



Regulatory Outlook 2027:

*What Food, Beverage
& Supplement
Companies Should
Watch Now*

June 30, 2026



Housekeeping Items



Submit your questions in the Questions control panel



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There will be a brief survey at the end of the webinar



Trustwell 

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Manager, Regulatory Team

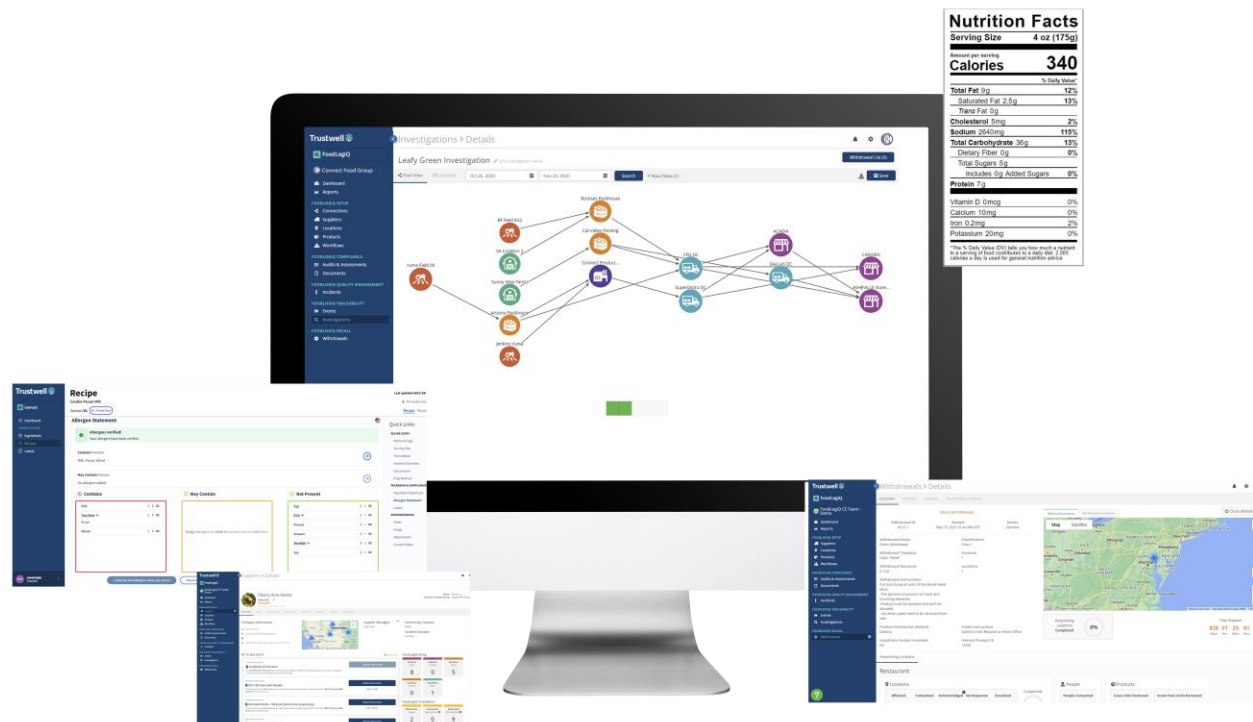
MPH, RD, LDN

Disclaimer

This information is provided as a guide and as a tool to help you work. It is not a substitute for legal advice. Each manufacturer is responsible for their product, and regulations change from time to time. It is up to you to be sure that your specific product label meets the current guidelines.

Today's Agenda

- Our Vision and Commitment
- Present Regulatory News & Discuss Submitted Questions
- Wrap Up



Our Commitment to Our Customers

Purposeful Partnership, Passionate People, Powerful Product

Trustwell is committed to providing industry-leading expertise combined with the highest standards of products and services to ensure our customers are truly successful in achieving their goals. To that end, we commit to our customers that we will:



Align with you on your definition of success, and empower you to leverage the people, tools, and resources made available in order to exceed your expectations.



Deliver reliable, high-quality, easy-to-use solutions driven consistently by being ahead of the curve in industry best practices.



Actively seek input and collaborate with you on how we can improve.



Build a partnership with you based on open and honest communication with the ultimate goal of being your most trusted partner.



US Top News

Trump Administration Publishes Spring 2025 Unified Agenda

- The Trump Administration published the [HHS](#) and [USDA Spring 2025 Unified Agenda of Federal Regulatory and Deregulatory Actions](#). This is a semiannual compilation of information about regulations under development by federal agencies with estimated timelines of when they hope to issue each action in the near and long term. Below is a list of a few notable HHS and USDA regulatory items with updated estimated dates of action.

2025	2026 Status
Spring Agenda 2025 published September 24, 2025	Waiting for new agenda
Front-of-Package Nutrition Labeling - FDA Final Rule - 5/2026	On hold per FDA
Substances Generally Recognized as Safe - FDA Proposed Rule - 10/2025	No news
Rulemaking to Provide by Regulation that an Ingredient Is Not Excluded From the Dietary Supplement Definition – Proposed Rule 01/2026	No news
Revision of the Nutrition Facts Labels for Meat and Poultry Products and Updating Certain Reference Amounts Customarily Consumed - USDA Final Rule - 01/00/2026	No news
National Bioengineered Food Disclosure Standard; Update of the List of Bioengineered Foods - USDA Proposed Rule - 4/2026	No news
National Bioengineered Food Disclosure Standard; Text Message Disclosures - USDA Proposed Rule - 12/2025	No news



US Top News: FDA

Human Foods Program 2026 Priority Deliverables (01/23/2026)

