



## Assessment of Environmental Pathogen Risk – Sugars and Syrups

Issue Date: **June 10, 2020**

Reviewed Date: **March 6, 2023**

Document No. **G/01-160/R0P**  
Effective Date: **June 16, 2020**

Following a review of information gathered from in-house risk assessments, in-house testing, FDA guidance documents, food industry documents, and other industry knowledge, we have determined that the refined sugar products manufactured by Florida Crystals Corporation/ASR Group (FCC/ASR) pose no food safety risk for growth of pathogenic microorganisms. There is however, some evidence of survival of some pathogenic microorganisms if they were introduced post the processing control point which confirms the need of an Environmental Monitoring Programs (EMP) within FCC/ASR. This conclusion is validated by a 2020 pathogen challenge study.

The FCC/ASR's EMP is purposefully designed to verify the sanitation effectiveness of those parts of the operation (i.e. processing and / or packaging) which are beyond the point in the operation where microbiological control through processing parameters are in place. Therefore, the EMP in place at each facility aims to ensure conditions do not exist which could allow for post kill-step pathogenic microorganism contamination of our sugar products. Each facility has its own unique EMP, which meets the requirements of our Corporate Environmental Monitoring Policy (G/01-160/B) but is also fit for purpose for their facility.

### Supporting Data:

In 2020, a pathogen challenge study including Salmonella, E. coli, Listeria, and Staphylococcus confirmed that these four pathogens could not grow in granulated sugar, brown sugar, liquid sugar, or refiners' syrup / molasses. This study also confirmed the processing conditions of sugar refining significantly reduce or eliminate (5-log reduction) pathogenic microorganisms.

Several facilities within the FCC/ASR, have manufactured pharmaceutical (NF) sugar for over 50 years. Lots (batches) of sugar destined for pharmaceutical use are tested for a number of pathogenic microorganisms to comply with both the USP/NF compendium requirements and internal specification limits. None of the lots tested have ever produced a positive result for a pathogenic microorganism.

Furthermore, since 2014, the Chalmette Refinery (Arabi, LA) has tested granulated sugar from six FCC/ASR refineries for Enterobacteriaceae, which is a broad test for a series of enteric organisms which may include pathogenic microorganisms. There have been no positive tests for these microorganisms.

The HACCP Programs in use within the company are mature systems, having been implemented over 20 years ago. In that time, no food safety microbiological risks in finished product have been identified.

Risk (hazard) re-analysis was performed in conjunction with the FSMA regulations which became effective September 2016. This analysis included all raw materials, chemicals and process aids. All potential food safety risks identified, are controlled by the refining process, and no further testing, beyond the NF testing was needed to demonstrate control.

A review of the current CDC (Centers for Disease Control) and RASFF (Rapid Alert System for Food and Feed – EU) on-line postings does not include any references to illnesses caused by microbiological issues linked to sugar.

Historically, sugar has consistently demonstrated that it inhibits the growth of pathogenic microorganisms. Many foods are in fact formulated with sugar to kill and prevent the growth of such organisms.

The water activity ( $a_w$ ) of sugar products is lower than the minimum required by pathogenic microorganisms to grow. Granulated sugar has a published water activity of 0.622, while the minimum water activity requirements



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for Staphylococcus is 0.830. Other typical pathogenic microorganisms have water activity needs that are higher. FDA literature demonstrates how sugar can be used to control water activity in products to prevent the growth of pathogenic microorganisms (FDA Bad Bugs publication).

FDA’s Hazard Analysis and Risk-Based Preventive Controls for Human Food: Draft Guidance\*, no recommendations were made for monitoring of pathogenic microorganisms in the Food Sweeteners category, which includes the products produced by the sugar operations of FCC/ASR.

Conclusion:

All available data and regulatory guidance indicate the refined sugar products manufactured by FCC/ASR member facilities do not support pathogenic microorganism growth and do not pose a food safety risk.

\*FDA Guidance information:

### Hazard Analysis and Risk-Based Preventive Controls for Human Food: Draft Guidance for Industry1

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA or we) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact FDA’s Technical Assistance Network by submitting the form available at <http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm459719.htm>.

