



Stake in the GRAS: Companies Weigh FDA's Proposed Rule on the GRAS Exemption

Intro (0:00 – 2:50 min)

Main Content (2:50 min – 38:18 min)

- Introduction (2:50 min – 3:40 min)
 - [FDA Announces Proposed Mandatory GRAS Notification Rule | The Daily Intake](#)
- What are Food-Contact Materials? (3:40 min – 4:12 min)
- FDA Regulation of Food-Contact Materials (4:12 min – 6:32 min)
 - Food-Contact materials that are food additives require FDA pre-market clearance
 - Food Contact Notifications (FCN)
 - Clearances issued by FDA
 - Exemptions
 - Generally Recognized as Safe (GRAS)
- What is GRAS Exemption? (6:32 min – 7:18 min)
- How GRAS is Used in Practice in the Food-Contact Industry (7:18 min – 10:04 min)
- Self-GRAS Pathway (10:04 min – 19:23 min)
 - Voluntary GRAS Notification Program
 - Advantages, criticisms, and comparison to FCNs
- **FDA's New Proposed GRAS Rule** (19:23 min – 38:18 min)
 - [Substances Generally Recognized as Safe \(Proposed Rule\) | FDA](#)
 - Mandatory notification (reporting) to FDA of self-GRAS determinations
 - Comparison to existing GRAS notice program
 - Exemptions from GRAS Notice Requirement
 - Deadline for GRAS Notification
 - Streamlined Process for Existing GRAS Substances
 - Regulatory Process and Timeline
 - State and Federal Authority

Upcoming Keller and Heckman Events (38:18 min – 40:13 min)

- Seminar on October 6 – 7, 2026 - [Navigating TSCA: Basics and Beyond 2026 | Keller and Heckman](#)
- Webinar on October 8, 2026 - [What You Need to Know About Petitioning for Substances Intended for Contact with Drinking Water](#)
- Seminar on October 27 – 28, 2026 - [2026 Annual Food Packaging Law Seminar | Keller and Heckman](#)