



**Date:** October 1, 2023

**Re:** Product Safety and Security Statement

At United Sugar Producers and Refiners (United), we take immense pride in nurturing a thriving food safety culture that fuels our unwavering pursuit of product excellence. The introduction of the Food Safety Modernization Act (FSMA) served as a catalyst for a thorough evaluation of our food safety systems, reaffirming our steadfast commitment to food safety. This review process not only reinforced several aspects of our food safety protocols but also prompted us to take extra measures to fortify the security of our sugar products. We're delighted to share the following key points, which underscore our continuous dedication to elevating food safety and product quality:

- We have implemented and continue to monitor numerous systems to assure that product produced by United or our Members will not be (i) adulterated or misbranded within the meaning of the Federal Food, Drug and Cosmetics Act of June 25, 1938, as amended (or of any substantially similar applicable state law); (ii) will not be produced or shipped in violation of Section 404 or Section 301(d) of said Act (or of any substantially similar applicable state law); and (iii) will comply with other applicable governmental regulations.
- We have implemented and continue to monitor numerous systems to assure that product produced by United, or our Members, complies with FSMA Final Rule for Preventive Controls for Human Food.
- Our written product specifications define quality standards and serve as the benchmark against which products are regularly tested.
- Sugar supplied by United member companies is processed in the United States from sugar beets and sugar cane either grown in the United States or purchased following Tariff Rate Quota (TRQ). U.S. sugar imports are strictly controlled by TRQs. The volume of these quotas is established annually by USDA, and the U.S. Trade Representative (USTR) allocates the TRQs among countries. Although sugar is a commodity that is traded worldwide, United does not trade sugar on the world market.
- Transport equipment is compliant to CFR 21 Part 1 Subpart O Sanitary Transport of Human and Animal Food. All motor and rail vehicles are food grade with inspections conducted prior to loading. The inspections are completed by individuals who are trained in food safety. To ensure food safety of equipment, motor or rail vehicles coming into sugar service are food grade and require a wash.
- Customers and all rail and truck carriers have been directed to implement measures to secure transport equipment. We require the sealing of access points on transport vehicles to provide food safe conditions. All United loading facilities are to immediately report to management any transport vehicle failing to meet this request.
- We have implemented and continue to monitor numerous systems to assure that product produced by United, or our Members, complies with the FSMA Final Rule for Mitigation Strategies to Protect Food Against Intentional Adulteration.
- United regularly conducts self-audits and contracts third party auditors to assure compliance with all USDA and FDA regulations regarding production and handling of sugar.



- Products produced by United, or our Members, are produced in compliance with all applicable requirements of the Fair Labor Standards Act, as amended, and of regulations and orders of the United States Department of Labor issued thereunder, as well as all other applicable governmental regulations.
- United maintains state of the art information systems, including continuous monitoring for electronic viruses.

The processes outlined above are regularly monitored and reviewed for compliance and to continually strengthen our food safety systems.

Thank you for your concern in this matter. Please call or write if you have any questions or concerns. United Sugar Producers and Refiners is committed to continued service to our valued customers.

Janet A. W. Harriman  
Director of Quality and Safety  
United Sugar Producers and Refiners

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