Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

ASH AND MOISTURE VALUES - PRODUCT INFORMATION

The Nutrition Data Sheets for our products include values for Ash and Moisture. Please note that this is not a mass balance declaration, and that the values for Ash and Moisture may not always add up to 100%, depending on the chemical substances involved.

Certain substances, such as some of the phosphates, have a lower measured Ash content vs. theoretical because there is a condensation reaction that can occur during the Ash determination. The subsequent loss of water molecules (due to the condensation reaction) through evaporation during the Ash method may result in a lower contribution to the measured Ash weight.

The measured moisture level in the products is typically carried out at a lower temperature than the Ash method. This Moisture value reflects the moisture level present in the product. It should be noted, however, that this Moisture value and the Ash value may not add up to 100% due to the reasons listed above.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

May 6, 2015

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

FACILITIES AUDIT REPORT POLICY

As a manufacturer of phosphates, phosphoric acid, and sulfates that meet food and/or pharmaceutical grade requirements, the manufacturing facilities for ICL Food Specialties (at ICL Performance Products LP and ICL Fosfatos y Aditivos México S.A. de C.V. locations) are occasionally audited by government agencies, quality and food safety associations, customers, and other organizations.

While we can provide our customers (upon request) with copies of our certificates from audits by certifying organizations, it is our policy that the reports from our facility audits are considered proprietary and company confidential.

All products from our company are manufactured and tested according to the appropriate regulations, guidelines, and/or good manufacturing practices, and meet all requirements for the specific grade of the product sold.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

February 25, 2014

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

ICL Performance Products LP

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-perfproductslp.com

ICL Fosfatos y Aditivos México S.A. de C.V.

California Transparency in Supply Chains Act of 2010

On January 1, 2012, the "California Transparency in Supply Chains Act of 2010" law went into effect. This legislation requires retail companies that do business in the state of California to disclose their efforts to ensure that their supply chains are in compliance with slavery and human trafficking laws.

In response to this law, and in efforts to eliminate slavery and human trafficking from supply chains, ICL acknowledges the following:

- ICL does not employ slaves or trafficked persons.
- ICL has taken steps to ensure that direct contractors do not employ slaves or trafficked persons. ICL verifies with its direct supply chain suppliers that they are not violating any laws regarding slavery and human trafficking.
- ICL's direct supply chain suppliers certify that materials incorporated in ICL's products comply with all local and federal laws regarding slavery and human trafficking in the country or countries in which the direct supply chain suppliers are doing business.
- ICL is considering conducting audits of its direct supply chain suppliers to ensure compliance with slavery and human trafficking laws.
- ICL is evaluating whether supplemental training and/or changes in accountability standards and procedures for employees and/or contractors are appropriate.

David Figueira
Supply Chain / Services Director
ICL Performance Products

July 30, 2012

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

ICL Performance Products LP

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
855-ICL-SPEC (855-425-7732)
www.icl-pp.com

ICL Food Specialties™

CERTIFICATE OF ANALYSIS - INFORMATION

ICL Performance Products, ICL Food Specialties (a division of ICL Performance Products), and ICL Fosfatos y Aditivos México S.A. de C.V. 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.

Every shipment of product from ICL is shipped with a Certificate of Analysis (CoA) or Certificate of Conformance that is specific to that lot of product. The CoA contains information that demonstrates that this specific lot of material meets our internal quality requirements and that it complies with the specifications for that product, including any additional previously-accepted customer requirements.

ICL's quality system requires that any product that does not conform to the stated specifications is not shipped to a customer. The only exception to this is if a non-conforming product is available and a customer is notified of the non-conformance prior to shipment of the product, and still approves/accepts the shipment and receipt of that particular lot.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

March 24, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

Clarification of FCC Requirements

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture high quality food grade products including phosphates, phosphate blends, phosphoric acid, sulfates, and adipic acid, which are high purity products intended for use as food ingredients. These products are intended for use in food applications, and are manufactured and tested according to the monograph specifications in the current edition of the *Food Chemicals Codex* (*FCC*). These specifications are reflected on our specification sheets for *FCC*-grade products.