<https://www.fda.gov/media/99581/download>

Category	#	Subcategory	<i>Bacillus cereus</i>	<i>Clostridium botulinum</i>	<i>C. perfringens</i>	<i>Brucella</i> spp.	<i>Campylobacter</i> spp.	Pathogenic <i>E. coli</i>	<i>Salmonella</i> spp.	<i>L. monocytogenes</i>	<i>Shigella</i> spp.	<i>S. aureus</i>	<i>Giardia lamblia</i>	<i>Trichinella spiralis</i>	Example Products
Food Sweeteners (Nutritive and Non-Nutritive)	1	Sugars (Dry)													Brown Sugar (Sucrose), Beet Sugar(Sucrose), Invert Sugar, Maple Sugar, Malt Sugar (Maltose), Grape Sugar (Fructose), Corn Syrup Solids, Corn Sugar (Dextrose), Cane Sugar (Sucrose), Milk Sugar, Date sugar, Palm Sugar
Food Sweeteners (Nutritive and Non-Nutritive)	2	Syrup/Molasses (Liquid)													Sorghum Syrup, Maple Syrup, High Fructose Corn Syrup, Molasses, Pancake and Waffle Syrup, Simple Syrup, Liquid Sucrose, Agave Syrup, Rice Syrup
Food Sweeteners (Nutritive and Non-Nutritive)	3	Honey (Liquid)		X											Comb Honey, Strained Honey, Whipped Honey
Food Sweeteners (Nutritive and Non-Nutritive)	4	Imitation Syrup/Molasses (Liquid)		X											Imitation Maple Syrup, Imitation Honey

REVISION HISTORY

Issue Date	Version Number	Summary of Change
June, 2020	0	New Document
September, 2022	0	Document Reviewed no content changes
March, 2023	0	Updated to add shareable designator



**Domino Foods, Inc.**

830 Loring Avenue  
Crockett, CA 94525  
t 510.787.4344  
QualityDocs-NA@asr-group.com

**S. Michael Burchell**

Sr. Director Global Corporate Quality

Subject: FDA Compliance for Direct Food Contact Packaging Materials

January, 2023

To: All Domino Foods, Inc. Valued Customers:

In response to customer inquiries regarding the regulatory status of packaging materials in direct food contact, the following statements clarify and define our position on the subject.

Letters of guaranty have been received from all packaging material vendors supplying items that have direct food contact with any products distributed by Domino Foods, Inc. An example of the text contained in these letters follows:

*"This is in reply to your request to furnish a guaranty that our products comply with U.S. Federal Food, Drug and Cosmetic Act. Each shipment of multiwall paper (inclusive of any plastic film used as a barrier) or woven polypropylene bags, and/or paper rollstocks sold to you are, at the date of shipment, not adulterated, or misbranded within the meaning of Food, Drug, and Cosmetic Act and is free of any synthetic fungicides, preservatives, and or fumigants and absent of additives such as cornstarch that are intended to preserve the product/food item inside or come in contact with product.*

- *In compliance with all applicable FDA regulations 21 CFR 176.170 and 176.180 pertaining to materials used in multiwall paper bags including 21 CFR 177.1520 (plastic films);*
- *In compliance with FDA Good Manufacturing Practices 21CFR 117;*
- *Without any raw material whose dioxin concentrations knowingly exceed the FDA voluntary action level of 2 parts per trillion.*

*We do not, nor do our suppliers of raw materials, intentionally introduce lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyl (PBB) or polybrominated diphenyl ether (PBDE) into our products. Paper may contain trace amounts of some metals because trees will take up these materials from forest soils. Their concentrations however, are well below CONEG, European Parliament and Council Directive 94/62/EC Article 11, RoHS, and other U.S. states Toxins in Packaging requirements.*

*We base this guaranty on our ongoing and auditable manufacturing quality systems and similar certifications and guarantees from our suppliers of raw materials. This guaranty is not assignable and is a continuing guaranty subject to revocation of written notice thereof. This guaranty revokes and supersedes all prior guarantees and is deemed to be part of each of our orders, acknowledgements and invoices covering your business and is subject to the limitation expressed in the guaranty of those contained in our standard terms and conditions of sale."*

Based upon this signed documentation, supported by our routine contact and long standing relationships with all Select Suppliers, we are confident that each packaging material in direct contact with our food products is in full and complete compliance with all applicable FDA regulations related to the subject.

