

Reformulating America's Menu:

How to Navigate Ingredient Bans in the MAHA Era

As ingredient bans accelerate, the F&B landscape is undergoing a seismic shift — not just from federal agencies, but increasingly from individual states. These local actions are triggering broader national momentum, influencing federal decisions like the Red Dye No. 3 and brominated vegetable oil (BVO) bans, and even pushing conversations about Generally Recognized as Safe (GRAS) reform into the spotlight.

To stay competitive, manufacturers must be ready to reformulate fast — across multiple SKUs and jurisdictions — without sacrificing consumer trust or product quality.

The Demand for Transparency and Healthier Choices

Even as state legislators take the wheel, consumers remain a powerful force behind ingredient reform. They're calling for cleaner ingredients, more nutritious options, clearer labels, and eco-friendly packaging.

64%

of shoppers would change brands if one provides more in-depth product information than the other

80%

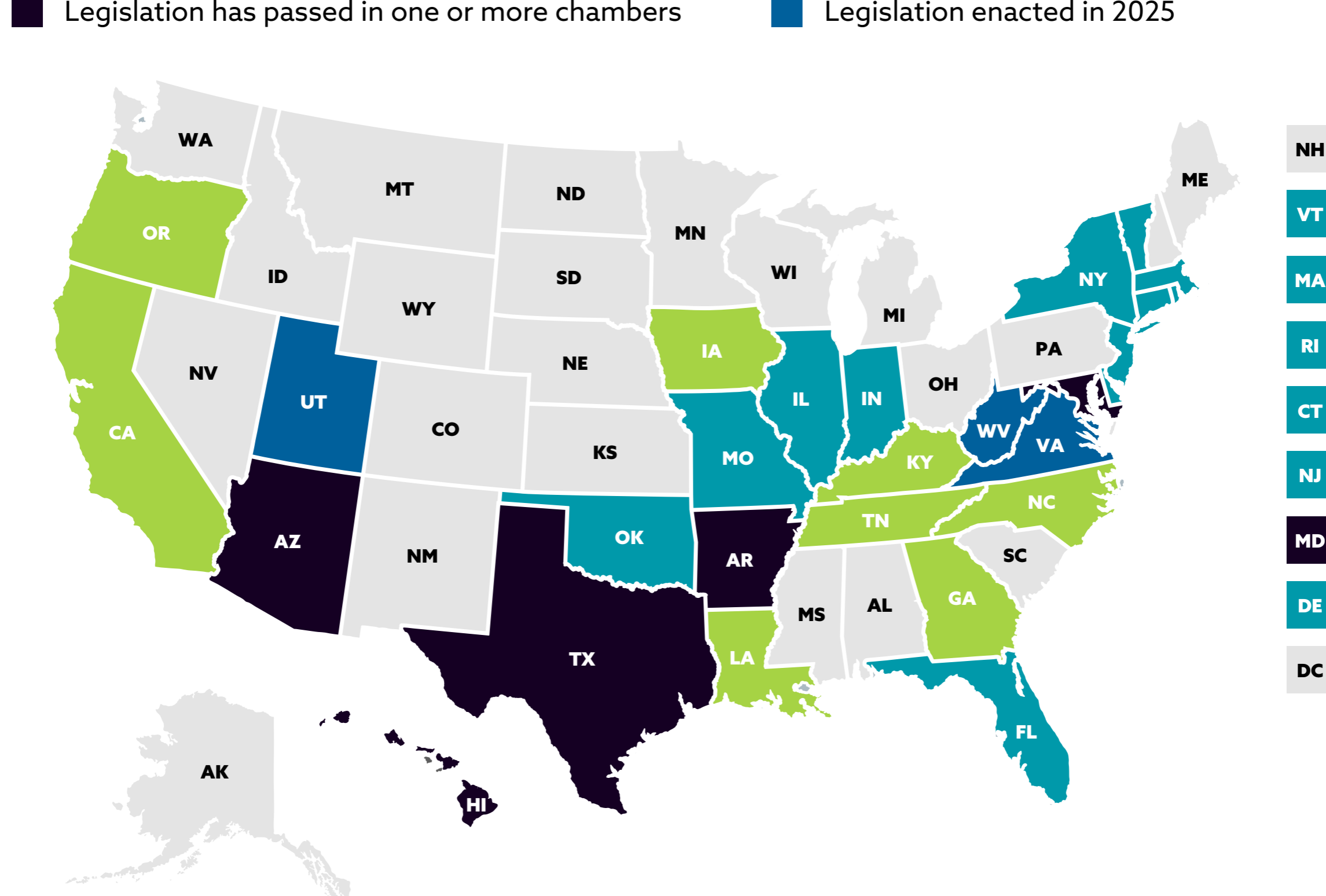
of shoppers are willing to pay more for sustainably produced or sourced goods

44%

of shoppers are checking ingredient and nutrition labels more than they have in the past

Legislation to Restrict Artificial Food Ingredients in 2025

- Statewide bans introduced
- School specific bans introduced
- Legislation has passed in one or more chambers
- Legislation enacted in 2025



Source: MultiState. Data as of 4/2/2025. Note: West Virginia enacted a brand ban on some artificial ingredients. Virginia and Utah both enacted school specific bans. Many of the states colored blue, may also have legislation targeted at schools. States that have passed one or more chambers, could have passed legislation targeting statewide bans or school bans.