According to the information in the front section of the *FCC*, titled "General Provisions and Requirements Applying to Specifications, Tests, and Assays of the *Food Chemicals Codex*," the characteristics included in the "Description" section of each *FCC* monograph are not requirements, but are provided as information that may assist with the overall evaluation of a food ingredient. Characteristics such as pH, solubility in various solvents, odor, and functions may be included in this Description section. Since these characteristics are not requirements, we do not include specifications for these descriptive parameters in our documentation.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

May 15, 2013

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

Webster Groves Technical Center
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1-855-ICL-SPEC (1-855-425-7732)
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CONTINGENCY STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) manufactures a variety of high purity food ingredients and specialty blends of food ingredients, including phosphates, phosphoric acid, sulfates, gums, adipic acid, and sea salt. Manufacturing sites are located worldwide, in the USA, Mexico, Germany, Brazil, and Israel. Selected products are, or can be, produced at more than one location. Through careful management of inventories, warehousing, and global reserve supplies, our contingency plans (in the unlikely event of a manufacturing interruption) are designed to prevent supply disruptions to our customers.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

December 4, 2013

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

ICL Performance Products LP

ICL Food Specialties™

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-pp.com

Customer Audit Policy

The purpose of this policy is to provide the guidelines for eligibility and scheduling customer audits at ICL Performance Products LP (PPLP) facilities, including those producing products that are sold within the ICL Food Specialties Division of ICL PPLP.

Eligibility: Customers who purchase at least 100,000 pounds of product per year from ICL are eligible to schedule audits at the producing locations based on a mutually agreed schedule and frequency. Customers should contact their Sales Representative to coordinate the audit.

Companies that do not meet the minimum volume threshold should contact their sales representative for discussion and/or to request alternative options. These alternatives could include our Third Party Food Safety / Quality Audit certificate and/or summary. One option for customers purchasing low volumes of products, but still requiring an on-site audit, may be a fee charged to the customer for this service.

Auditing: Audits will be one day or less and only in the production areas for the products produced for the customer. Only employees of the customer are allowed to audit. Customers should provide an agenda, scope of the audit, and applicable standards to be used during the audit.

Non-Disclosure Agreement (NDA): An ICL NDA is required, and must be finalized, prior to an audit.

May 14, 2013

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

Customer Feedback and Satisfaction

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture and/or market high quality phosphates, phosphoric acid, sulfates, sea salts, adipic acid, and other food ingredient specialty blends intended for use in foods. Although these products are manufactured according to food grade Good Manufacturing Practices, if there are issues which our customers bring to our attention regarding an order or shipment of our products, we will address it through a documented process. Our goal is to ensure the satisfaction of our customers with the purchase and use of our products.

If customers need to report an issue, they should contact their customer service representative or sales representative. Sales or customer service will enter the customer feedback as a report into a company-wide database when it is received. The process for receiving and addressing feedback from customers is documented in our internal Business Process Manual. Although this internal procedure is confidential, this document provides an overview of the process.

Depending on the type of feedback, the appropriate people in ICL are notified for investigation and response, and an investigator is assigned. The investigator will contact the customer to verify details of the situation, and will take any steps needed to thoroughly investigate the situation. Upon resolution of the issue, ICL will provide a letter to the customer outlining the root cause of the problem, as well as corrective actions that will be implemented. Records of the report and resolution are maintained in our company-wide database. The goals of this process are to provide customer satisfaction, and also to continuously improve our systems to prevent the situation from occurring in the future.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

November 4, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
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1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

DOCUMENTATION MANAGEMENT STATEMENT

ICL Food Specialties (a division of ICL Performance Products) provides various types of written technical information for our customers upon request. This documentation includes Product Data Sheets (which include product specifications and application information), Nutrition Data Sheets (which provide product-related information for nutrition labels) and Regulatory Statements (which provide information on compliance of our products with various regulations). Please note the following information regarding this documentation:

- These documents are revised and updated as needed, and also are reviewed at a minimum of every three years.
- The date listed on the documentation indicates the last date on which this information was updated.
- Documents are typically provided to customers in a secure format (e.g., pdf format) in order to ensure the integrity and authenticity of these documents, which is in compliance with the controls described in the FDA "Electronic Records; Electronic Signatures" regulations (21 CFR Part 11).

