

# Morton Salt, Inc.

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# Windsor Salt Ltd.

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# General Product Information 2024

Food Grade Industrial Products



With the growing number of individual questionnaires, Morton Salt, Inc. has prepared this information packet to meet our customers' documentation requirements for food grade salt. We kindly ask for you to use the information in this packet in place of completing individual forms or requesting individual documents. Manufacturing information that is plant-specific can be obtained from separate plant quality packets. Thank you for considering Morton Salt, Inc.

Hayley Lester Technical & Regulatory Affairs Specialist Morton Salt, Inc. <u>TECHNICALDOCUMENTS@mortonsalt.com</u>

The data provided herein is based on information we believe to be reliable. It is offered in good faith, but without nguarantee, as conditions and methods of use of our products are beyond our control.

#### **AIB Sifting Requirements**

Pursuant to Section 1.13.1.9 of the 2009 AIB Consolidated Standards for Inspection, products manufactured by Morton Salt and Windsor Salt are dry granular ingredients and have been sifted during processing and/or packaging.

Documentation on mesh sizes, frequency of equipment inspection, tailing records and foreign objects found are audited annually to GFSI Standards. This documentation is on file at the production plant and may be reviewed at the plant with reasonable prior notice.

#### Allergens

The products listed in this document do not contain and are not derived from the following materials: milk, eggs, fish, crustacea, mollusks, tree nuts (Almond, Beech Nut, Brazil Nut, Butternut, Cashew, Chestnut, Chinquapin, Coconut, Filbert/Hazelnut, Gingko Nut, Hickory Nut, Lychee Nut, Macadamia Nut, Bush Nut, Pecan, Pine Nut, Pinon Nut, Pili Nut, Pistachio, Sheanut, Walnut, and Heartnut), wheat, soybeans, peanuts, mustard seeds, sesame seeds, celery and/or added sulfites (>10 ppm). They also do not contain gluten (in the form of wheat, barley, rye, oats and triticale), monosodium glutamate and/or hydrolyzed proteins. Measures are in place to ensure there is no contamination by these substances in processing equipment, storage, or handling procedures. The analysis on above mentioned substances is not part of our quality monitoring.

Morton Food Processing Products	Windsor Food Processing Products	
Coarse Food Grade Salt	Windsor Coarse Crushed Salt	
Culinox <sup>®</sup> 999 Fine Salt	Windsor Dried Coarse Salt	
Culinox <sup>®</sup> 999 Food Grade Salt	Windsor Dried Coarse Untreated Salt	
Dendritic with 0.5% TCP	Windsor Fine Crushed Salt	
Dried Coarse Salt	Windsor Hi Grade Granulated Salt	
Extra Fine 200 Salt	Windsor Hi Grade lodized Salt	
Extra Fine 325 Salt	Windsor Hi-Grade Untreated Salt	
Flour Salt	Windsor Hi-Grade Salt, Bulk	
Flour Salt TCP	Windsor Hi-Grade Untreated Granulated Salt	
Food Grade Fine Salt	Windsor Regal <sup>®</sup> Fine Flake Salt	
H.G. Blending Prepared Salt	Windsor Regal <sup>®</sup> Flour Salt	
H.G. Blending Salt	Windsor Top Flake Coarse	
Iodized Salt		
Iodized Star Flake Dendritic ES Salt		
Iodized Table Salt		
KaliSel Potassium Chloride FCC		

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Lite Salt <sup>™</sup> Mixture	
Lite Salt <sup>™</sup> 50/50 KS	
Lite Salt <sup>™</sup> 59% KCl KS	
PureSun <sup>®</sup> Culinary Crystals	
PureSun <sup>®</sup> Culinary Crystals Coarse	
PureSun <sup>®</sup> TFC Culinary Crystals	
Purex <sup>®</sup> All Purpose Salt	
Purex <sup>®</sup> Fine Prepared Salt	
Rock Koshering Salt	
Rock Pretzel Salt	
Rock Pretzel Salt KS	
Sea Salt TCP Extra Fine 70	
Sea Salt Select	
Sea Salt TFC Select	
Snack Flour Salt	
Special Coarse Sea Salt	
Star Flake Dendritic ES Salt	
Star Flake Dendritic Salt	1
TCP Food Grade Fine Blending	1/11
TFC 999 Salt	iil.
TFC 999 Fine Salt	111
TFC Food Grade Fine Salt	X/
TFC H.G. Blending Salt	N
TFC Purex <sup>®</sup> Salt	N VY
Top Flake Coarse Salt	$\sqrt{2}$
Top Flake Extra Coarse Salt 🔨 🧷	TA A
Top Flake Fine Salt	an
Top Flake Topping Salt	4
Vacuum Refined Granulated Salt	6
White Pretzel Coarse Salt	7
White Pretzel Medium Salt	11 5
	11 3

# Animal Origin – TSE/BSE, Materials of Animal or Plant Origin, Animal Testing

During manufacturing and storage, no material of animal or plant origin is used, so that contamination with these products/substances can be omitted.

