

Re: FDA Food Safety Modernization Act – HARPC compliance

To our valued customer,

This letter confirms that Tate & Lyle is in compliance with 21 CFR 117 as outlined in section 103 of the FDA Food Safety Modernization Act (FSMA). Tate & Lyle manufacturing facilities maintain certification to a Global Food Safety Initiative (GFSI) recognized scheme. To achieve this certification, a third party certification body evaluates conformance to stringent pre-requisite programs, ongoing adherence to the monitoring and preventive controls required by the principles of HACCP as well as keeping people and processes current through a food safety management system. As such, each facility maintains a current food safety plan, as per 21 C.F.R. § 117.126, by a preventive control qualified individual with adequate training or food safety experience as per 21 C.F.R. § 117.180 (c)(1). Our Food Safety Plan meets the following HARPC requirements:

- To meet the elements of Hazard Analysis (21 C.F.R. § 117.130), Preventive Controls (21 C.F.R. § 117.135), Monitoring (21 C.F.R. § 117.145), Corrective Actions (21 C.F.R. § 117.150) Verification/Validation (21 C.F.R. § 117.155, 117.160) each facility has:
 - HACCP plans using the 7 principles of HACCP as adopted by the National Advisory Committee on Microbiological Criteria for Food (NACMCF).
 - Written cleaning, sanitation and allergen management procedures.
- To meet the elements of Recall Plan (21 C.F.R. § 117.139) each facility is supported by a written corporate recall plan which includes an annual evaluation of effectiveness.
- To meet the elements of Supply-Chain Program (21 C.F.R. § 117.405) we have implemented a supplier quality management program which includes intelligence gathering, evaluation of certifications, record, history and a risk assessment on each supplier/material combination. In addition, suppliers are monitored through supplier audits and random ingredient monitoring.
- All sites review their food safety plans at a frequency that meets the three year requirement of Reanalysis (21 C.F.R. § 117.170).

Yours sincerely,



Catherine Templeton
VP of Global Quality
Tate & Lyle
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