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

May 6, 2013

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

Webster Groves Technical Center
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Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
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WARRANTY OF FDA FOOD FACILITY REGISTRATION

The U.S. Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (Bioterrorism Act), which amended Section 415 of the U.S. Federal Food, Drug, & Cosmetic Act (FDCA), and the Food Safety Modernization Act (FSMA) of 2011 require domestic and foreign facilities that manufacture, process, pack or hold food for consumption in the United States to register with the U.S. Food & Drug Administration (FDA).

This statement is to inform customers of ICL that all of our company's facilities that manufacture, process, pack or hold food grade ingredients for sale in the U.S. have been properly registered with the FDA. This includes ICL facilities in the following locations: St. Louis, MO; Lawrence, KS; Monterrey, Mexico; Sao Jose dos Campos and Sao Bernardo do Campo, Brazil; Ladenburg, Germany; Sedom, Arava and Kiryat Shmona, Israel. It also includes contracted facilities that manufacture, pack or hold ICL's food grade ingredients. These registrations are reviewed and updated as needed, and have also been renewed as required by the FDA during the Fourth Quarter of 2014 to remain in compliance with requirements in the U.S. Food Safety Modernization Act.

Some customers have requested that we provide a facility FDA registration number as evidence of a facility's registration. An FDA registration number alone would have no particular value to a customer, due to confidentiality provisions of the Bioterrorism Act. Instead of providing registration numbers, ICL is providing this letter of warranty that should be sufficient for your company's registration records.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

December 9, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-pp.com

Food Grade Ingredients - Regulatory Information

The safety and quality of the foods that we consume are the result of regulatory systems and processes involving compliance and participation by all facets of the food production chain. It is the responsibility of those involved in producing food (raw materials and ingredients suppliers, distributors, food product manufacturers, etc.) to comply with regulations for food products to ensure a safe and high quality food supply. ICL Food Specialties is committed to the manufacture of food ingredients that are high quality and safe for use in foods, and in accordance with the current regulations.

The regulations for Good Manufacturing Practice (GMP) in manufacturing, packing, or holding human food are found in Title 21 of the Code of Federal Regulations (CFR), Part 110. This chapter of Title 21 in the CFR provides information from the U.S. Food and Drug Administration regarding food for human consumption.

According to these regulations and to the Federal Food, Drug, and Cosmetic Act (Section 201(f)), the term "food" also includes raw materials and ingredients used in preparation of other food articles. In addition, the CFR states that ingredients added to achieve a technical effect in foods must be Generally Recognized as Safe (GRAS). In order to be considered GRAS, ingredients must be of an appropriate food grade, must be prepared and handled as food ingredients, and must be used at appropriate levels in foods [21 CFR 182.1(b)(3)] and [21 CFR 184.1(b)]. Specifications to define an appropriate food grade can be found in the Food Chemicals Codex (FCC), which defines the quality of food ingredients in terms of identity, strength, and purity, which are based on the elements of safety and good manufacturing practice.

It is our obligation as a supplier to food companies and distributors of our food ingredients, to inform our customers that in order to be in compliance with the above federal regulations, raw materials and ingredients to be used in food production must meet the requirements of food grade. Therefore, only our Food / FCC grade products should be used by our customers in their production of food for human consumption. Other grades of our products, that have not been manufactured and tested according to the current GMPs for human food (e.g., technical grades), should not be used as ingredients in foods.