What's Being Banned — and Where

Across the U.S., a growing list of ingredients is being taken off the menu. While consumers demand cleaner labels and safer products, it's the Make America Healthy Again (MAHA) Commission that's helping turn those preferences into policy. From red states leading the charge at the state level to federal agencies following suit, the push for reform is coming from all sides — and it's accelerating.

State-Level Momentum

Not long ago, coastal bastions like California and New York were leading the charge on food additive reform. In a surprising shift, that momentum has now shifted to largely red states like Texas, Florida, and Arizona, which are increasingly leading efforts to phase out controversial ingredients— especially in schools and children's products. These local moves are part of a larger MAHA-era shift that reflects deep consumer concern around food safety and ingredient transparency.

With **100+ active ingredient-related bills** moving through state legislatures, reformulation has become not just a regulatory issue — but a brand survival strategy.

Titanium Dioxide:
Prohibited in CT, NY, TX, AZ

Synthetic Food Dyes
(Red 3, Red 40, Yellow 5 & 6, Blue 1 & 2, Green 3):
Banned in TX, FL, AZ, WV—particularly in school settings

Brominated Vegetable Oil (BVO):
Banned in CA, IL, NY

Potassium Bromate:
Phased out in CA, IL, AZ

Propylparaben, BHA, BHT, Azodicarbonamide:
Targeted across multiple states for links to cancer, endocrine disruption, and other health risks

Federal Follow-Through

These state-level bans are driving national action and the FDA is responding fast. Under pressure from both consumers and lawmakers, the FDA is adopting bans and policy reforms that reflect MAHA's health-first framework:

Red Dye No. 3: The FDA revoked its authorization due to cancer risks in animal studies.

- Phaseout request: Food companies are now being asked to remove it by the end of 2026, earlier than the previously announced 2027–2028 deadline.

Remaining Synthetic Dyes: The FDA plans to eliminate all six remaining synthetic dyes still on the market — Red 40, Yellow 5, Yellow 6, Blue 1, Blue 2, and Green 3 — by the end of 2025.

Newly approved additives: The FDA approved three new food colors from natural sources — Galdieria extract blue, Butterfly pea flower extract, and a white color, Calcium phosphate.

FDA Commissioner Marty Makary stated the agency is initiating the process to revoke authorizations and set a national standard and transition timeline. While there's currently no formal mandate, there's a strong mutual understanding with the food industry to act swiftly.

Brominated Vegetable Oil (BVO): Officially banned in August (2024) for its association with thyroid dysfunction and neurological issues.

- Reformulation deadline: August 2025

Potential GRAS Reform (In Progress): Aims to close the loophole allowing companies to self-certify food additives as safe without FDA oversight.

- Manufacturers may be required to submit safety data and notify the FDA before launching new ingredients.
- Compliance timeline: Undetermined

"Let's start in a friendly way... but we are exploring every tool in the toolbox to make sure this gets done very quickly."

Marty Makary,
FDA Commissioner

Many of these moves, from individual state bans to sweeping federal decisions, stem directly from consumer demand for healthier, more transparent food. The MAHA Commission has become the catalyst for rethinking what belongs on America's plate.

3 Steps to Reformulation

F&B industry practices must continuously adapt to align with evolving market preferences and regulatory demands. Whether that means answering the call for healthier products or providing simpler ingredient labels, reformulation is the path to sustained growth.

1 Lean on AI to identify trends and ingredients

Detect high-risk or banned ingredients early and prioritize consumer preferences using automated data extraction and comparison tools to streamline reformulation across product lines. In the near future, increasingly sophisticated AI platforms will play an increasingly important role in helping organizations identify alternative ingredients, weigh the outcomes of product reformulation strategies, and drive smart sourcing and compliance strategies.

2 Diversify supply chains and connect with vetted suppliers

Use tools that can quickly connect you to vetted suppliers to ensure consistent quality, manage compliance, and mitigate disruptions during the reformulation process.

3 Turn accountability into advantage

Stay ahead of both state and federal compliance with integrated digital tools that turn traceability and transparency into competitive differentiators.

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