Title of Guidance	Category
Front-of-Package (FOP) Nutrition Labeling	Nutrition
“Healthy” Claim Implementation	Nutrition
Food Labeling for Online Grocery Shopping (Guidance document TBD)	Nutrition
Added Sugar Reduction	Nutrition
Ultra-processed Foods	Nutrition
Guidelines on Direct Marketing of Certain Foods to Children	Food Chemical Safety
Dietary Supplement Oversight Modernization/Regulation of New Dietary Ingredients	Food Chemical Safety
Guidelines for Caffeine Labeling	Food Chemical Safety
Allergen Labeling	Food Chemical Safety
Fresh and Processed Produce Safety	Microbiological Food Safety
Recall Process Modernization	Microbiological Food Safety
Food Traceability The Food Traceability Rule: Questions and Answers; Draft Guidance for Industry (Published February 19, 2026)	Microbiological Food Safety
Tech-enabled Advances in Risk Management	Microbiological Food Safety

Foods Program Guidance Under Development (06/29/2026)

Title of Guidance	Category
Food Labeling for Online Grocery Shopping Platforms; Draft Guidance for Industry	Nutrition
Protein Efficiency Ratio (PER) Rat Bioassay Studies to Demonstrate that a New Infant Formula Supports the Quality Factor of Sufficient Biological Quality of Protein; Guidance for Industry	Nutrition
Labeling Caffeine Content in Foods and Beverages; Draft Guidance for Industry (New!)	Nutrition
Questions and Answers Regarding Use of the “Healthy” Claim (New!)	Nutrition
Action Levels for Cadmium, Arsenic in Food Intended for Babies and Young Children; Draft Guidance for Industry	Food Chemical Safety/Dietary Supplements/Innovation
Action Level for Opiate Alkaloids on Poppy Seeds: Draft Guidance for Industry	Food Chemical Safety/Dietary Supplements/Innovation
Food Colors Derived from Natural Sources: Fruit Juice and Vegetable Juice as Color Additives in Food; Draft Guidance for Industry	Food Chemical Safety/Dietary Supplements/Innovation
Hazard Analysis and Risk-Based Preventive Controls for Human Food; Chapter 12: Preventive Controls for Chemical Hazards	Food Chemical Safety/Dietary Supplements/Innovation
New Dietary Ingredient (NDI) Notifications and Related Issues: Identity and Safety Information About the NDI: Guidance for Industry	Food Chemical Safety/Dietary Supplements/Innovation
Evaluation and Establishment of Safety of Low-Moisture Ready-to-Eat Foods Following Equipment Microbiological Contamination Event; Guidance for Industry	Microbiological Food Safety
Guide to Minimize Food Safety Hazards of Fresh-cut Produce; Guidance for Industry	Microbiological Food Safety
Hazard Analysis and Risk-Based Preventive Controls for Human Food: Chapter 10: Sanitation Program; Draft Guidance for Industry	Microbiological Food Safety
The Accredited Third-Party Certification Program: Questions and Answers; Guidance for Industry	Microbiological Food Safety
The Food Traceability Rule: Questions and Answers; Draft Guidance for Industry (Published February 19, 2026)	Microbiological Food Safety



US Top News: FDA FOP Labeling

Front-of-Pack (FOP) Final Rule

- **Where we are now (2026):**

- FDA was still reviewing comments as of March 2026.
- Dietary Guidelines: FDA leadership expressed they are considering an update to the proposed rule to replace the declaration of Saturated Fat with Fiber, a move that would align with the Dietary Guidelines position to ease up on Saturated Fat restrictions.
- Ultra Processed Foods: The definition under review as of June 2026 could inform a FOP revision in favor of a “red light, green light, yellow light labeling model”
- If there is a change to the proposed FOP scheme, this may require the FDA to conduct consumer research and write a new FOP proposal which would delay a final rule.

- **2026/2027 watchpoints:**

- Possible issuance of FOP final rule aligned with Proposed Rule
- **Most Likely:** Possible issuance of revised Proposed Rule with comment period

Nutrition Info		
Per serving 1 container	% Daily Value	
Saturated Fat	18%	Med
Sodium	37%	High
Added Sugars	5%	Low
FDA.gov		



US Top News: FDA Ultra Processed Foods

Ultra-processed foods (UPF) definition

- **Where we are now (2026):**
 - Request for Information issued in July 2025 to develop a government-wide definition of UPF jointly with USDA.
 - HHS leadership stated a definition is currently waiting for review (at OMB (Office of Management and Budget)(June 2026)
 - **States: Definition, Certifications and Restrictions**
 - California Real Foods, Healthy Kids Act (AB 1264)
 - California Non-Ultra processed Certified Food Standard (AB 2244)
 - Arizona Healthy Schools Act (HB 2164)
 - **3rd Party Certifications**
- **2026/2027 watchpoints:**
 - UPF definition or policy framework.
 - UPF definition informing other policies (FOP)

Currently, there is no single authoritative definition for ultra-processed foods for the U.S. food supply.

NOVA Definition

Ultra Processed Foods (UPF): Coined by Nutrition and Public Health Dept at the University of Sao Paolo in Brazil to describe foods

NOVA Classification

1. Unprocessed or minimally processed foods: Food with not added ingredients like fruit and vegetables
2. Processed ingredients: Added to other foods rather than eaten by themselves, such as salt, sugar and oils.
3. Processed foods: These are foods that are made by combining foods from groups 1 and 2. Include foods such as jam, pickles, tinned fruit and vegetables, homemade breads and cheeses.
4. Ultra-processed foods: Ultra-processed foods typically have five or more ingredients. Include many additives and ingredients that are not typically used in home cooking, such as preservatives, emulsifiers, sweeteners, and artificial colours and flavours. These foods generally have a long shelf life.