If there are any questions regarding the use of our food ingredients and compliance with these food regulations, please contact us.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

January 16, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

FOREIGN MATERIAL CONTROL STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V are manufacturers of high quality food grade ingredients, which are produced under current Good Manufacturing Practices (cGMPs). According to the U.S. Food and Drug Administration's cGMPs for food ingredients (21 CFR 110), the current U.S. Food Safety Modernization Act (FSMA), and Global Food Safety Initiative (GFSI - FSSC22000) requirements, our company has written policies that are implemented at our manufacturing sites to ensure that all precautions are taken to manage finished product contamination (which includes detecting, preventing and controlling) from the environment, equipment or storage conditions.

A risk-based assessment from the purchase and receipt of raw materials to the shipment of finished goods has been conducted as part of each facility's HACCP program to determine any potential risk of contamination (unintentional and/or intentional).

The following programs are in place to assist with the management of contamination:

- Chemical Control Program
- Corrective and Preventative Action Program
- Food Defense Programs
- Glass, Brittle Plastic and Ceramics Program
- GMP Requirements and Personal Hygiene Programs
- HACCP
- Housekeeping and GMP Inspections
- Magnets (specific product lines only)
- Maintenance and Preventative Maintenance Programs
- Management of Change
- Master Sanitation
- Metal Detection
- Non-Conforming Product Program
- Pest Control
- Sifter Screens (specific product lines only)
- Storage, Shipping and Transportation Programs
- Supplier Management Programs
- Training

The following statements address allergen and microbiological contamination:

Allergen Statement

Microbiological Testing Statement

Please contact one of our Documentation Coordinators (ICL.CustomerInquiry@icl-pplp.com) if you have any questions regarding this information.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

November 19, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

FORMALDEHYDE - FREE STATEMENT

ICL Food Specialties (a division of Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture high quality food grade phosphates, phosphoric acid, and sulfates, which are produced according to current Good Manufacturing Practices (GMP) for manufacturing, packing, and holding human food (Title 21, Code of Federal Regulations, Part 110). These food ingredients are inorganic materials, which do not contain organic components such as formaldehyde.

There would be no reason for contaminants such as formaldehyde to be present in our inorganic-based food ingredients or in the raw materials used to produce these food ingredients. Therefore, although we do not test for formaldehyde in our food grade ingredients, we can guarantee that they are not present in these products, based on the inorganic nature of our products and on our carefully controlled manufacturing and testing processes.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

February 25, 2014

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

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1-855-ICL-SPEC (1-855-425-7732)
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FSMA (Food Safety Modernization Act) Compliance

ICL Food Specialties (a division of ICL Performance Products LP) 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.

The Food Safety Modernization Act (FSMA), which was signed into law in the U.S. on January 4, 2011, is a new law intended to improve safety of the food supply through prevention of such issues. The FSMA contains several provisions, which are being addressed through the process of proposed rules, comment periods, and final rule publication and implementation.

ICL Food Specialties is compliant with the current finalized provisions of the FSMA, is actively involved with reviewing and commenting on proposed FSMA rules on additional provisions through our trade association for food ingredient manufacturers, and also intends to meet all additional finalized rules for FSMA before or by the mandated implementation dates.

Food safety is an important focus within ICL Food Specialties. Our manufacturing facilities (in the U.S., Europe, Mexico, and Brazil) have been certified to comply with the Food Safety System Certification (FSSC) 22000 standard. In order to comply with this international standard, we have undergone extensive reviews, documentation, and audits of our food safety management systems, which also include aspects of the main areas of the FSMA. FSSC 22000 is one of the food safety system certification programs approved by the Global Food Safety Initiative (GFSI), which is a worldwide Foundation Board with the goal of improving food safety throughout the food chain.

As additional provisions and guidance become available from the U.S. Food & Drug Administration regarding various sections of the FSMA, we will continue to evaluate our food safety systems to ensure that we remain in compliance with these food safety regulations.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

October 10, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

Global Food Safety Initiative (GFSI) – FSSC 22000 Certification

The Global Food Safety Initiative (GFSI) is a worldwide standard with the goal of improving food safety throughout the food chain. This standard has approved multiple types of food safety auditing schemes, so that companies involved in the food industry can select the food safety system that is most appropriate for their segment of the food industry.

