



The Potential Impact of US State Regulations on the F&B Industry

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- Full time employee at Cargill – US
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Our purpose is to nourish the world in a safe, responsible and sustainable way.

How we source, make and deliver goods that are vital for living

Source and trade

Partner with farmers and ranchers growing crops and raising animals.



Originate, source, store and trade commodities.



Provide global insights and risk management solutions.

Make and transport

Transport goods from where they're grown and produced to where they're needed.



Craft meat, egg and alternative protein products, and salt, oils, starches, cocoa and sweeteners.



Formulate feed to support animal health and productivity.



Create nature-derived, bio-based products and biofuels.

Deliver for customers



Sell food products and ingredients, agricultural solutions and bio-based industrial products to manufacturers, farmers and ranchers, foodservice customers, retailers and consumers—to nourish the world in a safe, responsible and sustainable way.

We are

160K+

team members

Operating in

70

countries

With

159

years of experience

Topics to Cover

- Complexity of the US Food & Beverage Regulatory Framework
- Overview of State F&B Regulations – Regulations and Proposed Bills
- Historical Perspectives on State vs Federal Regulations
- Potential Impact of State-by-State F&B Regulations
- Trace One Compliance Cloud Digital Solution
- Can Any of This Be Fixed?

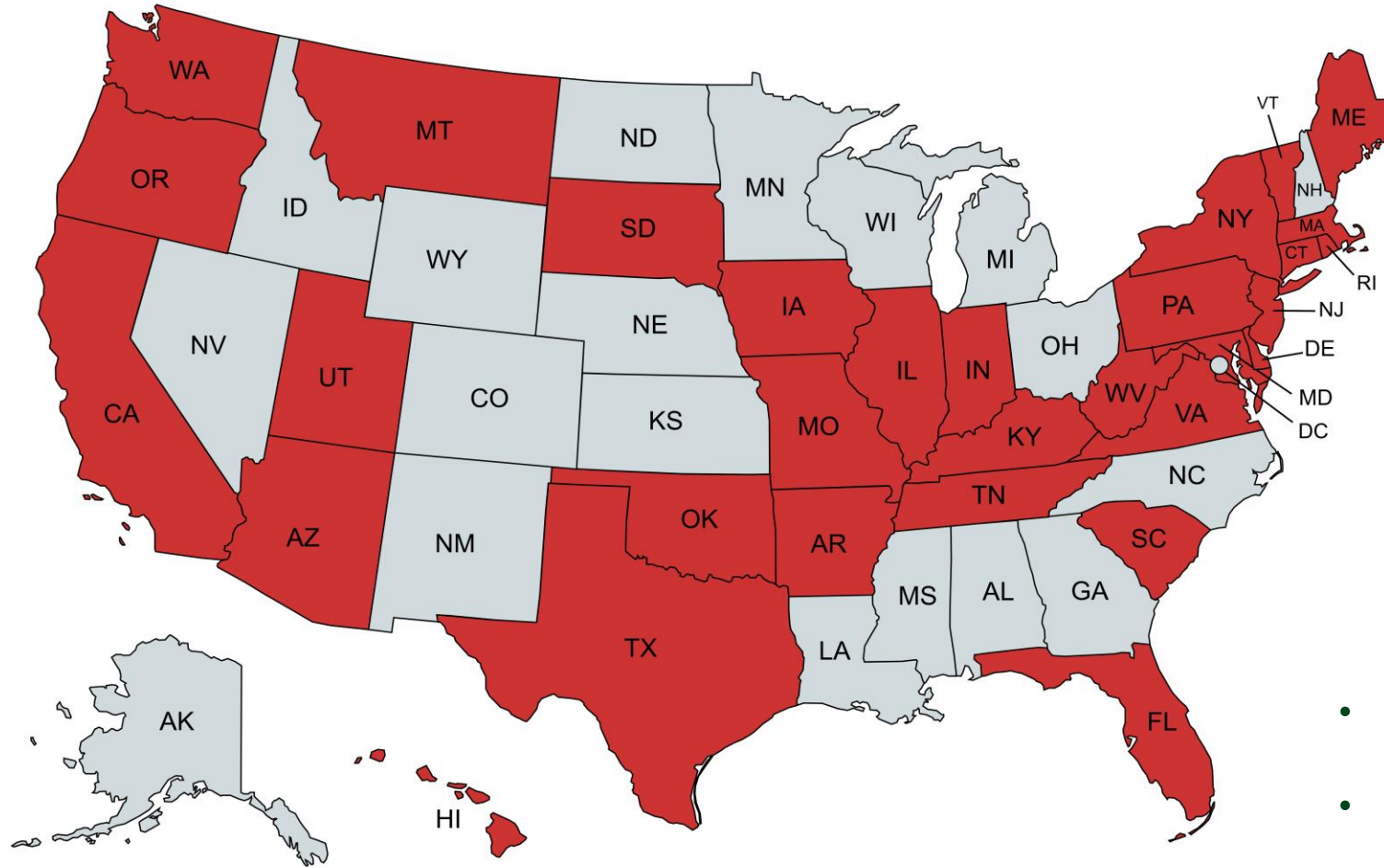
Global Food Regulations Are Divergent and Complex



US F&B Regulations – More than the FDA



Proposed and Enacted US State Level Legislation Targeting F&B



- As of March 2025 ~ 82 bills of concern- but changing rapidly.
- SNAP restrictions would include more states.
- Texas has the highest number of bills.