Ultra Processed Foods: States

- **Arizona Healthy Schools Act (HB 2164)**
 - Ultra-processed foods contain one or more of the ingredients listed and bans use in items sold in schools.
 - Ingredients: Potassium bromate, Propylparaben, Titanium dioxide, Brominated vegetable oil, Yellow dye 5, 6, Yellow dye 6, Blue dye 1, Blue dye 2, Green dye 3, Red dye 3, Red dye.
- **California Real Foods, Healthy Kids Act (AB 1264)**
 - Certain nutrition parameters and banning certain functional ingredients and nonnutritive sweeteners
 - Not more than 35% Total Fat*
 - Less than 10% of Total Cals from Sat Fat*
 - Not more than 35% of total weight of Sugar including naturally occurring and added*
 - Less than 0.5 grams of Trans Fat
 - Not more than 200 mg of sodium per item
 - Not more than 200 calories per item
 - *some exclusions apply
- **California AB 2244 (Introduced)**
 - If passed, this bill would require, no later than June 1, 2028, to accredit certification agents that can certify products as Non-Ultraprocessed Certified.
 - The bill would require the department to create a specified standardized Non-Ultraprocessed Certified seal.

Non Ultra Processed Foods Verifications/Certifications

- **Non UPF Verified** (from the Non GMO Project organization)
 - Defines clear criteria for determining whether a food is non-ultraprocessed, based on how its ingredients are sourced, processed, and combined.
 - Classifies processing methods as permissible, conditional, or prohibited, ensuring food integrity is maintained.
 - Establishes ingredient restrictions, prohibiting additives and synthetic substances that compromise food quality and health.” [Non-UPF Verified | Discover The Future of Food](#)
- **Non UPF Certified** (from the Non UPF Program)
 - “Each Non-UPF certified product aligns with the Nova framework and has been carefully evaluated by our team of ultra-processed food experts—including researchers, scientists, registered dietitians, policy specialists, food scientists, and healthcare practitioners. Join us in reshaping the food landscape and empowering healthier choices.”
<https://www.nonupfprogram.org/>





US Top News: FDA Healthy Definition

Healthy Definition

- **Where we are now (2026):**
 - Final Rule was published December 27, 2024.
 - FDA extended the Effective Date to April 28, 2025.
 - The compliance date, February 25, 2028, remains.
 - [Human Foods Program 2026 Priority Deliverables | FDA](#) (January 2026):
 - **“Healthy” Claim Implementation:** In 2025, FDA finalized a rule allowing foods that meet certain standards—such as fruits, vegetables, whole grains, and foods low in added sugar and sodium—to voluntarily use the label term “healthy.” The regulation will help consumers build healthier diets and could help encourage manufacturers to produce foods that meet the “healthy” criteria.
 - **In 2026, HFP will assess whether changes to the “healthy” claim are necessary to align with the 2025-2030 Dietary Guidelines for Americans and continue work to implement the updated criteria, including by advancing a potential guidance that identifies a symbol to depict the “healthy” claim.”**
 - The Healthy food group equivalents does not align with the Dietary Guidelines new recommended serving amounts.
 - The limits for saturated fat may not align with DGA’s approach to Saturated Fats.
- **2026/2027 watchpoints:**
 - Guidance Document: Questions and Answers Regarding Use of the “Healthy” Claim (**New!**)
 - Communication from the FDA indicating that the Final Rule stands or a revision to align with the Dietary Guidelines.



Dietary Supplements

Dietary Supplement Regulatory News

FDA announces enforcement discretion for DSHEA disclaimer

- FDA will not enforce a provision of [21 CFR 101.93\(d\)](#). This regulation has required the DSHEA disclaimer to appear on **each panel** or page where a structure function claim is made. Now just once is sufficient.
 - “This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease”
- All other requirements in 101.93 will still be enforced.
- See the [FDA's published letter to industry](#).
- Litigation, however, continues.

Supreme Court to review New York’s law prohibiting certain supplements marketed to minors

- CRN (Council for Responsible Nutrition) has petitioned the U.S. Supreme Court to review a New York law restricting the sale of weight loss and muscle building dietary supplements to minors.
- The challenge is based solely on how those products are labeled or marketed, arguing the law is a content-based infringement on speech and is wholly different than laws that limit the sales of products based on their ingredients or demonstrated harm.

Dietary Supplements & the Human Food Program Priorities 2026

Regulation of New Dietary Ingredients

- FDA held a public meeting in March, Exploring the Scope of Dietary Ingredients to discuss GRAS determination and the definition of "dietary substance" as described in the 1994 law, DSHEA.
- The FDA has rejected many New Dietary Ingredient Notification because the ingredients were ineligible as they are not "dietary substances."
- The dietary supplement industry counters that FDA's interpretation of "dietary substance" is too narrow and doesn't reflect the intention of lawmakers. In response, industry has been doing "self-GRAS", which critics say is endangering the public with potentially unsafe ingredients.
- FDA is weighing the feedback and is expected to deliver clear and actionable guidance and transparent administrative procedures, perhaps this year.

Dietary Supplement Oversight Modernization

- FDA may collaborate with third-party / private GMP auditing companies to share data such as how frequently a company has been audited, where a company's sites are currently located, and to consider fit-for-purpose procedures.
- FDA is already in a pilot program using a risk-based approach to inspections to give inspectors flexibility to conduct quicker reviews, thus move on to the next company to complete more inspections over time.

Federal Dietary Supplement Legislation

Status / Date	Bill	Description	Sponsor(s)
Introduced January 15, 2026 <i>Referred to the Committee on Health, Education, Labor, and Pensions</i>	Dietary Supplement Listing Act of 2026, S. 3677	To improve transparency and the availability of information regarding dietary supplements by amending the Federal Food, Drug, and Cosmetic Act to require manufacturers of dietary supplements to list dietary supplements with the Food and Drug Administration.	Sen. Dick Durbin (D-IL)
Introduced February 4, 2026 <i>Referred to the House Committee on Energy and Commerce</i>	The Dietary Supplement Regulatory Uniformity Act, H.R. 7366	Aims to strengthen FDA authority by preempting state-level regulations that differ from federal standards. It seeks to prevent a "patchwork" of state rules regarding safety, labeling, and marketing, establishing a uniform national standard.	Rep. Nick Langworthy (R-NY-23)
Introduced April 20, 2026 <i>Referred to the House Committee on Energy and Commerce</i>	The Dietary Supplement Listing Act, H.R. 8370	To improve transparency and the availability of information regarding dietary supplements by amending the Federal Food, Drug, and Cosmetic Act to require manufacturers of dietary supplements to list dietary supplements with the Food and Drug Administration.	Rep. Maxine Dexter (D-OR-3)