After careful evaluation of the available systems, ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V., have selected the FSSC (Food Safety System Certification) 22000 standard for implementation. This standard is a combination of two food safety standards: ISO 22000 and ISO/TS 22002-1. This GFSI-approved food safety management system will provide further opportunities for our company to strengthen our commitment to food safety in all aspects of our business as a food ingredient manufacturer.

ICL's primary food ingredient manufacturing sites in the U.S. and Mexico completed certification audits for the FSSC 22000 standard near the end of 2011 and have received these compliance certificates, which are available upon request. All of our manufacturing sites are also ISO 9001 certified for our quality systems. If you need additional information regarding implementation of food safety standards at any of our global manufacturing locations, please contact us.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

July 9, 2014

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

ICL Performance Products LP

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-perfproductslp.com

ICL Fosfatos y Aditivos México S.A. de C.V.

GLASS, BRITTLE PLASTICS, AND CERAMICS POLICY

ICL Performance Products LP and ICL Fosfatos y Aditivos México S.A. de C.V are manufacturers of high quality food grade ingredients, which are produced under current Good Manufacturing Practices (cGMPs). According to the U.S. Food and Drug Administration's cGMPs for food ingredients (21 CFR 110), the current U.S. Food Safety Modernization Act, and Global Food Safety Initiative (GFSI - FSSC22000) requirements, our company has written policies that are implemented at our manufacturing sites regarding the use of glass, hard plastic, brittle plastic, and/or ceramics in production areas.

These policies are designed to prevent contamination of our food grade products from any source, including fragments from production materials in the event of breakage. Brittle materials are not used in production areas unless absolutely necessary, and if they are used, then strict tracking, regular inspections, and complete documentation are required to ensure that our products are free from contamination with particles from glass, hard plastic, brittle plastic, ceramics, or similar breakable materials.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients

February 22, 2012

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

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

April 5, 2016

"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.

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

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GOOD MANUFACTURING PRACTICE STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture 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 the U.S. and Mexico 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.

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.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

September 9, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

GRAS Status of Potassium Phosphates

ICL Performance Products LP is a member of the International Food Additives Council (IFAC), a trade association that focuses on regulatory issues for food additives. In 2003, IFAC requested that the food law firm of Covington & Burling submit a petition and inquiry to the U.S. Food & Drug Administration (FDA), regarding the status of phosphates Generally Recognized as Safe (GRAS) for use in foods.

On October 10, 2003, a letter was received from the FDA in response to the Covington & Burling petition. This letter, which is attached, states that certain phosphates that have not previously been listed as GRAS under regulations in 21 CFR 182 or 184, can also be considered GRAS when used in accordance with good manufacturing practice. This is based on the GRAS determination performed by the Select Committee on GRAS Substances (SCOGS).

These phosphates include the following ICL products:

- Tetrapotassium Pyrophosphate (TKPP)
- Potassium Tripolyphosphate (KTPP)
- Monopotassium Phosphate (MKP)
- Tripotassium Phosphate (TKP)

In addition, the FDA agreed that these and other phosphates (including Dipotassium Phosphate, Sodium Hexametaphosphate, and Tetrasodium Pyrophosphate) already listed in the CFR are GRAS for use in food generally, as multi-purpose food ingredients, up to the limit of good manufacturing practice.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

February 3, 2014

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

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
College Park, MD 20740

October 10, 2003

Clausen Ely, Jr.
Covington & Burling
1201 Pennsylvania Ave.
P.O. Box 7566
Washington, D.C. 20044-7566

Dear Mr. Ely:

The Food and Drug Administration (FDA) is responding to the notice, dated August 6, 2003, that you submitted as an agent, on behalf of the International Food Additives Council (IFAC) in accordance with the agency's proposed regulation, proposed 21 CFR 170.36 (62 FR 18938; April 17, 1997; Substances Generally Recognized as Safe (GRAS)). The notice states that the IFAC has determined that potassium phosphate (mono-, di-, and tribasic), calcium hexametaphosphate, calcium pyrophosphate, tetrapotassium pyrophosphate, potassium tripolyphosphate, sodium hexametaphosphate, tetrasodium pyrophosphate, and sodium tetraphosphate are GRAS for use in food generally, as multi-purpose food ingredients, up to the limits of good manufacturing practice.

