



Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.iclfood.com
Email: ICL.CustomerInquiry@icl-group.com

January 29, 2024

ALLERGEN STATEMENT:
PHOSPHATES, PHOSPHORIC ACID, AND SULFATES

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. Unless otherwise indicated on the product specification sheets, these products do not contain any of the following allergenic substances, as specified in the U.S. Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA):

- Milk (and Milk Products)
- Eggs
- Fish
- Crustacean Shellfish
- Tree Nuts
- Wheat (or other Cereal Grains)
- Peanuts
- Soybeans (and Soy Products)
- Sesame

In addition, our food grade products do not contain any of the following allergens of concern in certain other world regions or countries:

- Gluten
- Mustard (or mustard seeds)
- Celery
- Sulfites
- Molluscan shellfish
- Lupin

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March 13, 2024

BSE / TSE - FREE STATEMENT
FOR PHOSPHATE SALTS, PHOSPHORIC ACID, AND SULFATES

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials.

There are no animal-derived proteins, tissues, or other biological materials used as raw materials or in the production of these inorganic food and/or feed ingredients. Therefore, we are able to guarantee the absence of BSE (bovine spongiform encephalopathy) or other forms of TSE (transmissible spongiform encephalopathy) in our phosphate salts, phosphoric acid, and sulfate products.

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April 10, 2024

PROPOSITION 65 STATEMENT – PHOSPHATES

California Proposition 65, the “Safe Drinking Water and Toxics Enforcement Act of 1986”, requires the Governor of this state to publish a list of chemicals that are known to that state to cause cancer, birth defects, or other reproductive harm. This list is periodically updated with additions and delisted substances as determined by that state agency.

While none of the phosphates (or their raw materials) produced by ICL Specialty Products Inc. (including ICL Food Specialties and ICL Advance Additives) appear on the current list as of this date, some of the phosphates may contain very low or trace levels of certain compounds (which are naturally occurring in phosphate ore) that do appear on the Proposition 65 list.

Listed below are the upper limits of the Food Chemicals Codex (FCC) specifications for arsenic and lead, which are on the Proposition 65 list. The specifications for these impurities are met by our FCC food grade phosphates according to the levels listed in their specific FCC monographs.

Arsenic	< 3 mg/kg
Lead	< 2 or 4 mg/kg

Any assessments to determine if the “safe harbor” provisions of Proposition 65 are met are the responsibility of the user.

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January 5, 2024

GE / GMO (Genetically Engineered or Modified Organism) Statement

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. These inorganic products do not contain any components from plants, animals, or microorganisms, nor are they derived from or manufactured with materials or ingredients that are genetically engineered (GE) or genetically modified (GM). These ICL phosphate salts, phosphoric acid, and sulfate products also conform to the current EU regulations on genetically modified food and feed (EU 1829/2003 and EU 1830/2003).

In addition to not containing any genetic material these products are not listed on The Agricultural Marketing Service (AMS) list of bioengineered crops or foods nor do they contain such materials; therefore, no bioengineering disclosure is required.

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March 31, 2021

GOOD MANUFACTURING PRACTICE STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high purity food grade phosphates, phosphate blends, phosphoric acid, sulfates, and sea salt products, as well as other specialty blends of food ingredients intended for use in food formulations.

All ICL food grade manufacturing facilities, in addition to compliance with local and regional manufacturing regulations, adhere to the requirements of current Good Manufacturing Practice (cGMP) as defined in Title 21 of the U.S. Code of Federal Regulations (CFR), Part 110 - "Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food". This chapter of CFR Title 21 provides information from the U.S. Food & Drug Administration regarding food for human consumption. According to the definition of "food" in the U.S. Federal Food, Drug, and Cosmetic Act (FDCA) – Sec.201(f), and in regulation 21 CFR 110.3(f), this term includes components, raw materials, and ingredients, used in the manufacturing of food and drink for man or other animals. All ICL food grade manufacturing facilities maintain certifications according to the Global Food Safety Initiative (GSFI) to ensure that a 3rd party is evaluating the operating procedures and practices at each site.

ICL food grade ingredients are certified to meet the specifications listed in the appropriate food grade monographs, such as those published in the most current edition of the Food Chemicals Codex (FCC). The purpose of the FCC is to define the quality of food grade ingredients in terms of identity, strength, and purity, which are based on the elements of safety and good manufacturing practice. A designation of "FCC Grade" indicates adherence to the FCC specifications for that particular food ingredient.