US Top News: FDA GRAS

GRAS modernization

Where we are now (2026):

- December 2025, Proposed Rule under review at the Office of Management and Budget (OMB).
- “In 2026, FDA will publish a proposed regulation to require the submission to FDA of GRAS notices for all new substances claimed to be GRAS.” [Human Foods Program 2026 Priority Deliverables | FDA](#)
- State bills introduced covering GRAS disclosures and/or reporting:
 - New York: Food Safety and Chemical Disclosure Act, S.1239 / A.1556
 - California AB 2034
 - New Jersey S.3277
 - Pennsylvania SB 820

2026/2027 watchpoints:

- Potential GRAS notice of proposed rulemaking..
- What will change in the current process: mandatory submissions vs. smaller tweaks

<https://www.reginfo.gov/>

List of Regulatory Actions Currently Under Review			
(Agency: ALL; Rule Stage: ALL; Length of Review: ALL; Economically Significant: ALL; International Impact: ALL)			
AGENCY: HHS-FDA	RIN: 0910-AJ02	Status: Pending Review for rule 0910-AJ02	REQUEST FOR COMMENT on rule 0910-AJ02
TITLE: Substances Generally Recognized as Safe			
STAGE: Proposed Rule			
RECEIVED DATE: 12/01/2025			
	ECONOMICALLY SIGNIFICANT: No		
	LEGAL DEADLINE: None		



US Top News: FDA Chemical Safety

Food Chemical Safety

Where we are now (2026):

- Post Market review of Food Chemicals
 - “In 2026, HFP will continue reassessments of chemicals used in food, starting with safety reviews of those that are most concerning to consumers, e.g., phthalates, propylparaben, butylated hydroxyanisole (BHA), and butylated hydroxytoluene (BHT), among others.”
 - Finalizes Food Chemical Safety Post-Market Assessment Program (May 2026)
 - Launches Reassessment of BHT, ADA (May 2026)

2026/2027 watchpoints:

- Results from BHT, ADA assessments and changes to allowed usage.
- Subsequent Requests for Information and reassessment from other chemicals on the review list.

[List of Select Chemicals in the Food Supply Under FDA Review](#)

Launches Reassessment of BHT, ADA

- The FDA launched reassessments of butylated hydroxytoluene (BHT) and azodicarbonamide (ADA), chemical additives commonly used in a variety of food products.
- As part of this reassessment, the agency issued two requests for information regarding the use and safety of these chemicals in food.
 - BHT is used to prevent spoilage of fats and oils and can be found in various food products including breakfast cereals, frozen pizza, frozen meals, baking mixes, cookies, chewing gum, and meat products.
 - BHT is allowed for use globally subject to limits. States: Louisiana (banned/01/01/28), Texas (Warning Statement/01/01/27).
 - ADA is used as a whitening agent in cereal flour and as a dough conditioner in breadmaking and has applications in manufacturing food contact materials.
 - ADA is not allowed for use in Europe, UK, AZ/NZ. States: Louisiana (banned/01/01/28), Texas (Warning Statement/01/01/27).

[FDA Finalizes Food Chemical Safety Post-Market Assessment Program, Launches Reassessment of BHT, ADA](#)

FDA Finalizes Food Chemical Safety Post-Market Assessment Program

Finalizes Food Chemical Safety Post-Market Assessment Program

- Two documents will guide the FDA's annual food chemical post-market assessment plan. The first, "[Enhanced Systematic Process for Post-Market Assessment of Chemicals in Food](#)," describes how the FDA will monitor and triage signals that provide information on hazards, use, or exposure related to food chemicals, then prioritize for assessment, evaluate, and manage these chemicals in the food supply.
- The second document, "[Post-Market Assessment Prioritization Tool](#)," helps identify priority food chemicals for full scientific assessment by focusing on potential risk to public health.