Food grade products manufactured by Morton Salt, Inc. are not derived from or contain any material of a mammalian animal origin as defined by 21 CFR 589.2000 and 589.2001. Therefore, these products are also free of Bovine Spongiform Encephalopathy (BSE) and Transmissible Spongiform Encephalopathy (TSE). Additionally, the products have not been tested for cosmetic, personal care or other applications on or using animals by Morton Salt, Inc.; nor are there any plans to do so in the future.

# Bioengineered/GMO

Morton Salt, Inc. and Windsor Salt Ltd., do not produce any food grade products that require a bioengineered disclosure nor are derived from bioengineered substances per the National Bioengineered Food Disclosure Standard 7 CFR Part 66 and the Voluntary Labeling and Advertising of Foods that Are and Are Not Products of Genetic Engineering (CAN/CGSb-32.315-2004, Reaffirmed 2021). 7CFR 66.1 Definitions

#### Bioengineered food means-

- (1) Subject to the factors, conditions, and limitations in paragraph (2) of this definition:(i) A food that contains genetic material that has been modified through in vitro recombinant deoxyribonucleic acid (rDNA) techniques and for which the modification could not otherwise be obtained through conventional breeding or found in nature; provided that (ii) Such a food does not contain modified genetic material if the genetic material is not detectable pursuant to § 66.9.
- (2) A food that meets one of the following factors and conditions is not a bioengineered food.
- (i) An incidental additive present in food at an insignificant level and that does not have any technical or functional effect in the food, as described in 21 CFR 101.100(a)(3).

**Bioengineered substance** means substance that contains genetic material that has been modified through in vitro recombinant deoxyribonucleic acid (rDNA) techniques and for which the modification could not otherwise be obtained through conventional breeding or found in nature.

#### **Bioterrorism Act of 2002**

Morton Salt, Inc. and Windsor Salt Ltd. comply with the FDA Bioterrorism Act of 2002. The following Morton Salt Inc., and Windsor Salt Ltd., human and animal food producing, and warehousing facilities are registered with the FDA as a food facility as required per 21 CFR Subpart H – Registration of Food Facility including the 2022 biennial registration renewal requirements.

Facility Name	Facility Address
Morton Salt, Inc Cincinnati	5430 River Rd, Cincinnati, OH, 45233, UNITED STATES.
Morton Salt, Inc Fairless Hills	12 Solar Drive, Fairless Hills, PA, 19030, UNITED STATES.
Morton Salt, Inc Grand Saline	801 State Highway 110, Grand Saline, TX, 75140, UNITED STATES.
Morton Salt, Inc Grantsville	Interstate 80, Exit 84, Grantsville, UT, 84029, UNITED STATES.
Morton Salt, Inc Hutchinson	1000 Morton Dr, S Hutchinson, KS, 67505, UNITED STATES.
Morton Salt, Inc Manistee	180 6th St, Manistee, MI, 49660, UNITED STATES.
Morton Salt, Inc Port Canaveral	450 Cargo Rd, Cape Canaveral, FL, 32920, UNITED STATES.
Morton Salt, Inc Rittman	151 Industrial Ave, Rittman, OH, 44270, UNITED STATES.
Morton Salt, Inc Roseville	2500 Walnut St Ste 100, Roseville, MN, 55113, UNITED STATES.
Morton Salt, Inc Silver Springs	45 Ribaud Ave, Silver Springs, NY, 14550, UNITED STATES.
Morton Salt, Inc Weeks Island	11217 Morton Road, New Iberia, LA, 70560, UNITED STATES.
Windsor Salt Ltd Anjou	10701 Parkway Blvd, Anjou, Quebec, H1J 1S1, CANADA.
Windsor Salt Ltd. – Ojibway	200 Morton Drive, Windsor, Ontario, N9J 3W9, CANADA.
Windsor Salt Ltd Windsor	30 Prospect Ave, Windsor, Ontario, N9C 3G3, CANADA.

FDA Food Facility registration numbers are not provided externally due to security reasons.

#### **Business Continuity Plan**

In the event of a business disruption, internal and external networks have been established to direct the business and carry out critical responsibilities to assure there is no disruption in meeting customer needs. These networks will be manned with selected individuals that are trained on all aspects of emergency preparedness and are subject matter experts. The Corporate Crisis Team will provide expert guidance and be on call 24/7.

