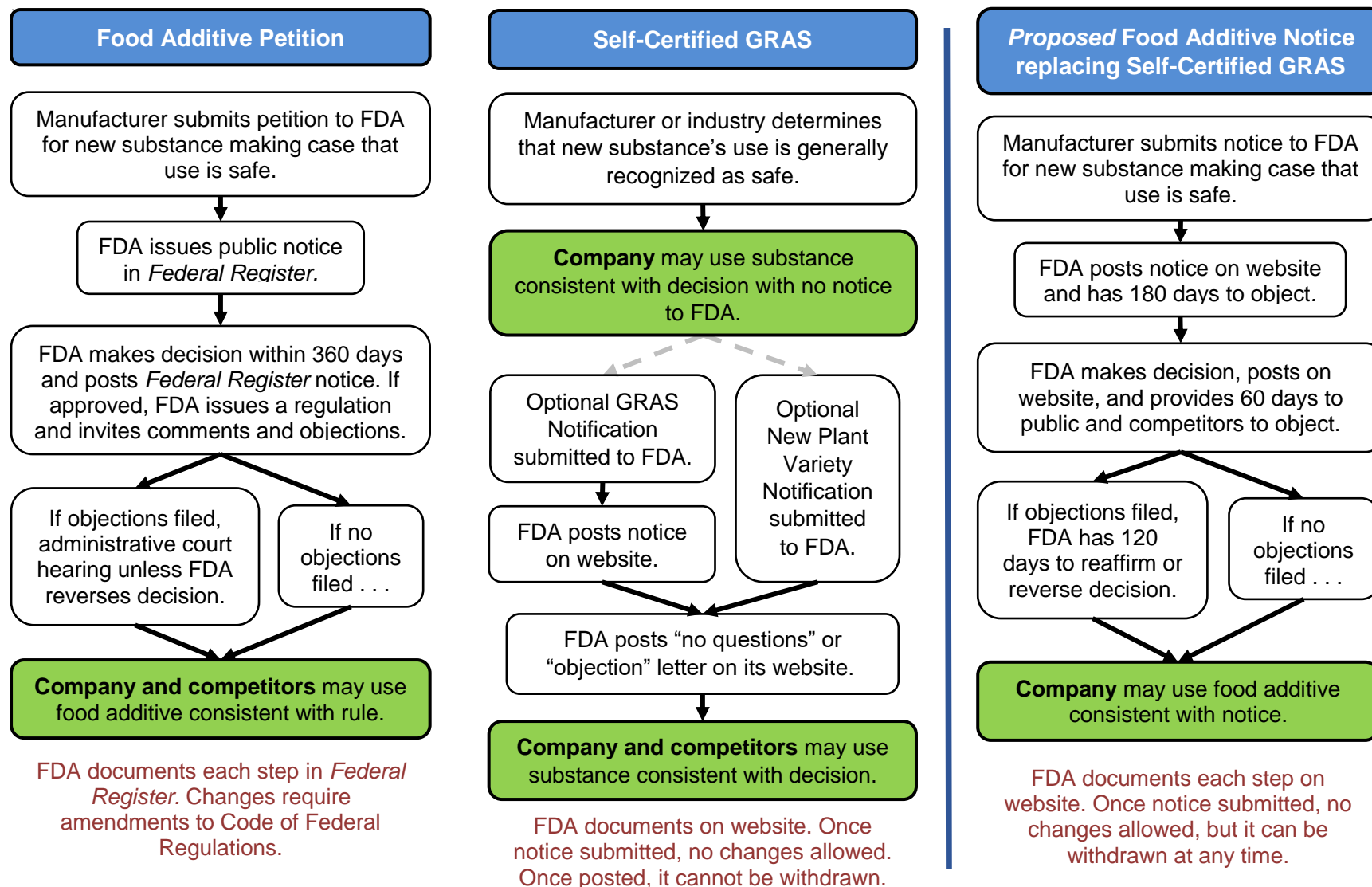


Figure 1 – Two existing paths to market for innovative food additives and ingredients and proposed replacement for self-certified GRAS. Modified from EDF proposal presented at [FDA-ISGP conference](#) on June 25, 2019.



Environmental Defense Fund and others maintain that FDA's GRAS program is contrary to the law and have challenged its GRAS rule in court. This proposal provides an alternative approach Congress could adopt.