US Top News: USDA

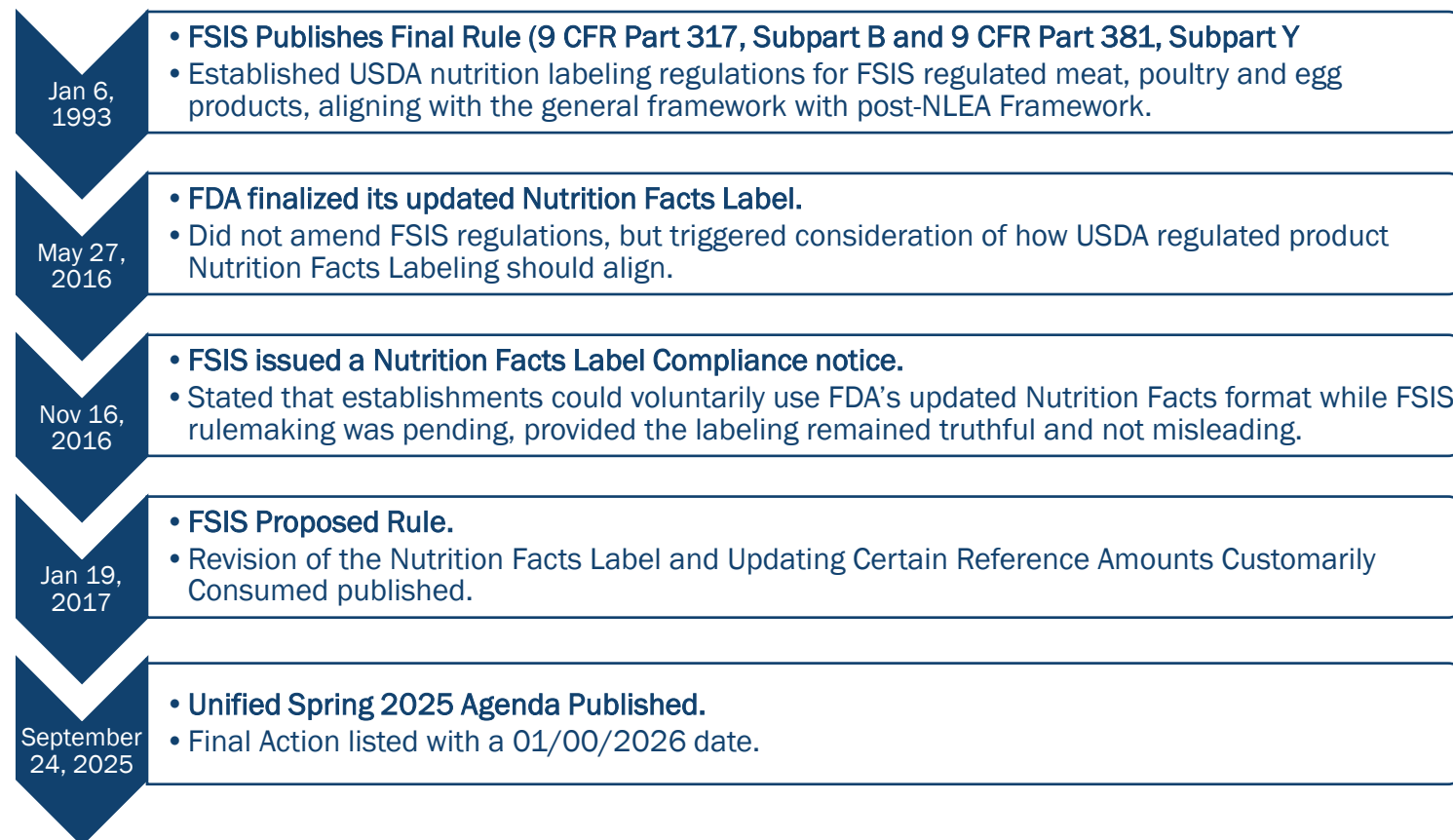


USDA/FSIS Label Revisions

USDA Updated Nutrition Facts Label

Where we are now (2026):

- Unified Spring 2025 Agenda Published. Final Action listed with a 01/00/2026 date.



2026/27 watchpoints:

- News from USDA on the topic and potential final action



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USDA/FSIS

RIN: 0583-AD56

Publication ID: Spring 2025

Title: Revision of the Nutrition Facts Labels for Meat and Poultry Products and Updating Certain Reference Amounts Customarily Consumed

Abstract:

Consistent with the changes that the Food and Drug Administration (FDA) finalized, the Food Safety and Inspection Service (FSIS) is amending the Federal meat and poultry products inspection regulations to update and revise the nutrition labeling requirements for meat and poultry products to reflect recent scientific research and dietary recommendations and to improve the presentation of nutrition information to assist consumers in maintaining healthy dietary practices.

Agency: Department of Agriculture(USDA)

Priority: Other Significant

RIN Status: Previously published in the Unified Agenda

Agenda Stage of Rulemaking: Final Rule Stage

Major: No

Unfunded Mandates: No

EO 14192 Designation: Regulatory

CFR Citation: [9 CFR 317](#) [9 CFR 381](#) [9 CFR 413](#)

Legal Authority: [21 U.S.C. 601 et seq.](#) [21 U.S.C. 451 et seq.](#)

Legal Deadline: None

Timetable:

Action	Date	FR Cite
NPRM	01/19/2017	82 FR 6732
NPRM Comment Period End	04/19/2017	
Final Action	01/00/2026	

<https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=0583-AD56>



Dietary Guidelines

Dietary Guidelines for Americans (DGAs) 2025–2030



Where we are now (2026):

- Dietary guidelines 2025-2030 Published in January 2026.
 - MyPlate has been replaced with the “New Pyramid” and recommendations are provided by [Daily Servings by Calorie Level](#). Daily serving sizes not aligned with MyPlate and missing food types.
 - In addition to recommended daily servings for food groups, there is an added sugar limit per Food Group that aligns with the Healthy Claim. However, the Healthy claim uses the term “equivalents” for tracking.
 - The New Pyramid has the addition of the Healthy Fat category.
- Implications to Healthy definition and FOP Final Rule

2026/27 watchpoints:

- Publishing of supplemental information to fully document daily servings sizes and other considerations
- Implications to Healthy Definition and FOP



Congress

H.R. 9048 Celiac Safety Act of 2026

- Introduced to amend the Federal Food, Drug, and Cosmetic Act to include gluten-containing grains in the definition of a major food allergen.
- The legislation would require any product containing the following “gluten-containing grains” as a major allergen:
 - Wheat, including any species belonging to the genus *Triticum*
 - Rye, including any species belonging to the genus *Secale*
 - Barley, including any species belonging to the genus *Hordeum*
- The Celiac Safety Act is the first legislative proposal to require FDA to mandate the inclusion of gluten-containing grains as a major food allergen.
- The legislation is endorsed by the Celiac Disease Foundation, American Gastroenterological Association, and Society for the Study of Celiac Disease.