In addition, Morton Salt, Inc. and Windsor Salt Ltd. will partner with external agencies to monitor, and if necessary, establish procedures necessary to manage through a crisis. For example, Department of Transportation, World Health Organization, U. S. Centers for Disease Control and Prevention, Canadian Center for Disease Prevention and Control.

#### California List of Chemicals, Proposition 65

This statement is to provide you, a customer of Morton Salt, Inc. ("Morton Salt"), information regarding Morton Salt's compliance with California's Safe Drinking Water & Toxic Enforcement Act of 1986 (also known as "Prop 65"). As you may know, Prop 65 is a California law that applies to any product sold in California<sup>1</sup> and requires businesses to provide warnings to Californians about exposures to chemicals known to the State of California to cause cancer or birth defects or other reproductive harm. The Prop 65 list of chemicals, which is regularly updated, is available at <a href="https://oehha.ca.gov/proposition-65/proposition-65-list">https://oehha.ca.gov/proposition-65/proposition-65-list</a>. Prop 65 is a "right-to-know" type of law, which means that while it requires that parties provide certain warnings about possible exposures to chemicals in products, Prop 65 does not require the elimination of chemicals from products. Morton Salt has coordinated both with its suppliers and internally to evaluate which, if any, of Morton Salt's products trigger the warning requirements under Prop 65.

Morton has determined that our current product offerings are either: (i) products that do not contain chemicals which are listed on the Prop 65 list, or (ii) products for which no warning is otherwise required under the Prop 65 laws.

Morton Salt is committed to complying with Prop 65 warning requirements and will continue to evaluate whether its products require Prop 65 warnings. Morton Salt will update you about any changes to the products we sell to you or to the law that would require Morton Salt to provide warnings under Prop 65.

<sup>1</sup> Includes sale of products to California residents over the internet or via catalog.

# California Transparency in Supply Chain Act of 2010 (the "Act")

Morton Salt, Inc. ("Morton") certifies that, to the best of its knowledge, the materials incorporated into the products supplied by Morton Salt, Inc. to our direct customers, comply with the local, state, and federal laws of the United States regarding slavery and human trafficking.

#### C.M.R. and Nanotechnology

Products manufactured by Morton Salt, Inc. and Windsor Salt Ltd. do not contain substances that are considered Carcinogens, Mutagens, or Toxic for Reproduction.

To the best of our knowledge, these products are not manufactured using nano-engineered materials. The particle size range of the materials are outside the nano-material range of 1 - 100 nanometers (0.001 - 0.100 μm).

#### **Code of Conduct**

Please reach out to TECHNICALDOCUMENTS@mortonsalt.com to request a copy of the code of conduct.

# **Conflict Minerals**

To the best of our knowledge Morton Salt Inc. and Windsor Salt Ltd. products do not contain Tin, Tantalum, Tungsten, Gold.

#### **Continuing Guarantee**

Please request a general and continuing commodity guaranty for food grade products from <u>TECHNICALDOCUMENTS@mortonsalt.com</u>. The guaranty is applicable from Morton Salt, Inc. to direct customers only. Indirect customers must obtain a guaranty from their distributor, as we cannot provide a guaranty for products after it arrives at our direct customers' locations. The requested food guaranty applies to U.S. and Canadian regulations. It is up to the customer to determine if the product attributes are applicable to other countries.

#### **Date Code for Food Grade Products**

The date code for batch managed products consists of a ten-character code as follows:

FIRST TWO LETTERS PLANT CODE	TWO DIGIT YEAR	THREE DIGIT JULIAN DATE	THREE DIGIT SEQUENTIAL NUMBER
U.S. CC – Cape Canaveral, FL GR – Grantsville, UT GS – Grand Saline, TX HU – Hutchinson, KS MP – Manistee, MI RI – Rittman, OH SS – Silver Springs, NY <u>Canada</u> AN – Anjou, QC OJ – Ojibway, ON PW – Pugwash, NS RE – Regina, SK WN – Windsor, ON	17 – 2017 20 – 2020	01 – Jan 1* 01 – Jan 2** 060 – Mar 1* 061 – Mar 1** 365 – Dec 31* 366 – Dec 31 ** *Regular Year **Leap Year	Sequential number for each day /each batch

Example: HU17068007 – March 9, 2017 produced at Hutchinson, KS Plant ID/Year/Julian Date/Sequential Number

#### **Diacetyl Statement**

Products manufactured by Morton Salt, Inc and Windsor Salt Ltd. do not contain natural or synthetic Diacetyl (Butanedione or 2,3-Butanedione). The salt is not exposed or contaminated by Diacetyl during processing, storage, packaging, or handling.

#### Ethylene Oxide, Irradiation, Sewage Sludge

Products manufactured by Morton Salt and Windsor Salt are not subjected to ethylene oxide, ionizing radiation, or sewage sludge; nor, to the best of our knowledge, are any of the components of these products.