We trust this information is sufficient. Should you require additional information, please feel free to contact us at [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com).

Sincerely,

S. Michael Burchell

Senior Director Global Corporate Quality  
for ASR Group



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830 Loring Avenue  
Crockett, CA 94525  
t 510.787.4344  
QualityDocs-NA@asr-group.com

**S. Michael Burchell**

Sr. Director Global Corporate Quality

Subject: Bioterrorism Registration Renewal Letter

December 14, 2020

To: All Domino Foods, Inc. Valued Customers:

In response to customer inquiries regarding renewal of our registration to The Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (aka "Bioterrorism Act"), please be advised that Domino Foods, Inc. has registered and re-registered in 2020 its facilities in compliance with the requirements of the Bioterrorism Act and its regulations. The Bioterrorism Act directed the Food and Drug Administration (FDA) to establish regulations to require food facility registration.

Title I, Section 102 of the Food Safety Modernization Act (FSMA) requires biennial registration renewal with the FDA between October 1st and December 31st of each even-numbered year. The 2020 renewal process has been completed for all facilities subject to regulation under the Act.

For security reasons, we do not disclose our site by site bioterrorism registration numbers, but can assure our customers this information has been properly obtained and recorded.

We trust this information is sufficient. Should you require additional information, please feel free to contact us at [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com).

Sincerely,

S. Michael Burchell  
Senior Director Global Corporate Quality  
for ASR Group



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**S. Michael Burchell**

Sr. Director Global Corporate Quality

Subject: Good Manufacturing Practices

January, 2021

To: All Domino Foods, Inc. Valued Customers:

In response to customer inquiries regarding our Good Manufacturing Practices (GMPs), the following is a brief description of our GMP policies.

A detailed, current Good Manufacturing Practices (GMPs) policy, most recently revised in December, 2019, applies to all employees, contractors, and visitors at each facility. The procedure addresses personnel practices, such as hair nets, jewelry, eating and hand washing, using the Federal Guidelines for Food, 21 CFR Part 117. These guidelines were adopted by the Food Safety Modernization Act (FSMA), effective September, 2016. Other important categories addressed in the procedure include glass and brittle plastics control, construction and maintenance of the plant and grounds, cleaning substances and cleaning practices, water/sewer system design, equipment and utensil design and control, and process controls from raw material receipt through final product shipment.

All employees receive annual refresher training on Good Manufacturing Practices along with other personal safety and food safety topics. Each facility was audited against the SQF Level 3 international standard at least once per year from 2010 through 2017 to ensure all of the internal quality assurance efforts were remaining current and effective. Beginning in 2018 the revised SQF Food Safety Code for Manufacturing, Edition 8 was used as the auditing standard and sites will begin being audited against SQF Edition 9 as of May 24, 2021. Sites with BRC certification follow the current version of the BRC standard for food safety.

As a company involved in providing food to industrial users, the food service industry and direct consumers, Domino Foods, Inc. is committed to consistently providing quality products to the marketplace and has developed detailed programs to effectively fulfill this commitment.

We trust this information is sufficient. Should you require additional information, please feel free to contact us at [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com).

Sincerely,

S. Michael Burchell  
Senior Director Global Corporate Quality  
for ASR Group



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**S. Michael Burchell**

Sr. Director Global Corporate Quality

Subject: HACCP (Food Safety and Quality) Statement

January, 2021

To: All Domino Foods, Inc. Valued Customers:

In response to customer inquiries requesting HACCP documentation and flow diagrams applicable to products manufactured at our refineries and plants, the following statements summarize our position on the topic.

Each of our operating sites has been successfully certified to a GFSI Food safety standard (SQF or BRC) for multiple years. These Global Food Safety Initiative recognized standards are food safety based codes, which utilizes those principles formerly referred to as HACCP.

