UNITED™
SUGAR PRODUCERS & REFINERS

**Date:** September 22, 2026
**Re:** GRAS Status – Sucrose – 21 CFR 184.1854

Sugar products produced by United Sugar Producers and Refiners (USPR) are in compliance with 21 CFR 184.1854, and are food grade products that have been designated the status of Generally Recognized As Safe (GRAS) by the U.S. Food & Drug Administration (FDA). Sugar products produced by United, including all raw, powdered and brown sugar products, meet the requirements of 21 CFR 170.3, 21 CFR 170.30, and the Federal Food, Drug, and Cosmetic Act (the Act).

For more information on the laws regarding GRAS designation generally, please see the references quoted from the Code of Federal Regulations and FDA literature included at the end of this document.

The purpose of this statement is to provide a clear and transparent overview of United Sugar Producers and Refiners' current policies and practices.

"Under sections 201(s) and 409 of the Act, and FDA's implementing regulations in 21 CFR 170.3 and 21 CFR 170.30, the use of a food substance may be GRAS either through scientific procedures or, for a substance used in food before 1958, through experience based on common use in food. …. Under 21 CFR 170.30(c) and 170.3(f), general recognition of safety through experience based on common use in foods requires a substantial history of consumption for food use by a significant number of consumers." https://www.fda.gov/food/food-ingredients-packaging/generally-recognized-safe-gras

"The following general food categories are established to group specific related foods together for the purpose of establishing tolerances or limitations for the use of direct human food ingredients. Individual food products will be included within these categories according to the detailed classifications lists contained in Exhibit 33B of the report of the National Academy of Sciences/National Research Council report, "A Comprehensive Survey of Industry on the Use of Food Chemicals Generally Recognized as Safe" (September 1972), which is incorporated by reference. Copies are available from the National Technical Information Service (NTIS), 5285 Port Royal Rd., Springfield, VA 22161, or at the National Archives and Records Administration (NARA). For information on the availability of this material at NARA, call 202-741-6030, or go to:http://www.archives.gov/federal_register/code_of_federal_regulations/ibr_locations.html

…
(9) Confections and frostings, including candy and flavored frostings, marshmallows, baking chocolate, and brown, lump, rock, maple, powdered, and raw sugars.
…"
(https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=170.3)

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