US Top News: States

State	Bill/Act	Ingredients	Regulation	Effective/Compliance Date
Alaska	SB 187	Red Dye 3, Red Dye 40, Blue Dye 1, Blue Dye 2, Yellow Dye 5, Yellow Dye 6, and Green Dye 3	Ban in items sold in schools	January 1, 2028
Arizona	Arizona Healthy Schools Act (HB 2164)	Potassium Bromate, Propylparaben, Titanium Oxide, Brominated Vegetable Oil, Yellow Dye 5&6, Blue Dye 1&2, Green Dye 3, Red Dye3 &40.	Creates definition ultra-processed foods containing one or more of the ingredients listed and bans use in items sold in schools.	2026-27 School Year
Arkansas	Make Arkansas Healthy Again Act (SB9/Act 22)	Potassium bromate and propylparaben	Ban in items sold in the state.	January 1, 2028
California	California Food Safety Act (AB 418)	Brominated Vegetable Oil, Potassium Bromate, Propylparaben, Red Dye 3	Ban in items sold in the state.	January 1, 2027
California	Pupil Nutrition Act/California Food Safety Act (AB 2316)	Red Dye 40, Yellow Dye 5 &6, Blue Dye 1 & 2, Green Dye 3. With certain nutrition and food group requirements.	Ban in items sold in schools	December 31, 2027
California	Real Foods, Healthy Kids Act (AB 1264)	Ultraprocessed food definition: certain nutrition parameters and banning certain functional ingredients and nonnutritive sweeteners	Bans items sold in schools.	Begin July 1, 2029 and end July 1, 2025
Delaware	SB 69	Red Dye 40	Ban in items sold in schools	July 1, 2026
Louisiana	SB 14/Act 463	Ban in Schools: 15 ingredients Warning statement: 44 ingredients Menu labeling: seed oils	Bans certain ingredients for items sold in schools, all other foods require a warning label, warning disclosure for seed oils in restaurants. Warning amended to only if US FDA requires the ingredient to be named on a food label.	2026-27 School Year/ January 1, 2028
Nebraska	LB 940	Blue No.1, Blue No. 2, Green No. 3, Red No. 40, Yellow No. 5, and Yellow No. 6.	Ban in items sold in schools	August 1, 2027
Tennessee	HB 0134/SB 0476 HB 1853/SB 2423	Red Dye 40 Red Dye 3, Yellow Dye 3, Yellow Dye 6, Blue Dye 1, Blue Dye 2, Green Dye 3	Ban in items sold in schools	August 1, 2027

State	Bill/Act	Ingredients	Regulation	Effective/Compliance Date
Texas	Make Texas Healthy Again (SB 25)	44 ingredients require a warning label on package	Warning label required for items sold in state.	January 1, 2027 *Temporarily blocked by lawsuit
Texas	(SB 314)	Brominated Vegetable Oil, Potassium Bromate, Propylparaben, Azodicarbonamide, Butylated Hydroxyanisole, Blue Dye 1&2, Green Dye 3, Red Dye 3 & 40, Yellow Dye 5&6, Citrus Red 3, Orange B, INS No. 150c/ammonia caramel, INS No. 150d/sulfite ammonia caramel, Titanium Dioxide, any additive similar to an additive listed in the Act	Prohibits certain food additives from being included in free or reduced-price meals provided by school districts.	2026-27 School Year
Utah	HB 402	Potassium Bromate, Propylparaben, Blue Dye 1&2, Green Dye 3, Red Dye 3 & 40, Yellow Dye 5&6	Ban in items sold in schools	2026-27 School Year
Virginia	HB 1910/SB 1289	Blue Dye 1&2, Green Dye 3, Red Dye 3 & 40, Yellow Dye 5&6	Ban in items sold in schools	July 1, 2027
West Virginia	HB 2354	Ban in schools: Blue Dye 1&2, Green Dye 3, Red Dye 3 & 40, Yellow Dye 5&6 Rest of state: butylated hydroxyanisole, propylparaben, Blue Dye 1&2, Green Dye 3, Red Dye 3 & 40, Yellow Dye 5&6	Ban in items sold in schools Ban in items sold in state.	January 1, 2028 *Temporarily blocked by lawsuit

States: Bills in Progress

Additive/Ingredient Restrictions

- Alabama, Alaska, Arizona, Arkansas, Connecticut, Delaware, Indiana, Florida, Georgia, Hawaii, Illinois, Iowa, Kansas, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Vermont, Washington, West Virginia, Wisconsin.

Cell Cultivated Restrictions

- Missouri, South Dakota, West Virginia

Product Date Labeling

- Maryland, New Jersey, New York

Front of Pack Labeling

- Missouri

Dietary Supplement Labeling

- Virginia

Chemicals/Toxic Metals

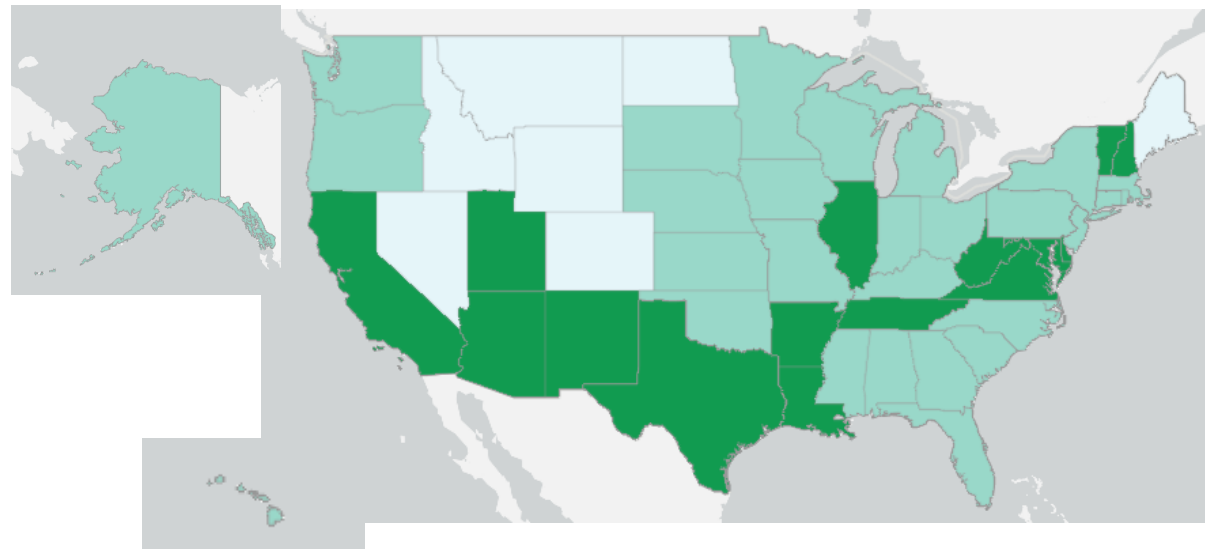
- Connecticut, Hawaii, Missouri, New York, Pennsylvania, Tennessee, Vermont, Wisconsin

