



## National Bioengineered Food Disclosure Standard: Acidulant Products

On December 21, 2018, the Agricultural Marketing Service, USDA released the final rule establishing the new mandatory National Bioengineered Food Disclosure Standard (NBFDS). The NBFDS requires food manufacturers, importers, and other entities that label foods for retail sale to disclose information about bioengineered (BE) food and BE food ingredients. This rule is intended to provide a mandatory uniform national standard for disclosure of information to consumers about the BE status of foods. This rule is effective from February 19, 2019 and has an implementation date of January 1, 2020. The mandatory compliance date for BE labeling is January 1, 2022.

ADM *Acidulant* products (*Citric acid, Sodium Citrate, and Potassium Citrate*) may be derived from bioengineered crops. These highly refined *Acidulant* products, produced at ADM Southport, NC, have been purified through multi-step process that will remove protein and DNA, and other impurities. Testing for the presence of recombinant DNA using PCR analysis on ADM *Acidulant* products has repeatedly shown non-detectable limits (0.01% limit of detection) for the CaMV 35s promoter and NOS terminators.

ADM has conducted the validation of the corn processing system, by testing incoming seeds and the finished product going through the documented refining process.

As expected, the PCR results were positive for seed while the refined finished product, *Acidulant* products tested all negative. Based on ADM's interpretation of the USDA AMS NBFDS, the validation testing data, historical testing data as well as our knowledge and experience with the process, ADM Acidulants, including Citric acid (and Citrosol), Sodium Citrate, and Potassium Citrate will not require disclosure under the National Bioengineered Disclosure Standard.

For further inquiries, please do not hesitate to contact us.

ADM Quality Center of Excellence