# Food Fraud

The safety and quality of the products made by Morton Salt, Inc. and Windsor Salt Ltd. are of utmost importance. The prevention of Food Fraud is important to protect our consumers and to maintain the integrity of our products as well as the trust of our customers. To protect our supply chain from food fraud, Morton Salt and Windsor Salt have implemented programs for the prevention and mitigation of food fraud that meet all requirements under 21 CFR Part 121 (Mitigation Strategies to Protect Food Against Intentional Adulteration). Each manufacturing facility has implemented a written food defense plan that includes training in accordance to 21 CFR § 121.4 and the following written elements:

- A vulnerability assessment, including required explanations, to identify significant vulnerabilities and actionable process steps
- Mitigation strategies for actionable process steps, including required explanations
- Procedures for food defense monitoring of the mitigation strategies
- Time based, or event triggered reanalysis of the plan

At each Morton Salt and Windsor Salt plant, appropriate actions are taken to ensure that purchased inventory conforms to the agreed upon requirements. These requirements are checked via inspection, testing or supplier analysis acceptance. These programs verify that all Morton Salt and Windsor Salt products remain un-adulterated and consistently provide the highest quality.

#### Food Grade Products Compliance Standards

Morton Salt, Inc. and Windsor Salt Ltd. food grade products are manufactured and labelled in accordance to the United States of America Federal Food, Drug and Cosmetic Act, as amended, and/or the Canada's Food and Drug Acts of Canada including the Safe Food for Canadians Act and are intended for sale in these respective geographies. These products are not intended or warranted to be labelled for sale in compliance with any other foreign regulatory standard or labeling requirements.

The manufacturing facilities are registered with the appropriate regulatory body, United States and/or Canada, for each country that they produce products for sale.

Please reach out to us if you require any further information in regards to foreign labeling or registration requirements.

#### **Food Packaging Materials**

All packaging materials used by Morton Salt for food grade products:

- meet the Federal, State and Local food safety regulations for direct or indirect contact with food. Specifically, our packaging containers meet applicable sections of 402, 404 and 409 of the Federal Food, Drug, and Cosmetic Act, as Amended and parts 174, 175, 176 and 177 of the Code of Federal Regulations Title 21 Food and Drugs.
- complies with the CONEG regulations concerning toxics in packaging. The sum of the incidental presence of the
  concentration levels of lead, mercury, cadmium and hexavalent chromium present in the packaging is less than
  100 ppm.

#### Food Safety and Modernization Act (FSMA)

Morton Salt, Inc. and Windsor Salt, Ltd. human food products are manufactured in accordance with policies in compliance with the Food Safety and Modernization Act provisions of:

- 21 CFR 117 Subpart B Current Good Manufacturing Practices
- 21 CFR 117 Subpart C Hazard Analysis and Risk-Based Preventative Controls which include, but are not limited to the following components:
  - Food Safety Plan
  - Hazard Analysis to identify and evaluate known or reasonably foreseeable hazards, including biological, chemical, physical and radiological hazards.
  - Preventive Control to significantly minimize or prevent foreseeable hazards.
  - Preventive Control Management (monitoring, corrective action, verification, validation and recordkeeping as appropriate to ensure the effectiveness of the preventive control).
  - Recall and Traceability Program

#### Food Safety Plan

Morton Salt, Inc. and Windsor Salt Ltd., as part of the Food Safety Plan, conducts risk assessments of our suppliers of food ingredients, process inputs, processing steps, packaging steps, and distribution steps. The risk assessments include biological, chemical, physical and radiological hazard analysis. Appropriate preventative controls are established where necessary to control and monitor hazards that pose a risk to human or animal health.

The risk assessment for purchased materials also includes an assessment for economically motivated adulteration. This assessment includes a review of the supplier relationship and history, FDA and/or CFIA alerts, trade association notices and review of the USP Food Fraud Database.

Morton Salt, Inc. and Windsor Salt Ltd., have developed and implemented Food Safety Plans (inclusive of Animal Feed Safety Plans where applicable) for its human and animal food grade products. Because of the proprietary nature of our Food Safety Plans, copies are not available for dissemination. Morton Salt, Inc.'s and Windsor Salt Ltd.'s Food Safety Plans and associated programs are reviewed during facility 3<sup>rd</sup> party certification audits and may be reviewed on a for

cause basis during a plant visit with prior notice and confidentiality agreements in place. For cause basis is to be determined by Morton Salt, Inc. and Windsor Salt Ltd.

In addition, Morton Salt, Inc. and Windsor Salt Ltd., human food grade facilities are GFSI Certified. The Food Safety Plans are reviewed as part of this audit and appropriate corrective actions are taken for any deficiency noted in the audit.