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March 15, 2024

HEAVY METALS TESTING IN FCC GRADE PRODUCTS

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures and/or markets high quality phosphates, phosphoric acid, sulfates, and adipic acid products that meet appropriate food grade specifications and can be used as food ingredients.

The Food Chemicals Codex (FCC) is a compendium of monographs for food ingredients, which includes characteristics, specifications, and test methods to determine the suitability of products for use in foods. FCC specifications are accepted for use in the U.S. and many other countries as an indication of appropriate purity for use in human foods.

The FCC no longer utilizes the Heavy Metals test method. In the Fifth Edition of the FCC (effective on January 1, 2004), the Committee on Food Chemicals Codex instituted a policy to replace the former general Heavy Metals (as Lead) test in many monographs with individual heavy metals limits and tests as determined pertinent based on the source and composition of the individual food additives. This allows for more specific tests and lower specification limits to be placed on only the specific heavy metals which could potentially be present in that food additive. Therefore, the general Heavy Metals test is no longer part of the FCC requirements, and instead, more specific analyses are required to test for certain individual metal impurities, as specified in the current FCC monographs.

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April 10, 2024

STERILIZATION – IRRADIATION STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials.

No sterilization procedures have been performed on these products, including, but not limited to: irradiation, steaming, or chemical processing for the purpose of sterilization.

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February 19, 2024

LOT CODE NUMBERING STATEMENT – ICL NORTH AMERICA

For tracking and identification purposes, ICL Specialty Products Inc. uses the SAP system at its U.S. facilities to generate unique lot numbers for all materials for sale. (A separate lot code numbering system is currently used for our Halox® products and at our production locations in Germany and Austria. Please request separate statements with those explanations, if needed.) These lot numbers appear on the bags, on the Certificate of Analysis, on the pallet labels, and on the bill of lading.

For packages (such as bags, drums, and super sacks) the lot number has 9 digits. The first 3 digits represent the plant of manufacture, while a computer-based counter at each plant sequentially assigns a number to generate the last 6 digits.

For bulk material, the lot numbers have 10 digits. The first 4 digits refer to the plant of manufacture, while the last 6 digits are generated by a computer-based counter at each plant.

Below is a list of the plant codes for ICL-NA sites. Additional 4-digit codes are also assigned to third-party locations in North America that package products for our company.

Please note that these lot code numbers can be represented with or without a “-“after the initial facility code (for example: 221-123456 or 221123456). Both formats (with and without the hyphen) are acceptable and are interchangeable.

Plant of Manufacture	3-Digit Code	4-Digit Bulk Code
Carondelet, Missouri	221	2210
Lawrence, Kansas	223	2230

For products manufactured at facilities in Brazil, the lot code will have the following 9-digit format: AAYYMMDDX

AA = production area code

YY = year of manufacture

MM = month of manufacture

DD = day of manufacture

X = sequential production number

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March 11, 2021

MICROBIOLOGICAL TESTING STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. The raw materials used for the production of these products should, by their nature, neither carry nor support the growth of microbiological contaminants. The chemical reactions and processing conditions involved in converting these raw materials to end products are such that they also preclude the transport or support of microbiological organisms.

Some microbiological species are airborne and could enter the container during packing, transport, storage, or use handling. Some of these factors are out of our control, so we cannot guarantee a totally microbial-free product. The chemical composition of the products and the environmental conditions should not, however, support the propagation of microbiological organisms. Initial challenge tests conducted internally involving selected phosphate products have confirmed that intentionally-added microorganisms will not survive in these stored products.

While the microbiological risk in these inorganic products is viewed as negligible, we have taken additional steps to implement a basic microbiological testing program at each of our manufacturing sites, which include Salmonella and Listeria. Due to inherent differences at our sites based on products manufactured, raw materials required, and processes utilized, these testing programs are not necessarily uniform among these sites. In our various site programs, representative samples of finished food grade products are routinely sent to an independent laboratory for microbiological testing. Sampled lots are placed on hold and not released unless a negative result is confirmed from the testing laboratory. In addition, some of our manufacturing sites also routinely conduct microbiological environmental swabbing tests on involved areas and zones. These microbiological testing programs are one component of ICL's commitment to food safety.

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December 10, 2021

“NATURAL” STATEMENT

This statement is in response to the question of whether ICL products (phosphoric acid, phosphate salts, and sulfate salts) are considered “natural” ingredients. The term “natural” has not been specifically defined in U.S. Food & Drug Administration (FDA) regulations or in the Federal Food, Drug, and Cosmetic Act. The FDA does, however, restrict the use of the term “natural” for labeling in the case of added color, synthetic substances and flavors. Additionally, the agency has indicated that the use of the term “natural” means that nothing artificial or synthetic has been included in, or has been added to, a food that would not normally be expected to be in the food (Ref: 58 FR 2407).