Created with mapchart.net

Examples of Proposed Bills and Enacted State Laws

Food Technology Bans

- Florida & Alabama have formally banned cell cultured meat.
- Proposed Bills in Arizona, Kentucky, and Tennessee
- Criminal penalties for selling cultivated meat



New Food Magazine Nov 2021

Ingredient Bans

- Brominated vegetable oil, potassium bromate, propylparaben, Red #3 – CA, IL, MO, SD, WA, MD, NJ, NY, RI, WV

INGREDIENTS: CORN, VEGETABLE OIL (CORN, CANOLA, AND/OR SUNFLOWER OIL), SALT, CORN STARCH, TOMATO POWDER, LACTOSE, WHEY, SKIM MILK, ONION POWDER, SUGAR, GARLIC POWDER, MONOSODIUM GLUTAMATE, MALTODEXTRIN (MADE FROM CORN), CHEDDAR CHEESE (MILK, CHEESE CULTURES, SALT, ENZYMES), DEXTROSE, MALIC ACID, CORN SYRUP SOLIDS, BUTTERMILK, NATURAL AND ARTIFICIAL FLAVORS, SODIUM ACETATE, ARTIFICIAL COLOR (RED 40, BLUE 1, YELLOW 5), SPICE, CITRIC ACID, DISODIUM INOSINATE, AND DISODIUM GUANYLATE.
CONTAINS MILK INGREDIENTS.

Category Exclusions and Labeling Restrictions

- Only natural fats and oils in school lunches and no artificial ingredients – IA
- Required warning labels for ingredients banned in Canada, EU/UK, or Australia and allowed by US - TX
- No ultra processed foods in schools – AZ/CA
- SNAP Restrictions - Many

But Wait... There is more..



- NY state requirements for Generally Recognized As Safe (GRAS) substances in addition to existing federal requirements
- Creates a state level self-GRAS reporting requirement into a publicly available database



- NJ State followed NY in general
- Creates a state level self-GRAS reporting requirement into a publicly available database
- Similar by slight differences in bill

In March 2025, HHS Secretary Kennedy Jr. directed the US FDA to explore potential rulemaking on GRAS and eliminate self-GRAS.

State by State Patchwork of F&B Regulations??But we've seen this before.



Historical Perspective BE/GMO Labeling

- FDA (2001) – Guidance for Industry: Voluntary Labeling Indicating Whether Foods Have or Have Not Been Developed Using Bioengineering; Draft Guidance
- California (2012) – Proposition 37 requiring genetically engineered foods sold in CA to be labeled, failed to pass
- US (2013) – By the end of the year, there were 26 states where a GMO labeling bill had been introduced.
- Lots of activity here.....
- US (2016) – National Bioengineered Food Disclosure Law – Federal Preemption



Congress Just Passed A GMO Labeling Bill. Nobody's Super Happy About It

JULY 14, 2016 · 5:34 PM ET

HEARD ON ALL THINGS CONSIDERED

By Dan Charles



2-Minute Listen

+ PLAYLIST

TRANSCRIPT



NPR

What Does This All Mean? How Does Industry Comply?



Generated by Microsoft Copilot

Will state specific formulas and SKUs become a reality?

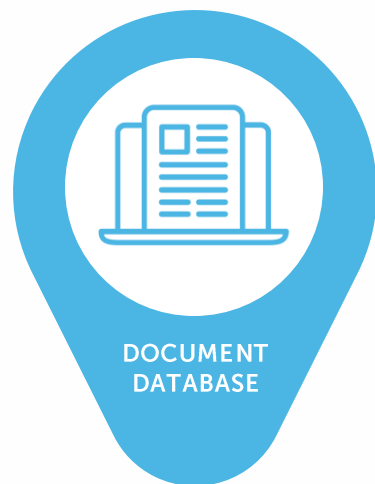


Will the existing F&B regulatory framework change?



Are there food products that simply will not be available anymore?

