



Date: August 27, 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. The Sugar refining process is a highly refined food which has been validated through testing. United maintains records in accordance with the CFR 7 66.9 and 66.302.

In addition, we offer non-GMO certified products. These products under those material numbers are maintained as a certified non-GMO material from farm to delivery. Documentation for these materials is provided separately.

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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