#### Generally Recognized as Safe (GRAS)

Per 21 CFR 182.1 (a), Salt is considered to be generally recognized as safe (GRAS) as a direct human food ingredient. 21 CFR 182.1 describes substances that are generally recognized as safe:

"(a) It is impracticable to list all substances that are generally recognized as safe for their intended use. However, by way of illustration, the Commissioner regards such common food ingredients as salt, pepper, vinegar, baking powder, and monosodium glutamate as safe for their intended use. This part includes additional substances that, when used for the purposes indicated, in accordance with good manufacturing practice, are regarded by the Commissioner as generally recognized as safe for such uses."

#### **HACCP and Preventive Control Plans**

Morton Salt, Inc. and Windsor Salt Ltd. have developed and implemented HACCP and Preventive Control Plans (here after known as Food Safety Plans) for their food grade products. Due to the proprietary nature of our plants, copies are not available for dissemination.

Morton Salt, Inc. and Windsor Salt Ltd. food grade facilities are GFSI certified. The Food Safety Plans are reviewed as part of audit processes and appropriate corrective actions are taken for any deficiencies noted during the audit.

#### **Halal Certification**

Morton Salt, Inc. does not have third party Halal certification of its products currently. However, to the best of our knowledge, our food grade products would be permitted by Islamic dietary law because they do not contain ethyl alcohol, L-cysteine, animal fats and/or extracts, blood, blood plasma, pork and/or other meat by-products.

#### **Heavy Metals**

The Heavy Metals test currently provided on the Certificate of Analysis includes all types of heavy metals including lead, mercury, cadmium, etc. If any one of these metals or a combination of these metals reaches the limit (2 ppm for food products), then the product is not acceptable as a food product. Therefore, the Heavy Metals test is equivalent or has a lower allowable limit for lead than a lead test by itself. To ensure that the procedure detects lead as a heavy metal, each analysis is run against a lead standard at 2 ppm. In each case, if the sample has less heavy metals than the lead standard, the product is approved and passes Food Chemical Codex and Codex Alimentarius.

#### **Kosher Certification**

Kosher certificate is provided upon request.

#### Microbiological

Food grade salt products are packed dry with less than 0.1% moisture. Any moisture present is saturated brine which exhibits an  $a_w$  of about 0.75. Dry salt will therefore have an  $a_w$  of 0.75 or less and is likely to approach an  $a_w$  of 0.0.

If the water activity is 0.85 or less in the finished product, it is not subject to the regulations of 21 CFR Parts 108, 113, and 114. The water activity of salt is below this threshold.

Sodium chloride and potassium chloride are bacteriostatic substances with a low water activity. Since these products do not support microbiological growth, microbiological standards are not included in the specification, nor are microbiological environmental studies performed at any Morton Salt or Windsor Salt facilities.

#### **Miscellaneous Substances**

During the production process of salt, Morton Salt, Inc. and Windsor Salt Ltd. do not use or intentionally add any of the following substances:

- Acetaldehyde
- Antibiotics, narcotic products, steroidal anabolic
- Artificial color, other colorants
- Artificial Sweeteners
- Asbestos
- Autolyzed Yeast extracts
- Azodicarbonamide
- BAC and DDAC
- Bee Products
- Benzoates, Benzoic acid, Parabens
- BHA/BHT/TBHQ or related compounds
- Biosolids or sludge
- Bleaching agents
- Brominated Vegetable Oil
- Caffeine and derivatives
- Carrot and products thereof
- Casein
- Cassava/Tapioca
- Cinnamon
- Cocoa and products thereof
- Coriander and products thereof
- Corn/ maize and products thereof
- Cremophor Emulsifiers
- Cumin
- Cyanuric acid
- Diacetyl
- 1, 2 dibromoethane
- Dimethylfumarate (DMF)
- Dimethylaminopropylamine (DMAPA)
- 1,4-Dioxane
- Dioxins and PCBs
- Disodium inosinate, Disodium Guanylate
- Enzymes
- Epichlorohydrin
- Ethyl alcohol, Alcohol and Polyols
- Ethyl bromide
- Flavoring substances
- Formaldehyde
- Fragrances
- Fruit
- Garlic
- Glutamates