The Food Safety and Inspection Service of the USDA, which has regulatory jurisdiction over meat and poultry products, has defined the use of “natural” in product labeling as: A product containing no artificial ingredient or added color and is only minimally processed (a process which does not fundamentally alter the raw product). In addition, the label must explain the use of the term natural (such as – no added colors or artificial ingredients; minimally processed). At this time, there is not a standard definition specifically for “natural” food ingredients.

Food ingredients from ICL - phosphate and sulfate salts - are produced by neutralization of the corresponding acid (phosphoric or sulfuric acid) with the appropriate alkaline compound (e.g., sodium, potassium, or calcium hydroxide). Phosphoric acid is typically produced by reacting phosphorus-containing ore with an acid, and then separating and purifying through extraction techniques. Sulfuric acid is typically produced from combustion of elemental sulfur or hydrogen sulfide under controlled conditions, with subsequent reactions with water. ICL considers these products to be synthetic substances, since they are not present in nature in their current form of phosphoric acid, phosphates or sulfates.

ICL phosphates, phosphoric acid, and sulfates are purified and/or produced from naturally occurring inorganic minerals. Interpretation and use of the term “natural” for our products must be made by the food or beverage manufacturer using these products in their formulations, based on the understanding that the raw materials for these food ingredients have undergone processing to convert them from their naturally-occurring mineral forms to products that can be used as food ingredients.

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July 30, 2021

**INFORMATION SUMMARY FOR PHOSPHATES ALLOWED
IN ORGANIC FOOD APPLICATIONS (U.S.)**

U.S. National Organic Program (NOP):

The NOP is a regulatory program housed within the USDA Agricultural Marketing Service. This program is responsible for developing national standards for organically-produced agricultural products. These standards assure consumers that products with the USDA organic seal meet consistent, uniform standards.

A link to the general website for this program is provided: [USDA National Organic Program](https://www.ams.usda.gov/nop)

The regulations for the National Organic Program, including the NOP National List, can be found in Title 7 of the Code of Federal Regulations, Part 205. The electronic link is:
[Title 7 CFR Part 205](https://www.ecfr.gov/current/title-7/chapter-I/subchapter-A/part-205)

The National List:

The “National List of Allowed and Prohibited Substances” was established by the NOP to list the ingredients or substances that can or cannot be used in various types of organic production. The National Organic Standards Board (NOSB) meets regularly to evaluate petitions for inclusion of new substances on this list, and can recommend any additions or deletions to this List to the USDA.

Section 205.600 of the National List provides evaluation criteria for allowed and prohibited substances, methods, and ingredients.

Section 205.605 of the List provides information regarding the use of phosphates in organic food production. This section is titled: “Nonagricultural (non-organic) substances allowed as ingredients in or on processed products labeled as ‘organic’ or ‘made with organic (specified ingredients or food groups(s)).”

(a) Non-synthetics allowed: (not applicable to phosphates)

(b) Synthetics allowed: Phosphates currently on the list include:

- Calcium phosphates (monobasic, dibasic, and tribasic) - *No other disclaimers are noted, so these three ingredients can be used in any food application*
- Phosphoric acid – cleaning of food –contact surfaces and equipment only
- Potassium phosphate – for use only in agricultural products labeled “made with organic (specified ingredients or food group(s)),” prohibited in agricultural products labeled “organic”.
This is interpreted by industry to include only ortho-potassium phosphates (MKP, DKP, TKP), based on the definition given in 21 CFR 182 for sodium phosphates (and the similarity of potassium phosphates to this group of phosphates).
- Sodium acid pyrophosphate (CAS # 7758-16-9) – for use only as a leavening agent
- Sodium phosphates – for use only in dairy foods
This entry includes only ortho-sodium phosphates (MSP, DSP, TSP), based on the definition in 21 CFR 182 for sodium phosphates.
- Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines For Foods - *This CFR citation includes calcium, magnesium, phosphorus, & potassium, at specified levels for fortification in appropriately labeled foods. The FDA regulations in this section must be followed specifically.*

Labeling Information:

- The National Organic Program has information about Organic Labeling and Marketing on its website (<https://www.ams.usda.gov/grades-standards/organic-labeling-standards>) and in 7 CFR 205.
- If other non-organic ingredients are present in a food with an “organic” or “made with organic” label, these ingredients must be approved on the National List for use in that food application.

