

Guide to U.S. GRAS Notification

White Paper Series on Global Novel Food and Feed Ingredient Submissions



U.S. Local Team: Based in Virginia, our U.S. team includes full-time food regulatory and toxicology experts, including 2 DABTs, 1 ERT, and 24 DCSTs. We support clients with U.S. compliance services covering FDA GRAS, NDI, CAP, Animal Food GRAS, FDA AFIC, and AAFCO SRIS.

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Chapter 1: Compliance Pathways for Food Ingredients in the United States

Pursuant to Sections 201(s) and 409 of the U.S. Federal Food, Drug, and Cosmetic Act (FD&C Act), any substance that is intentionally added to food is a food additive, that is subject to premarket review and approval by FDA. Unless qualified experts unanimously agree that the substance is generally recognized as safe (GRAS) under its intended conditions of use, or the substance's use does not fall under the definition of a food additive (for example, substances meeting the definition of pesticides, dietary ingredients in dietary supplements, color additives, new animal drugs, or substances authorized or approved for use prior to September 6, 1958, are excluded from the definition of food additives).

Based on the legal framework above, compliance for new food ingredients in the United States currently follows four primary pathways:

1. Food Additive Petition (FAP)
2. Color Additive Petition (CAP)
3. Generally Recognized as Safe (GRAS)
4. New Dietary Ingredient Notification (NDIN, NDI notification)

The first three pathways apply to conventional food ingredients in the United States, while the NDI notification pathway applies to dietary supplement ingredients, which have their own unique regulatory framework. The main characteristics of these four pathways are as follows:

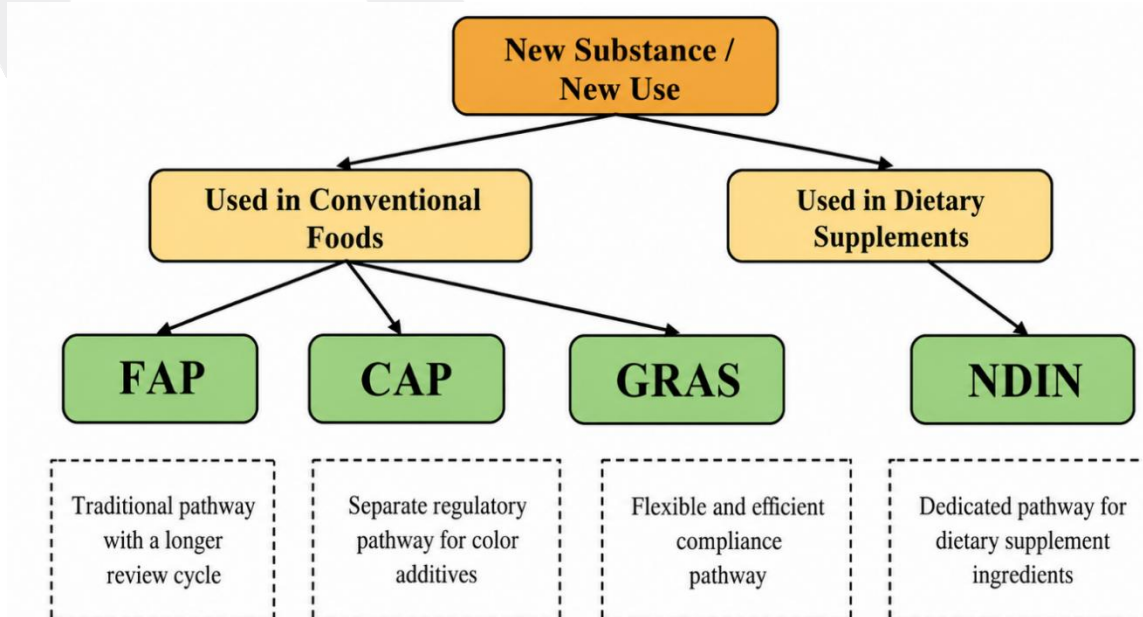


Figure 1-1: Major Compliance Pathways for New Food Ingredients in the United States

Chapter 3: Current Status of FDA GRAS Notifications

3.1 GRAS Notice Database

The U.S. FDA has established the FDA GRAS database to publicly disclose information on GRAS Notices submitted to the FDA. The public can access and search this database. The inventory includes information dating back to the first GRAS notice received by FDA in 1998, including the GRN number, substance information, notifier information, the submitted GRAS dossier, and FDA's response. FDA updates the database approximately once per month.

The screenshot displays the FDA GRAS Notice Inventory website. The top navigation bar includes links to FDA Home, Generally Recognized as Safe, Food Ingredient & Packaging Inventories, and GRAS Notices. The main content area shows a list of GRAS notices with columns for GRN No. (sorted Z-A), Substance, Date of closure, FDA's Letter, Date of add'l correspondence, and Resubmitted as GRN No. Below the list, a detailed view for GRN No. 1299 is shown, including the substance name, intended use, basis, notifier, notifier address, GRAS notice (releasable information), date of closure, and FDA's letter.

GRN No. (sorted Z-A)	Substance	Date of closure	FDA's Letter	Date of add'l correspondence	Resubmitted as GRN No.
1316	<i>Saccharomyces cerevisiae</i> "BY-1574" expressing a gene encoding an alcohol-O-acyltransferase enzyme from <i>Cucumis melo</i> var. <i>Cantalupensis</i>		Pending		
1315	Short-chain chondroitin sulfate oligosaccharides produced from enzymatic hydrolysis of chondroitin sulfate		Pending		
1314	<i>Bacillus pumilus</i> SG154		Pending		
1313	Algal oil (≥35% docosahexaenoic acid) from <i>Schizochytrium limacinum</i> CCAP A2		Pending		
1312	Recombinant αS1-casein from <i>Bos taurus</i> produced by <i>Escherichia coli</i> DSM 35603		Pending		
1311	L-theanine produced by <i>Escherichia coli</i> CICC 11189s		Pending		
1310	Rebaudioside M produced by enzymatic treatment of		Pending		

GRAS Notices

FDA Home Generally Recognized as Safe Food Ingredient & Packaging Inventories GRAS Notices GRN No. 1299

GRN No. 1299
3'-sialyllactose sodium salt produced via fermentation using production strain *Escherichia coli* "SLIS109"

Intended Use: As an ingredient in foods, including infant formula, at the maximum levels shown in Table 1 in the response letter.

Basis: Scientific procedures

Notifier: Synaura Biotechnology (Shanghai) Co., Ltd.

Notifier Address: Building 2, Lane 500, Furong Hua Road, Pudong New Area
Shanghai
CHINA

GRAS Notice (releasable information): GRN 1299 (in PDF) (6.9 MB)

Date of closure: May 13, 2026

FDA's Letter: FDA has no questions (in PDF) (299 kB)

Figure 3-1: Screenshot of a portion of the FDA GRAS Notice Inventory

Reference URL: <https://hfpappexternal.fda.gov/scripts/fdcc/index.cfm?set=GRASNotices>