Standard of Identity/Claims

- Alabama

Restaurant Menu Labeling

- Maryland



Source: EWG's Food Chemical Policy Map

No active bills: Colorado, Idaho, Montana, Nevada, North Dakota, Wyoming,

California Food Date Labeling AB 660/AB 2779 (Effective 07/01/2026)



Bill Text:

Source: <https://www.cdfa.ca.gov/is/foodrecovery/fooddatelabeling/>

“(a) On and after July 1, 2026, a food manufacturer, processor, or retailer responsible for the **labeling of food items for human consumption** that chooses, or is otherwise required by law, to display a date label to communicate a quality or safety date on a food item manufactured on or after July 1, 2026, shall use one of the following uniform terms on the date label:

- (1) “BEST if Used by” or “BEST if Used or Frozen by” to indicate the quality date of the food item.
- (2) “USE by” or “USE by or Freeze by” to indicate the safety date of the food item.”

AB 2779

- (4) Notwithstanding subdivisions (a) and (b), on and after July 1, 2026, a grocery store may display a label with the phrase “packed on” on a prepared food item and may sell or offer for sale in the state the prepared food item with that label if the prepared food item also displays a quality or safety date label in accordance with subdivision (a).



Global Top News: Canada

Where we are now (2026):

- [Health Canada 2026 to 2028 Forward Regulatory Plan - Canada.ca](#)

Food and Drugs Act

Expand all Hide all

- ▶ Regulatory modernization of foods for special dietary use and infant foods: Divisions 24 and 25 of the Food and Drug Regulations
- ▶ Ministerial Exemption Order to permit continued supply of naloxone kits on the Canadian market
- ▶ Reducing Red Tape For Natural Health Products
- ▶ Reducing Red Tape for Non-Prescription Drugs
- ▶ Reliance Order – Drugs
- ▶ Reliance Order – Medical Devices
- ▶ Simplifying Part C of the Food and Drug Regulations
- ▶ Clinical Trials Modernization - Drugs
- ▶ Modernizing the Medical Device Establishment Licensing (MDEL) Framework (Phase 2)
- ▶ Modernizing the Drug Establishment Licensing (DEL) Framework (Phase 2)
- ▶ Amendments to the Food and Drug Regulations - Outsourced Drug Preparation (formerly Commercial Compounding)
- ▶ Regulations Amending Certain Regulations Made Under the Food and Drugs Act (Shortages and Discontinuation of Sale of Drugs and Medical Devices)

2026/27 watchpoints:

- Adjustments or Updates to the Plan.



Global Top News: EU

European Union Regulations

Where we are now (2026):

- [Revision of the Regulation on Food Information to Consumers](#)
 - As part of the [Farm-to-Fork Strategy](#) (2020), the European Commission announced to revise EU rules on the information provided to consumers proposing to:
 - introduce harmonised **mandatory front-of-pack nutrition labelling** and set **nutrient profiling criteria** to restrict claims made on foods;
 - extend **mandatory origin** or provenance information for certain products;
 - revise the rules on **date marking** ('use by' and 'best before' dates)
 - Follow up on [Europe's Beating Cancer Plan](#) by considering to:
 - introduce **mandatory indications of the list of ingredients** and the **nutrition declaration** for all alcoholic beverages (wine labeling already required)

2026/27 watchpoints:

- News from the EU on the topics and potential final action



Global Top News: UK

Where we are now (2026):

- UK Publishes new Nutrition Profiling Model
- UK Government Launches Consultation on Updated School Food Standards
- The Food Standards Agency sets out plans to modernise food regulatory system

2026/27 watchpoints:

- News from UK on the topics and potential final action

UK Publishes new Nutrition Profiling Model (NPM 2018)

- The UK government has published a new [Nutrition Profiling Model](#) (NPM 2018) used to classify foods and drinks based on their nutritional composition. This NPM is used to calculate a nutrient profile of a product and determine if it is required to adhere to the HFSS regulations (*Restricting promotions of products high in fat, sugar or salt by location and by volume price*) for product placement and advertising. I believe like the US, they still must open it for public comment and then follow the process for adoption
- Current HFSS report is based on the 2004 Nutrition Profiling Model (NPM 2004 to 2005) the new model (NPM 2018) from 2018 recommendations would adjust the calculations.
- At first glance, it appears thresholds in point categories has changed and sodium has been replaced with salt.
- The UK governments stated that this NPM is not yet applied to policy. Its policy application will be consulted in due course.

UK Government Launches Consultation on Updated School Food Standards

- The new standards have been developed alongside nutritionists and public health experts and will apply to all breakfasts and lunches served by schools. 9-week consultation period.
- Plan News:
 - Schools will no longer be able to offer unhealthy ‘grab and go’ options like sausage rolls and pizza every day,
 - Deep fried food will be banned completely.
 - Fruit will also need to be served instead of sugar-laden treats for the majority of the school week.
 - National enforcement mechanism to monitor the new standards and compliance.

Previous	New
Food Group based with a menu plan focused on portions/food groups per week	Food group requirements with nutrient thresholds e.g., breakfast cereal: <5g/100g total sugar



- Full details will be announced this September, with enforcement in place from September 2027.