A Food Safety Manual, Food Quality Manual, Food Policy Manual, along with numerous other programs and procedures are documented, controlled, reviewed, verified and validated at each operating facility. This overall body of documentation, which constitutes each site's quality management program, is controlled and the majority of the documentation is proprietary. The contents of these Food Safety and Food Quality Manuals, including the "HACCP" style flow diagrams may not be reproduced or forwarded to customers.

Upon request, a Certificate of Registration will be provided for a specific facility, which verifies that the site is registered as meeting the requirements of the current SQF or BRC Food Safety code. The expiry date is prominently displayed near the bottom of the certificate. If necessary, the HACCP plan documentation, including applicable process flow diagrams, can be reviewed at an individual site with appropriate QA/Food Safety personnel.

We trust this information is sufficient. Should you require additional information, please feel free to contact us at [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com).

Sincerely,

S. Michael Burchell  
Senior Director Global Corporate Quality  
for ASR Group



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QualityDocs-NA@asr-group.com

**S. Michael Burchell**

Sr. Director Global Corporate Quality

Subject: Ingredient Statements

January, 2020

To: All Domino Foods, Inc. Valued Customers:

This statement has been prepared in response to customer inquiries regarding ingredient statements for the products distributed by Domino Foods, Inc. This guidance and information will allow customers to access ingredient statement information rapidly and directly.

As the majority of products distributed have either one of two ingredients, individual statements detailing these ingredients have not been prepared. The list of ingredients and the nominal percentage of each ingredient are shown in the Safety Data Sheet (SDS) for the product. In the 16-section SDS, the ingredient details are provided in **Section 3**, "Composition / Information on Ingredients".

We trust this information is sufficient. Should you require additional information, please feel free to contact us at [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com).

Sincerely,

S. Michael Burchell

Senior Director Global Corporate Quality  
for ASR Group

## All White Granulated Sugars

### TYPICAL EXAMPLE OF NUTRIENTS PER 100 g AS IS BASIS

Calories (kcal)	400.0
Total Fat (g)	0
Saturated Fat (g)	0
Trans Fat (g)	0
Cholesterol (mg)	0
Sodium (mg)	0
Carbohydrates (g)	99.9
Dietary Fiber (g)	0
Total Sugars (g)	99.9
Added Sugars (g)	99.9
Protein (g)	0
Minerals & Vitamins:	
Calcium (mg)	0
Iron (mg)	0
Potassium (mg)	0
Vitamin D (IU)	0

“The information contained in this data sheet is true and accurate to the best of our knowledge. However, since the conditions of use are beyond our control, nothing contained herein should be construed as representation, guarantee or warranty, expressed or implied.”

November 2016



## CONFECTIONERS 6X

Revision Date: JANUARY 2014      Specification Number: CO-01  
Revision Number: 6      Group Counter: 1

### PHYSICAL ANALYSIS

Sugar %	95.0 - 98.0	
Cornstarch %	2.0 - 5.0	
Moisture %	0.5	(Max)

### GRANULATION ANALYSIS

USS screen 200	91.5% THRU	(Min)
USS screen 325		

### MICROBIOLOGICAL ANALYSIS

Yeasts	(cfu/g)	10 Wort Agar	(Max)
Molds	(cfu/g)	10 Wort Agar	(Max)
Mesophiles	(cfu/g)	50	(Max)

#### Special Microbe:

E. COLI	ABSENT
SALMONELLA	ABSENT
COLIFORMS	5/gram (Max)
STAPHYLOCOCCUS AUREUS	ABSENT
PSEUDOMONAS AERUGINOSA	ABSENT

### NOTES

- [1] Confectioners sugar is a pulverized mixture of only sugar and cornstarch  
[2] Color and Sediment of the sugar fraction are the same as EFG as per GR-07

Authorized By:

  
S. Michael Burchell  
Director, Quality Management

## Standard Customer Questionnaire Response

**Allergens:** There are no allergens present in the Domino®, Florida Crystals® or C&H® brand sugar or other products processed or packaged at our facilities, with the exception of the item noted below. Allergen training is provided to all new employees and reviewed on an annual basis. Our corporate statement is attached.