- Gluten
- Glycerin / Glycerol
- Glycol and products thereof
- Histamines
- Honey and derivatives
- Hormones or hormone residues
- Hydrolyzed protein
- Lactose and products thereof
- Lanolin
- Latex
- Leaveners
- Lecithin
- Legumes and products thereof
- Lupin and products thereof
- Maleic acid
- Melamine
- Methylene glycol
- Mono- & di-glycerides
- Monochloropropanes
- Monosodium glutamate (MSG)
- Mushroom
- Nitrosamine
- N-Methylphenethylamine
- Nonylphenol ethoxylates
- Nutmeg
- Onion
- Palm oil, hydrogenated palm oil and refined oils
- Paprika
- Parabens
- Partially hydrogenated oils (PHOs)
- Pesticides, herbicides or residues
- Petrochemicals
- Petroleum
- Phenylalanines
- Polycyclic Aromatic Hydrocarbons (PAHs)
- Polydextrose
- Polyethylene sulfide (PPS)
- Polysaccharides (starch)
- Polyvinyl chloride (PVC)
- Propyl gallate
- Propyl para-hydroxybenzoate (INS 216) and its sodium salt, sodium propyl para-hydroxybenzoate (INS 217)
- Propylene glycol
- Propylene oxide
- Quaternary ammonium compounds
- rBST bovine growth hormone
- SLES or other alkyl ether sulfates
- SLS or other alkyl/alkoxy sulfates
- Styrene
- Sucrose, corn syrup, high fructose corn syrup, corn sugar, fructose, maltose, sucralose
- Sulfamides
- Titanium Dioxide

The information that is provided in this document is proprietary and CONFIDENTIAL to Morton Salt, Inc. and Windsor Salt Ltd./ Sel Windsor Ltée. This information is to be used only for the purpose intended by the requester. All other uses are expressly prohibited. The information contained in this document is accurate and correct to the best of our knowledge and is subject to

change by Morton Salt, Inc./Windsor Salt Ltd./ Sel Windsor Ltée without notice.

- Tocopherols
- Toluene
- Triclosan
- Vanillin
- Vinyl Acetate
- Vitamins
- Volatile organic compounds (VOCs)
- Yams
- Yeast

# Natural

In an effort to maintain transparency, Morton Salt, Inc. and Windsor Salt Ltd. have determined our guidelines for the definition of natural as "A product that is (i) free of colorants, artificial flavorings, artificial preservatives, synthetic anticaking agents, or synthetic additives; and (ii) untreated or (iii) treated using only natural or naturally derived ingredients and/or processes". This determination was made based on the following excerpt from "Use of the Term Natural on Food Labeling", www.fda.gov:

"Although the FDA has not engaged in rulemaking to establish a formal definition for the term "natural," we do have a longstanding policy concerning the use of "natural" in human food labeling. The FDA has considered the term "natural" to mean that nothing artificial or synthetic (including all color additives regardless of source) has been included in, or has been added to, a food that would not normally be expected to be in that food.

However, this policy was not intended to address food production methods, such as the use of pesticides, nor did it explicitly address food processing or manufacturing methods, such as thermal technologies, pasteurization, or irradiation. The FDA also did not consider whether the term "natural" should describe any nutritional or other health benefit."

The CFIA also has provided guidelines to the labeling of "natural" foods with the following:

"In general, a food can be described as "natural" if the following criteria are met, namely that the food and its ingredients: (i) do not contain, or have ever contained, an added vitamin, mineral nutrient, artificial flavouring agent or food additive; (ii) have not had any constituent or fraction thereof removed or significantly changed, except the removal of water; (iii) have not been subjected to processes that have significantly altered their original physical, chemical, or biological state."

Based on this information, it is the user's responsibility to determine if the product is considered "natural" for the labeling claims of your finished product

# **Notification of Change**

At Morton Salt, Inc. we are committed to maintaining the highest level of quality and food safety of the products we produce and deliver to our customers and consumers. We understand that communication in the supply chain is critical to manage through significant incidents and changes.

Morton Salt, Inc. will notify direct customers immediately of any events that may lead to a significant impact on product quality, food safety, or performance. These events may include, but are not limited to, the following:

- Systematic product quality defects or process control deviations which could lead to a recall or withdrawal of a Morton Salt, Inc. finished product.
- Inadvertent release from "Hold" of a customer material produced by Morton Salt
- Event or substance that could threaten product tampering or product security.
- Discovery of potentially defective or adulterated ingredients or packaging materials associated with product in distribution.

• Any event that leads Morton Salt, Inc. to suspect that a non-conformance (specification, regulatory, etc.) exists in product already shipped to the customer.

Morton Salt, Inc. will also notify direct customer prior to making changes to the manufacturing process that may have an impact on product specifications or performance. These changes may include, but are not limited to, the following:

- Packaging or processing changes that have an impact on the fit, form, or function of the product supplied.
- Ingredient changes that may impact customer labelling.
- Facility closure or changes in manufacturing locations
- Product discontinuation.

It is the responsibility of the direct customers of Morton Salt, Inc. to notify any third party users of the incidents and changes outlined above.

#### **Nutritional Value**

Values are based on analysis or calculated from contributions of ingredients and are typical for each product. Due to inherent variability, actual values may vary slightly. Please request the nutritional statement for the desired product via <u>TECHNICALDOCUMENTS@mortonsalt.com</u>. The units are per 100 g.