The Food Standards Agency sets out plans to modernise food regulatory system

- The Future of Food Regulation Programme will develop proposals to strengthen the system that keeps our food safe, to ensure it keeps pace with new and emerging food businesses and reflects how people buy and consume food today.
- **The areas being explored by the programme include:**
 - Enhancing the food business registration system to make it more effective
 - A national approach to regulation for some large businesses, which makes better use of existing data and assurance systems, alongside in-person inspections
 - Improving guidance provided to local authorities and businesses
 - Strengthening enforcement powers where necessary to enable swift, proportionate action where needed
 - Improving consumer information, including making the display of Food Hygiene Ratings mandatory in England, building on the trust of the scheme



Australia/NZ

Where we are now (2026):

- Proposal published April 2026, considering making front of pack labeling mandatory and proposing revisions to the current scheme
- The current Health Star Rating System is voluntary, but lack of adherence is proposing to make it mandatory.

The Food Standards Agency sets out plans to modernise food regulatory system

2026/27 watchpoints:

- News on these topics and potential final action





Mexico

Mexico Regulations

Where we are now (2026):

- Ministry of Health withdraws Red 3 dye from food due to health risk
 - Mexico officially removed Erythrosine and lakes known as Red Dye 3, Red 3 FD&C and Food Red 14 as an approved additive effective May 29, 2026.

2026/27 watchpoints

- Future proposals or regulations



Summing it UP

Preparing for the Future

- Challenges
 - Not one single rule: Overlapping and patchwork labeling
 - Delays: while rule publishing delays are typical, it is difficult to predict drop dates
- Emerging Priorities
 - Federal Level Rules stalled or obsolete due to differing leadership priorities
 - State-driven ingredient warning and additive restrictions
 - Traceability remains a high priority despite delays and companies may underestimate the work

How to Manage Regulatory Compliance

- Set up a regulatory monitoring protocol
 - State level news
 - Industry Trade Groups that may advocate on the industry's behalf
- Track timelines and overlap
 - What compliances dates are sooner?
 - What requirements overlap?
- Build proactive scenario planning
 - Set protocol to document what the product inventory looks like and continue to track as needed
 - Example:Potassium tracked leading up to FDA 2016 Final Rule for labeling. Saved retroactive work.
- Consider a dual strategy and find a balance
 - Monitor and stage updates to avoid wasted compliance cost
 - Treat rescinded laws as early signs of consumer and regulatory momentum

Summing It Up

What to ACT ON	What to CLOSELY WATCH	ON RADAR
UNITED STATES		
Additive Regulations/Recommendations FSMA Recalls	Administration news FDA Front of Pack Labeling New Alcohol Labeling rules (TTB) Ultra-Processed Food definitions New USDA Labelling Rules FDA Definition of Healthy Dietary Supplement/Dietary Ingredients	New Labelling Rules: Food Date and E- Commerce Congress/State Bills Cell Cultivated Food legislation
GLOBAL		
Canada Reference Amounts Canada Supplemented Foods Canada Front of Pack Mexico PHOs Mexico Phase 3	UK Fairer Food Labelling UK HFSS Updates	Cell Cultivated Food legislation Australia/NZ FOP

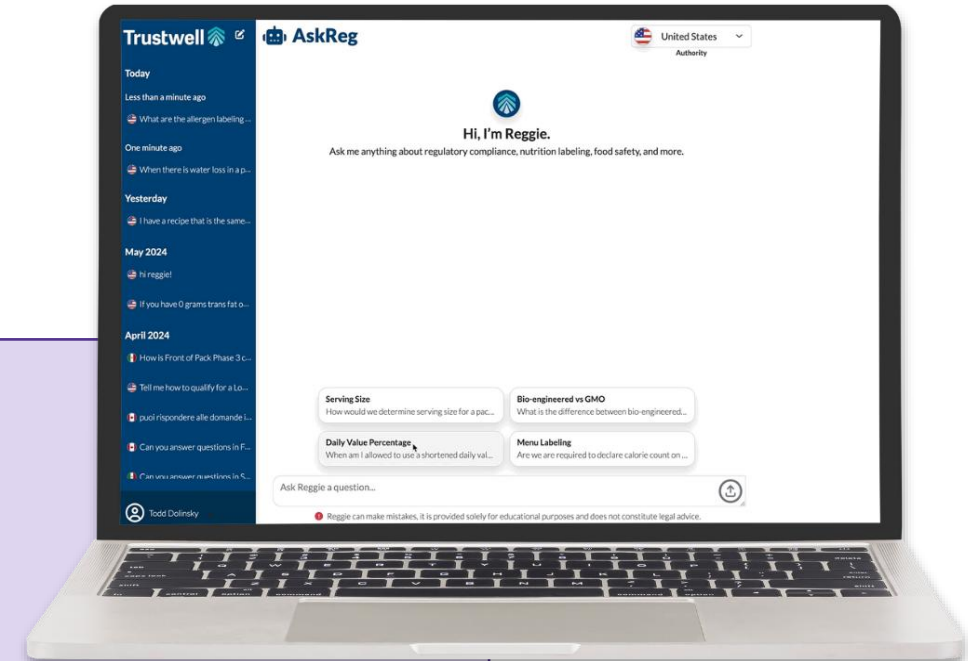


Questions?

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Trustwell Services: Your Partner in Food and Supplement Compliance

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- Regulatory Support
- Software and Regulatory Training
- Onboarding and Implementation Services
- Trustwell Regulatory Seminars

Relevant Resource Links

United States

- [Spring 2025 Unified Agenda of Federal Regulatory and Deregulatory Actions.](#)

FDA

- [Foods Program Guidance Under Development | FDA](#)
- [Foods Program Regulations Under Development | FDA](#)

USDA

- [Eat Real Food](#)

Canada

[Health Canada 2026 to 2028 Forward Regulatory Plan - Canada.ca](#)

EU

- [Revision of the Regulation on Food Information to Consumers](#)

UK

- [Nutrition Profiling Model](#)

Thank You

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