A Non-Dairy Creamer, packaged at both a contracted facility and one of our plants, utilizes an ingredient (sodium caseinate, a milk derivative) which may be considered an allergen by some. This product may be warehoused at our refineries and plants to facilitate distribution to customers. All potential cross-contamination is effectively controlled.

**Audits:** All Domino, FCC and C&H, facilities are audited annually by Eagle Foods Registrations, Inc. and possess a Certificate of Registration indicating they have successfully met the requirements of the current edition of the SQF Food Safety & Quality Codes. The date of expiry is shown on each certificate. A copy of the certificate may be obtained by submitting a written request for this documentation to the appropriate Quality Manager listed on the attached facility information sheet. The detailed audit summary may be reviewed during an on-site visit. The US Sugar Company facility in Buffalo, NY is certified to the BRC Food Standard.

**Bioterrorism Act:**

See FDA / Bioterrorism Act.

**Certificates of Analysis (COAs):**

Certificates of Analysis (COAs) are available for all industrial products, typically product in 50 pound bags and larger. The COA is a standard format and is generated automatically at the time of shipment from secured and validated business software. Examples of specific COAs may be available by submitting an email request to [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com). Please be sure to specify the product name(s) in your request.

**Complaint Investigation:**

All industrial customer complaints related to products, shipments and services are entered into a corporate database. Samples are requested when deemed beneficial to the investigation of the reported issue. Each complaint is fully investigated to evaluate the issue(s), determine a cause and develop corrective action. The targeted timing for completion of the process is within two weeks of the initial notification. Site investigations and conclusions are reported to the customer by their sales manager. Complaints are tracked, discussed and reviewed at facility food safety and food quality meetings. Complaint investigation details are utilized as a resource to develop continuous improvement opportunities.

**Continuing Guaranty:**

The request for a letter of continuing guaranty must be submitted to our legal department using the form included in this packet. Guaranty letters can be provided to the direct customer only.

# Standard Customer Questionnaire Response

## Country of Origin:

ASR processes raw cane sugar from domestic sources, such as Florida, Louisiana, Texas, and off shore raw sugar suppliers. Raw sugar is grown throughout the world in tropical and sub-tropical climates. Raw sugar import tariff-rate quota allocations have been established for 40 countries by the US Sugar Quota Program. ASR can purchase raw sugar from any of the countries listed in the attached corporate statement.

## FDA / Bioterrorism Act:

All Domino, FCC and C&H facilities are registered with the FDA and in full compliance with the requirements of the Bioterrorism Act of 2002, including renewal of registration in 2014, 2016 and 2018. Registration numbers are not released for security reasons. Our corporate statement is attached.

## Food Chemicals Codex:

Our products typically meet all of the monograph specifications for sucrose and other listed parameters in the current edition of the Food Chemicals Codex and the USP/NF compendium. A detailed corporate statement outlining any products which do not conform is available.

## Food Safety / Food Quality:

See HACCP.

## Food Safety Modernization Act (FSMA):

The Food Safety Modernization Act of 2011 (FSMA) became effective in September, 2016. The legislation has been fully reviewed and effective programs have been implemented at all locations. We are in full compliance with the Act and will monitor future activities and requirements associated with the scope of the Act. Our corporate statement is attached.

## Genetically Modified Organisms (GMO):

Statements regarding the GMO status of our products are available upon request. These statements describe Non-GMO and GMO products in detail. Unique statements exist for specific products or product groups where applicable. A single corporate Non-GMO statement covering the core cane sugar products is included in this response package. Many products are verified by the Non-GMO Project.

## Glass, Ceramics and Brittle Plastics:

The presence or use of glass, ceramics and brittle plastics is prohibited, except in specific pre-approved areas and applications. Each facility has a register of glass, ceramics and brittle plastics that may impact finished product. The affected areas are audited on a prescribed frequency to confirm the integrity of the items of concern. Records of this verification activity are maintained. Whenever broken glass, ceramics or brittle plastics are observed in any area of the plant, employees must report the discovery immediately. The affected area is promptly secured to prevent the glass from being spread and all potentially impacted material is isolated and quarantined. Once clean-up is complete and verified, the disposition of all quarantined material is evaluated, agreed upon and documented by the site management team.