#### Organic

According to the USDA National Organic Program, salt cannot be certified as organic because salt is a mineral and not an agricultural product. As stated in 7 CFR 205.303(b)(1) and 7 CFR 205.304.(b)(1) "Water or salt included as ingredients cannot be identified as organic."

Morton Salt and Windsor Salt produce salts with and without anticaking agents. Salts produced without anticaking agents can be considered for use in organic products. Salts produced with anticaking agents can, in some cases, be considered for organic status. Contact Morton Salt at <u>TECHNICALDOCUMENTS@mortonsalt.com</u> for additional information.

Salts produced with tricalcium phosphate (calcium phosphate, tribasic) can be considered for organic status. Tricalcium Phosphate is an allowed synthetic for processed products labeled as organic or made with organic.

It is the customer responsibility to seek organic approval for the ingredients used in their product.

# Pesticide

Products manufactured by Morton Salt, Inc. and Windsor Salt Ltd. do not contain pesticide or pesticide residue. The salt is not exposed or contaminated by pesticides during processing, storage, packaging, or handling.

#### Phthalate and Bisphenol A

Morton Salt Inc. and Windsor Salt Ltd. food grade and USP grade products are composed of sodium chloride and/or potassium chloride with inorganic anti-caking agents in some products. The following Phthalate Esters are not known to be present in any of these products or in the packaging materials:

- Benzyl butyl phthalate (BBP)
- Dibutyl phthalate (DBP)
- Di-(2-ethylhexyl) phthalate (DEHP)
- Diisodecyl phthalate (DIDP)
- Diisononyl phthalate (DINP)
- Di-n-octyl phthalate (DnOP)
- Bisphenol-A (BPA)

This information is based upon knowledge of our manufacturing process and supply chain. Please note that we do not test our finished products for the actual presence of these compounds.

#### **Product Description**

The individual product descriptions are located in the respective Product Data Sheets (PDSs). This includes manufacturing origin descriptions, basic regulatory information and certifications, chemical properties, physical

properties, particle size, base manufacturing codes, storage and coding information and production and/or distribution facilities.

# **Quality Program**

Morton Salt, Inc. and Windsor Salt Ltd. have developed and implemented a Quality Program for their food grade products. Morton Salt and Windsor Salt Quality delivers high quality products by excelling at continuous improvement and ensuring safe and legally-compliant products that meet or exceed customer expectations. Due to the proprietary nature of our process, copies are not available for dissemination. The programs in place include but are not limited to:

- Allergen Control Program
- Carrier Approval Program
- Certificate of Analysis and Compliance
- Cleaning Program
- Control of Foreign Material
- Finished product / In-Process Control
- Glass and Brittle Plastics Program
- Good Manufacturing Practices
- Food Safety Plans / Hazard Analysis Critical Control Point
- Internal Auditing
- Nonconformance and CA/PA Procedures
- Pest Control
- Preventive Maintenance
- Recall Program
- Record and Document Management
- Supplier Approval Program
- Traceability Program for products produced
- Training Program

Morton Salt or Windsor Salt Quality Programs may be reviewed during a site assessment with prior notice. Please contact Mark Reynolds <u>MReynolds@mortonsalt.com</u>, Sr Mgr Corporate External FSQR & Audit, for further information and assistance.

#### **REACH Obligations**

This statement provides information concerning the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) regulations for products produced by Morton Salt, Inc. and Windsor Salt Ltd.

# SALT PRODUCTS WITHOUT ADDITIVES

# Salt (Sodium Chloride; CAS# 7647-14-5, EINECS #231-598-3)

Salt products that do not contain additives are considered minerals occurring in nature that are neither chemically modified nor dangerous according to Directive 67/548/EEC. They are therefore **exempt** from the obligation to register under the REACH regulations per:

ANNEX V

EXEMPTIONS FROM THE OBLIGATION TO REGISTER IN ACCORDANCE WITH ARTICLE 2(7)(b)

7. The following substances which occur in nature, if they are not chemically modified: minerals, ores, ore concentrates, cement clinker, natural gas, liquified petroleum gas, natural gas condensate, process gases and components thereof, crude oil, coal, coke.

8. Substances occurring in nature other than those listed under paragraph 7, if they are not chemically modified,

unless they meet the criteria for classification as dangerous according to Directive 67/548/EEC.

