November 5, 2026

Dockets Management
Food and Drug Administration
5630 Fishers Lane, Rm 1061
Rockville, MD 20852

Cc: Don Prater, Acting Deputy Commissioner for Food

Re: [Docket No. FDA-2025-N-3262]; "Substances Generally Recognized as Safe Notice of Proposed Rule Making"

To Whom it May Concern:

The undersigned members of the Food and Beverage Issue Alliance ("FBIA") are writing to respectfully request an extension to the comment period for the Food and Drug Administration's (FDA) *Substances Generally Recognized as Safe* proposed rule. Specifically, we request that the FDA extend the comment period by 90 days.

FBIA and its forty-eight U.S.-based food and beverage trade associations appreciate the opportunity to provide comments on the proposed rule. Our coalition represents a broad cross-section of the food industry, including manufacturers, ingredient suppliers, retailers, and restaurants whose operations and regulatory obligations would be directly affected by the proposed changes. Member companies differ widely in scale, product categories, and technical capabilities. To submit comments that reflect FBIA members and their member company's operational realities and safety practices, we must engage a broad set of stakeholders.

Given the complexity and scope of the proposed rule, additional time is necessary to provide FDA with the rigorous, data-informed comments the Agency needs to ensure an effective, science-based, and practicable regulatory framework. The proposed rule represents a significant shift in the long-standing GRAS framework. To ensure the agency receives comments that are comprehensive, evidence-based, and useful for decision-making, additional time is essential for stakeholders to evaluate the proposal in depth, consult subject-matter experts, and develop feedback that will meaningfully inform the agency's work.

We respectfully request that FDA allow additional time to submit comments on Substances Generally Recognized as Safe proposed rule. Thank you for your attention to this request. We look forward to continuing our work together to achieve shared goals.

Sincerely,

1. Alliance for Chemical Distribution
2. American Bakers Association
3. American Beverage Association

4. American Herbal Products Association
5. American Spice Trade Association
6. Association for Dressings & Sauces
7. Council for Responsible Nutrition
8. Edible Oil Producers Association
9. Enzyme Technical Association
10. FMI - The Food Industry Association
11. Independent Bakers Association
12. International Dairy Foods Association
13. International Food Additives Council
14. Juice Products Association
15. National Confectioners Association
16. National Oilseed Processors Association
17. National Seafood Association
18. National Seasoning Manufacturers Association
19. North American Millers' Association
20. Peanut and Tree Nut Processors Association
21. Refrigerated Foods Association