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March 13, 2024

PESTICIDE - FREE STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high purity food grade phosphates, phosphate blends, phosphoric acid, sulfates, and sea salt products, as well as other specialty products and blends of food ingredients intended for use in food formulations.

Strict pest control policies are maintained at our food ingredient manufacturing facilities, which are certified under Global Food Safety Initiative (GFSI) programs. Pest control is contracted to licensed pest management companies. Only specially trained and licensed applicators treat our facilities as needed, using pesticides that have been approved for use in food facilities. Interior facility treatments consist of direct and contained application of pesticides to structural surfaces. In addition, pesticides are not stored on site at the manufacturing or warehousing areas.

Therefore, we can guarantee that the raw materials used to manufacture our food grade products, the packaging materials used for product storage, and our final food grade phosphate salts, phosphoric acid, sulfate salts, sea salt products and other specialty products and blends of food ingredients are free from contamination with pesticides and/or pesticide residue.

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July 30, 2021

RESIDUAL SOLVENTS STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. There are no organic solvents used in the manufacturing, processing, packaging, or cleaning procedures associated with the production of these products, with the one exception of Tricalcium Phosphate manufactured at our St. Louis (Carondelet), Missouri, USA facility.*

This statement includes the Residual Solvents that are listed in the classifications printed in Chapter <467> Residual Solvents, of the current edition of the United States Pharmacopeia (USP) Official Compendia of Standards. ICL does not test for these substances since they are not used at any point in the processes for our products. Because there should not be a source of potential contamination, ICL is exempt from doing this testing on the final product, according to the current USP. Therefore, we will guarantee that our products meet the USP Residual Solvent requirement.

**Note that only the Tricalcium Phosphate (TCP) manufactured at the St. Louis, Missouri, USA facility uses a low level of acetic acid (a USP Class 3 Residual Solvent) in its manufacturing process. According to the USP, substances in this lower risk category should be present at a residual level of less than 0.5% to be acceptable without further justification. The TCP from this facility has been tested and meets the requirement for <0.5% acetic acid. Therefore, we will also guarantee that this TCP meets the USP Residual Solvent requirement.*

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April 10, 2024

SEWAGE SLUDGE (BIOSOLIDS) STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures and/or markets high quality phosphate salts, phosphoric acid, and/or sulfates, which are high purity inorganic products manufactured from refined mineral raw materials.

Sewage sludge (which may also be referred to as Biosolids after proper treatment according to EPA standards) is not utilized either as a source for raw materials, or in any part of the manufacturing processes for our food grade phosphates, phosphoric acid, or sulfates products.

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February 4, 2021

SHELF LIFE AND STORAGE CONDITIONS STATEMENT

ICL Specialty Products Inc. (North America), including the ICL Food Specialties and ICL Advanced Additives divisions, manufacture and/or market high quality phosphates, phosphoric acid, sulfates, adipic acid, sea salt, licorice root extract products, and specialty food ingredient blends for use in food, pharmaceutical, and/or industrial applications.

The recommended storage conditions are for materials to be kept at ambient temperatures, low to moderate humidity and in the original packaging. Materials stacked during long-term storage may develop some pressure compaction and require screening or milling before use. This is particularly true of powdered products. In addition, Licrezz™ products must be stored in sealed packaging that prevents exposure to light, and under cool and dry conditions.

ICL does not guarantee the performance of our products indefinitely since we have no control over how materials are stored. However, if the recommended storage conditions are maintained, performance should be assured for the shelf life listed in the attached table, and in the case of some products, for a much longer period of time.

ICL will not recertify expired products for shelf life extension.

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Shelf Life Table --- ICL Specialty Products Inc. / ICL Food Specialties