#### SALT PRODUCTS CONTAING YELLOW PRUSSIATE OF SODA AS AN ANTI-CAKING AGENT

Salt products containing Yellow Prussiate of Soda imported or marketed into the EU are exempt from the obligation to register under the REACH regulations if it is used in the following applications:

- Medicinal products for human or veterinary use
- Food or feeding stuffs
- As a food additive in food stuffs
- Animal nutrition

Per Title II of the REACH regulations per TITLE I- GENERAL ISSUES - CHAPTER 1- Article 2 Application 5a-5b

If the salt is not being used in one of the exempted applications, then there may be some obligation to register under REACH regulations. These products are considered a "preparation" (a mixture or solution composed of two or more substances) under the REACH regulations. Salt and Yellow Prussiate of Soda are the two substances in this preparation. The REACH regulations require that each substance be registered and not the preparation, however

the salt component is exempted from the registration requirements as stated above under SALT PRODUCTS WITHOUT ADDITIVES.

# Yellow Prussiate of Soda (a.k.a. Sodium Ferrocyanide or Tetrasodium hexacyanoferrate – CAS# 13601-19- 9, EINECS #237-081-9)

If the salt product is not used for an exempted application the Yellow Prussiate of Soda component of the salt product may need to be registered depending on the amount imported into the EU. The amount of Yellow Prussiate of Soda used in salt products is miniscule. The maximum amount of Yellow Prussiate of Soda in the salt products is 13 ppm or 0.0013%. REACH regulations apply to substances manufactured or placed on the market in quantities of one metric tonne (2,200 advp lbs.) or more annually. Approximately 84,615 short tons of salt containing Yellow Prussiate of Soda as an anticaking agent is equivalent to 2,200 advp. Lbs of Yellow Prussiate of Soda. If your salt usage approaches this threshold, please contact us for further information.

# SALT PRODUCTS CONTAINING CALCIUM PHOSPHATE TRIBASIC (Tricalcium Phosphate) AS AN ANTI- CAKING AGENT

Salt products containing calcium phosphate tribasic are exempt from the obligation to register under REACH regulations.

# Calcium Phosphate Tribasic (a.k.a. Tricalcium Phosphate, CAS #12167-74-7, EINECS #2151457)

This product is exempt from the obligation to register under the following REACH regulations: Title II of the REACH Regulations per TITLE I – GENERAL ISSUES – CHAPTER 1- Article 2 Application 55

The provisions of Titles II not apply to the extent that a substance is used:

(b) in food or feeding stuffs in accordance with Regulation (EC) No 178/2002 including use:

(i) as a food additive in food stuffs within the scope of Council Directive 89/107/EEC of21 December 1988 on the approximation of the laws of the Member States concerning food additives authorized for use in food stuffs intended for human consumption.

# Ready to Eat (RTE)

Ready to eat (RTE) food refers to "food that is normally eaten in its raw state or any other food, including a processed food, for which it is reasonably foreseeable that the food will be eaten without further processing that would

significantly minimize biological hazards.". Salt (NaCl) and KCl are bacteriostatic substances with a low water activity. For this reason, Salt and KCL do not support microbiological growth.

#### **Residual Solvents**

According to chapter <467> in the U.S. Pharmacopoeia, "Testing of drug substances, excipients, and drug products for residual solvents should be performed when production or purification processes are known to result in the presence of such residual solvents. It is only necessary to test for residual solvents that are used or produced in the manufacture or purification processes."

There are no ICH Class 1, 2, 3 or other Residual Solvents utilized in the processing of Morton Products. For this reason, we do not perform residual solvent testing nor list residual solvents on our COA. Additionally, we do not perform USP test methods on non-USP Salt. The only solvent utilized during salt production is water. Water is listed on the Certificate of Analysis as Moisture – Surface.

# Shelf Life

Morton Salt considers Sodium Chloride to be stable for an infinite period of time. Sodium Chloride is commonly known as a nonreactive chemical that does not break down. In fact, the salt deposits that are mined for many of our products were laid down millions of years ago. Since our process only dissolves this salt in water, and then the salt is recrystallized, the salt is not chemically changed it in any way. Therefore, the salt we produce is as stable as the original deposit.

Stability studies performed to date on Sodium Chloride have also not shown any change over time. For these reasons, no expiration date is applicable for Sodium Chloride. In addition, because the product is stable, no retest date is applicable.

#### Vegetarian and Vegan Product Suitability

Food grade products manufactured by Morton Salt and Windsor Salt are suitable for consumption by individuals following a vegan, lacto-ovo-vegetarian, or lacto-vegetarian diet. There is no exposure or contact to foods of animal origin in processing equipment, storage or handling procedures.

# World Anti-Doping Agency (WADA)

Food grade products manufactured by Morton Salt, Inc. and Windsor Salt Ltd. do not contain any materials on the World Anti-Doping Agency (WADA 2023), NSF 2017 or NFL/NFLPA 2022 lists of prohibited substances for athletes. There is no exposure to or contamination by these substances in processing equipment, storage, or handling procedures.

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