## Standard Customer Questionnaire Response

**Gluten:** The majority of the products distributed by DFI do not contain gluten from wheat, barley, rye, oats, or any other crossbred hybrids which may cause severe allergic reactions in some persons. A family of malted barley syrup does contain gluten. A corporate statement describing the majority of products is attached. (A statement addressing malted barley syrup is available upon request).

**Good Manufacturing Practices (GMPs):**

Domino, FCC and C&H facilities have documented strict GMP policies which are actively enforced by all supervisory and management personnel. All new employees receive GMP specific training and on an annual basis additional refresher training is given to all employees. All GMP training is documented. Our corporate statement is attached.

**HACCP:** A Hazard Analysis and Critical Control Point (HACCP) plan for all Domino, FCC and C&H facilities referenced in this document is in place and in use. This documentation is an integral portion of the overall Food Safety Plan mandated within the SQF Code. As per corporate policy, we do not publish or share copies of the HACCP plan nor the process flow diagrams contained within these Food Safety Manuals. The complete plan may be reviewed on-site as a part of a requested and approved facility visit.

Certification to the current edition of the SQF standard requires development of a Food Safety Plan. A Food Quality Plan has also been voluntarily prepared; both plans are reviewed in detail during recertification audits. This Food Quality segment of the SQF documentation parallels the Food Safety portion as the Food Quality Manual is also developed utilizing HACCP principles. As with the Food Safety documentation, the contents are not shared or published, however, on-site review may be requested.

Metal detectors are the critical control point for all packaged dry sugar products, while filters are the critical control point for all liquid products. Control points include rare earth magnets and scalping screens. The Food Safety (HACCP) program is built upon a foundation of risk analysis and prerequisite programs all focused on food safety and preventing contamination. All new employees receive HACCP specific training and on an annual basis additional refresher training is given to all employees. All HACCP training is documented.

**Halal:** No products distributed by DFI contain ethyl alcohol, natural L-Cysteine extracted from human hair or feathers, animal fats and/or extracts, bloods of any origin, blood plasma, pork and/or other meat by-products. Our corporate statement is attached.

## Standard Customer Questionnaire Response

### Ingredient Sifting:

Screening of dry, free flowing products is an integral part of the process to achieve conformance to well documented product specifications. All product screening meets the intent of section 1.13 of the current edition of the AIB Consolidated Standards for Inspection.

Powdered sugar and brown (soft) sugar products have unique flow characteristics. Screening or sifting of these products is not possible in conventional screening devices due to elevated moisture, very fine particle size, or the characteristic sticky nature of brown sugar. These product groups must be evaluated utilizing the guidance contained in other sections of the Standards. Our corporate statement is attached.

**Ingredients:** All sugar products distributed by DFI are produced using pure cane sugar. There is no beet sugar present in any of our products. Some commodity products and specialty products do have additives for improved functionality. A partial list of products and constituents follows:

All granulated and liquid sugars (sugar)

All powdered (confectioners) sugars, (sugar, cornstarch or maltodextrin)

Co-crystallized product (honey, molasses or maltodextrin)

None of the ingredients have been grown with sewage sludge and the products do not contain any synthetic compounds.

**Insurance:** All requests for certificates of insurance must be submitted to Chris Winterling by emailing [chris.winterling@floridacrystals.com](mailto:chris.winterling@floridacrystals.com) or at 561-366-5120.

### Irradiation Treatment:

None of the products distributed by DFI are irradiated.

**Kosher:** All products distributed by DFI are certified Kosher by the Circle K rabbinical organization. The “Kosher for Passover” status varies by product. Kosher certificates may be obtained by contacting [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com) or by typing the K-ID in the Search Box at [www.digitalkosher.com](http://www.digitalkosher.com).

### Laboratory Testing:

All testing of in-process and finished products is completed by the Quality Assurance laboratory located within the facility or utilizing an approved 3<sup>rd</sup> party laboratory. Testing is conducted using ICUMSA and other documented and validated methods.

