



**Date:** March 19, 2025

**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. Sugar is a highly refined product that is 99.9% pure, and 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). On December 29, 2023, the U.S. Department of Agriculture (USDA) added sugarcane to the list of bioengineered crops. Even with this addition, the refining process removes the genetic material from the raw agricultural product which has been validated through testing. According to the Code of Federal Regulations, Title 7, 66.9 and 66.302, so long as no significant changes are made to the validated process, and records are maintained to demonstrate that the refining process has been validated and consistently followed, no additional testing is necessary. United maintains these records in accordance with the CFR 7 66.9 and 66.302.

Additionally, the USDA has determined that highly refined foods, including sugar derived from sugar beets or sugar cane, do not require disclosure or labeling for bioengineered (BE) foods, as the final product does not contain any detectable genetic material. The USDA determined that only foods containing detectable genetic material are to be considered as bioengineered. Please see our Country-of-Origin statement for additional information regarding countries for raw cane origin.

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

Please call or write if you have any questions or concerns. United 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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