<u>12 Month Shelf Life</u>	<u>18 Month Shelf Life</u>
Diammonium Phosphate (DAP)	Benephos® Sodium Potassium Hexametaphosphate (SKMP)
Levn-Lite® Sodium Aluminum Phosphate Blend	Dipotassium Phosphate (DKP)
Levona® Calcium Acid Pyrophosphate (CAPP)	Nutrifos® – Sodium Tripolyphosphate (STPP): 088, 188, BC
Monoammonium Phosphate (MAP)	Nutrifos® Blends: B-90, B-75, L-50, 100, 300, 330, 350, 355, 424
Pan-O-Lite® (Blend of SALP & MCP)	Polyclear®
Py-Ran® Anhydrous Monocalcium Phosphate	Sodium Trimetaphosphate (STMP)
Sodium Acid Pyrophosphate (SAPP): RD-1, 26, 28, 37, 40, 43	Sodium Tripolyphosphate (STPP)
Stabil-9® (Blend of SALP & AMCP)	Tetrapotassium Pyrophosphate (TKPP) – US-produced
	Tripotassium Phosphate (TKP)
	XP-4® (Sodium Phosphate Feed Supplement)
<u>24 Month Shelf Life</u>	
H.T.® Monocalcium Phosphate (MCP)	
Adipic Acid	<u>36 Month Shelf Life</u>
Cal-Sistent® Tricalcium Phosphate (TCP)	
Dicalcium Phosphate (DCPa / DCPd)	Licrezz™: FC, B
Disodium Phosphate (DSPa / DSPd)	Phosphoric Acid: All grades except Semiconductor grade - PurEtch®
JOHA® A100 – Sodium Aluminum Phosphate, Basic	Polyphosphoric Acid: All grades
Leverage® Heat Activated Leavening Agent (DMP)	Potassium Tripolyphosphate (KTPP)
Mianjia™ Blends: 100, 310, 400	Salona™ Sea Salt
Monosodium Phosphate (MSP)	Tetrapotassium Pyrophosphate (TKPP): Germany-produced
PurEtch® Phosphoric Acid – Semiconductor Grade	Tricalcium Phosphate: only EU food grade
Snow Fresh® Produce Stabilizer	Mag-nificent® Dimagnesium Phosphate (DMP)
Sodium Acid Pyrophosphate (SAPP NL)	Monopotassium Phosphate (MKP)
Sodium Acid Pyrophosphate (SAPP): Technical grades	
Sodium Hexametaphosphate (SHMP): All grades	<u>ICL Food Specialties Blends:</u>
Tetrasodium Pyrophosphate (TSPP)	<i>The shelf life information for blends or products that are</i>
Tricalcium Phosphate (TCP)	<i>not specifically listed on this document is stated on</i>
Trisodium Phosphate (TSPa / TSPc)	<i>each of the individual product specification sheets.</i>



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April 10, 2024

VEGAN AND VEGETARIAN STATEMENT

ICL Food Specialties (a division of ICL Specialty Products Inc.) manufactures high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. These products do not contain any organic compounds. There are no animal products or animal derivatives contained in or used in the manufacturing of these food ingredients, so they should be acceptable for use in foods produced for vegan or vegetarian diets.

The information stated herein is presented in good faith and is believed to be correct as of the date specified in this statement.

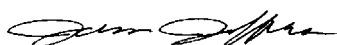
Shipped to:	Seller Order # : Customer Sales Order # Container ID :
Ship Date: Oct-30-20	Certificate Date: Oct-30-20

Our Product: Tetrasodium Pyrophosphate Anhydrous (TSPP), Code 118, Food Grade, 50 LB Bag, Food Ingredient

Customer Product: 410902
 Certified to NSF/ANSI/CAN Standard 60 by NSF International Max use 14 mg/l
 FCC Grade - Complies with the current specifications of the Food Chemical Codex
 OU certified as Kosher and pareve for use including Passover

PROPERTY INSPECTION METHOD	SPECIFICATION	LOT/MFG.DT/BEST BEFORE DT 223092022 Aug-19-20 Aug-19-22
Appearance, Visual	White Pwd	White Pwd
Equivalent Assay, % Guaranteed	95.0 - 100.5 %	95.0 - 100.5 %
Orthophosphate, 1.0% max	Pass	Pass
Loss on Ignition, % Guaranteed	< = 0.5 %	< = 0.5 %
Insolubles, % Guaranteed	< = 0.2 %	< = 0.2 %
pH, 1% Solution	9.90 - 10.60 PH	10.27
Arsenic, ppm, Guaranteed	< = 3 PPM	< = 3 PPM
Fluoride, ppm, Guaranteed	< = 50 PPM	< = 50 PPM
Lead, ppm, Guaranteed	< = 4 PPM	< = 4 PPM
Thru a USS 20 Sieve, %	99.0 % Min	100.0
Thru a USS 100 Sieve, %	90.0 % Min	95.5

Guaranteed analysis checked at intervals according to plant schedule.
 Note: Equivalent Units of Measure: mg/kg = ppm; µg/kg = ppb
FOR CUSTOMER SERVICE PLEASE CALL: (800) 244-6169
 Authorized By: Jason Jeffers - Quality and Food Safety Manager
 LAWRENCE PLANT, 440 N. NINTH ST., LAWRENCE, KS, 66044



Lawrence, KS USA Process Overview Phosphate Salts

