



**Date:** October 1, 2023

**Re:** National Bioengineered Food Disclosure (NBFDS)

Thank you for your interest in United Sugar Producers and Refiners (United) sugar products.

The National Bioengineered Food Disclosure Standard (NBFDS) states that highly refined foods or ingredients that do not contain detectable modified genetic material are not bioengineered (BE) foods, thus do not require labeling. Those subject to mandatory bioengineered food disclosure are to keep sufficient records to establish compliance.

The sugar sold by United is produced or refined from sugarcane and sugar beets that have been approved for cultivation and processing by the USDA, FDA, and EPA. Beginning with the 2008 harvest, the beet sugar marketed by United is produced from bioengineered sugar beets (H7-1).

The refining process removes the genetic material from the raw agricultural product which has been validated through testing. Several published studies have demonstrated that genetic material is not detectable in refined beet or cane sugar. U.S. Department of Agriculture (USDA) determined that only foods containing detectable genetic material are to be considered as bioengineered.

Based on the scientific evidence from the published studies, sugar is a highly refined product at 99.9% pure, product testing results with no detectable modified genetic material along with the USDA determinations of highly refined foods and detectable limits, refined beet or cane sugar does not require BE food disclosure or labeling as the finished product does not contain detectable genetic material.

The molasses in brown sugar is an identity preserved ingredient that does not contain BE materials. The corn starch used for powdered sugar as of January 1, 2021 is an identity preserved ingredient and does not contain BE material.

Sugar/Sucrose no BE Labeling  
Brown Sugar no BE Labeling  
Powdered Sugar no BE labeling  
Liquid Sugar no BE Labeling

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United Sugar Producers and Refiners

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