Trace One Regulatory Compliance ecosystem



DOCUMENT
DATABASE

Real-time global regulation monitoring

- Food News Monitoring System (FNMS)
- Food Law Library (FLL)

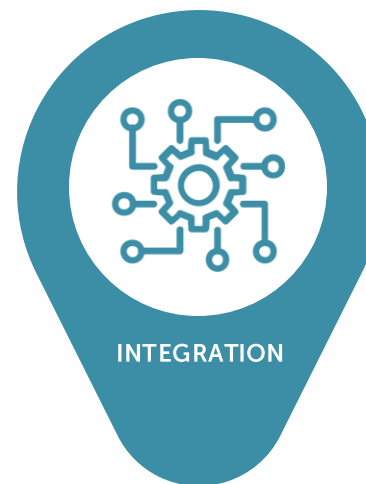
130k Food News
74k Food Laws
>300 monitored sites
Translation into English



SUBSTANCE
DATABASE

REGDATA® compliance assessment tool

80+ Horizontal Regulations
> 400 guidelines
> 2 million limits
Integration with local IT system



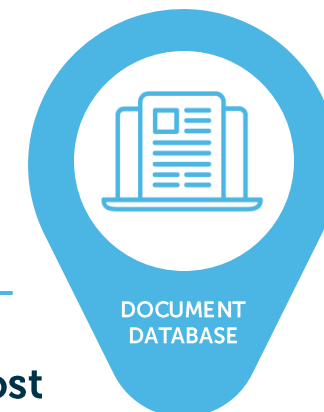
INTEGRATION

Integration into your NPD processes

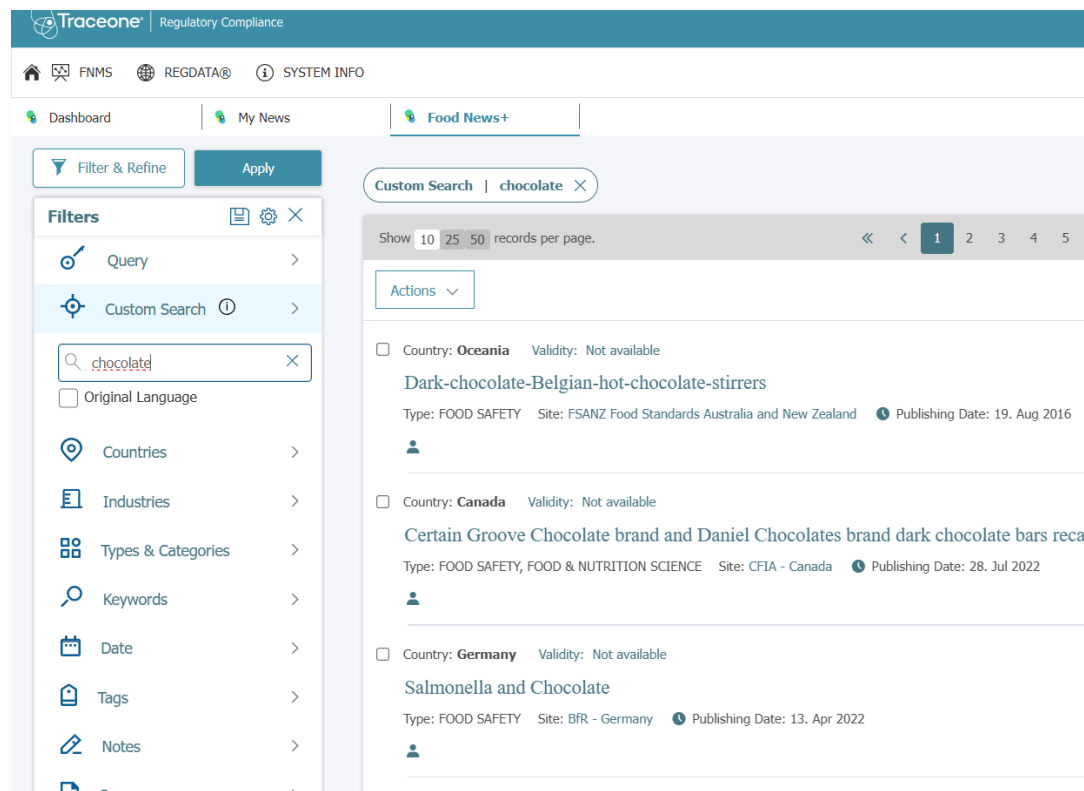
Additive
Pesticides
Contaminants
Labeling
Automated compliance assessment



Food News Monitoring System (FNMS) & Food Law Library (FLL)



DOCUMENT
DATABASE



Aggregate the news that matters most

Scan global food manufacturing websites, legislative sources, and authorities.

Customize regulatory queries and alerts

Set email alerts for news, recalls, and safety updates.

Access regulatory documentation

Centralized repository for critical regulatory compliance documents.

What Next?

- Industry should support and advocate for **federal pre-emption** with regards to the regulation of food ingredients. From a logistical perspective, consider how a 50-state patchwork of laws will create challenges in compliance, costs, and ultimately **higher prices for the consumer**.
- Continue to track developments by state. **Employ digital solutions to aid in compliance at the state level**. Meet and educate lawmakers.
- Support the mission of the **US FDA**, including appropriations for pre- and post-market activities.
- Continue to **support sound science and transparency**. Engage with organizations that champion **public/private partnerships**.



