extract Manufacturers Association
FMI, The Food Industry Association
Food Industry Association of New York
Food Ingredient Safety Coalition
Greater Rochester Chamber of Commerce
Independent Bakers Association
International Dairy Foods Association
Korean American Business Council of Greater New York
Korean American Grocers Association of New York
National Confectioners Association
New York State Restaurant Association
Northeast Dairy Foods & Suppliers Associations