**Lot Coding:** All Domino, FCC and C&H products are marked with a standardized lot coding based on a corporate coding system. The official lot code is five digits, however, additional digits and letters may also appear to aid in production tracking within the refinery or plant. Several products have a unique coding which differs from the standard 5 digit format. The full description of this system is detailed in the attached lot coding statement.

## Standard Customer Questionnaire Response

**Melamine:** None of the products produced by Domino, FCC or C&H contain melamine.

**Microbiology:** Testing for microbiological activity of finished products is completed on-site or utilizing the services of accredited contract laboratories. This testing includes but is not limited to yeast, mold, mesophiles, thermophiles, etc. Limited, random pathogen testing is also completed to validate the effectiveness of operational practices and procedures.

**Nutritional Statements:**

Nutritional statements are compliant with the revised FDA labeling requirements which were originally scheduled to become effective in July, 2018. Nutritional statements for any of our products may be obtained via email request to [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com). Please be sure to specify the product name(s) in your request.

**Pest Control:** A formal pest control program is in place at each Domino, FCC and C&H facility. The pest control program is accomplished using a combination of an outside contractor in addition to certified pest control applicators employed within the facility. All pesticides are approved for use within a food facility. All applications are documented and all labels, SDS, and FDA registration numbers are on file.

**Pesticides and Antibiotics:**

None of the products distributed by DFI contain pesticides or antibiotics. Off-shore (foreign) raw cane sugar is tested for organo-phosphate, organo-nitrogen, organo-chloride, and methyl carbamate residual once per year. All analysis to date has indicated none of these compounds have been present in our incoming raw sugar supply. Since the Code of Federal Regulations (CFR) establishes pesticide levels for domestic food ingredients/supplies, we do not conduct pesticide analysis for domestic sourced raw sugar. Our corporate statement is attached.

**Phenylalanine:** All products distributed by DFI, with the exception of Blue Aspartame, are phenylalanine free.

**Recall:** Domino, FCC and C&H facilities have an established recall and traceability program. All materials and ingredients can be traced from receipt at the refinery to shipment to the customer. Mock recalls are conducted at least annually and the effectiveness of these mock recalls is monitored by the corporate quality department. Our corporate statement is attached.

**Reprocessing:** All products not meeting the specifications of Domino, FCC or C&H are segregated and labeled for reprocessing. All reprocessing is completed using the same processes as used for raw sugar. There is limited rework existing at two of the non-refining plants; when this activity is required the rework is always conducted within the same day to maintain lot integrity. All other nonconforming products are reprocessed through some portion of the refining process, other processes at non-refining locations or returned to refineries for reprocessing.

## Standard Customer Questionnaire Response

### Residual Solvents:

Class 1, Class 2, Class 3 and Table 4 solvents are neither utilized nor generated in the refining process, with the single exception noted. Isopropyl alcohol is the only Class 3 solvent utilized. This material is used as a seed carrier and is totally evaporated during crystallization. Testing is not routinely performed given the historical absence of all volatiles.

### Quality System Certification:

See HACCP.

### Sales Terms and Conditions:

All products are quoted and sold pursuant to Domino Foods, Inc.'s standard terms and conditions which may be viewed at <http://www.dominosugar.com/sales-terms-and-conditions>.

### Sanitation:

Master Cleaning Schedules (MCSs) are established and maintained for all departments within each facility. Sanitation efficiency is monitored via a combination of internal and cross-departmental auditing.

### SDS:

An SDS for any of our products may be obtained by submitting a request to [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com) or through your Customer Service Representative. Please be sure to include the product name(s) in your request.

### Shelf Life Guidelines:

The standard shelf life guidelines listing for all products distributed by DFI is attached.

### Specifications:

Product specification sheets for the specific Domino, FCC or C&H products purchased by your company may be obtained by submitting a request to [QualityDocs-NA@asr-group.com](mailto:QualityDocs-NA@asr-group.com) or through your Customer Service Representative.

### Traceability:

See Recall.

### Trans Fat:

All products distributed by DFI are free of trans fatty acids. Our corporate statement is attached.