Some of the substances that are listed in the GRAS notice that you submitted are presently regulated under 21 CFR 182, substances generally recognized as safe. Specifically: calcium hexametaphosphate is regulated under 21 CFR 182.6203; calcium pyrophosphate is regulated under 21 CFR 182.8223; sodium hexametaphosphate is regulated under 21 CFR 182.6760; sodium pyrophosphate is regulated under 21 CFR 182.6787; tetrasodium pyrophosphate is regulated under 21 CFR 182.6789 (the agency notes that sodium pyrophosphate and tetrasodium pyrophosphate are the same compound); dipotassium phosphate is regulated under 21 CFR 182.6285. The remaining substances, tetrapotassium pyrophosphate, potassium tripolyphosphate, potassium phosphate (mono- and tribasic), and sodium tetraphosphate are not explicitly regulated under parts 182 or 184 (direct food substances affirmed as generally recognized as safe), however, these phosphate compounds have been reviewed by the Select Committee on GRAS Substances (SCOGS) and were determined to be GRAS for their intended use. The agency has no reason to question the GRAS determination performed by the SCOGS when used in accordance with good manufacturing practice.

If you have any further questions concerning this matter, please do not hesitate to contact me at (202)-418-3032 or lhighbar@cfsan.fda.gov.

Sincerely,

Lane A. Highbarger
Division of Biotechnology
And GRAS Notice Review
Office of Food Additive Safety
Center for Food Safety
And Applied Nutrition

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

GUARANTEED ANALYTICAL RESULTS

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture 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. These products are tested according to their specifications, and the analytical results are provided to customers in a Certificate of Analysis (COA).

Some of the analytical results may be listed on the COA as "guaranteed". For these routine tests, it has been determined that it is statistically unlikely to fail to meet that particular specification, so the test is run on a frequency basis rather than on each individual lot. (This determination is made through statistical analysis of extensive process and/or historical data for that product.) Corporate quality procedures ensure that only when certain process capability parameters are met ($Cpk \geq 1.33$), will the test be eligible for transfer to a frequency-based analysis program. The frequency testing and statistical data are maintained by each manufacturing site in compliance with corporate document control policy.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

July 24, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

HEAVY METALS TESTING IN FCC GRADE PRODUCTS

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture and/or market 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.

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 for ICL's FCC-grade products, and instead, more specific analyses are required to test for certain individual metal impurities, as specified in the current FCC monographs.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

April 30, 2013

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

ICL Facility Assessment Checklist

Company name	ICL Food Specialties (a division of ICL Performance Products LP)	www.icl-perfproductslp.com
Address & Phone Number	622 Emerson Road, Suite 500 St. Louis, MO 63141 855-ICL-SPEC (855-425-7732), Option 2	After Hours Emergency Coverage Beeper Number: 314-294-8462 24-Hr Emergency Transportation: 800-424-9300
Management structure	Company Organizational Chart Attached	
Date business was established	November, 2005	
2013 ICL Corporate Sales	$6.3 Billion	
ICL Manufacturing Sites	Size of manufacturing facility	Number of employees at facility
Carondelet Plant (Established 1876)	20 Acres	~150 total 100 hourly; 50 salary; 10 in quality
Lawrence Plant (Established 1957)	32 Acres	~155 total 100 hourly; 55 salary; 15 in quality
Monterrey Plant (Established 1960)	13,500 m^2	~133 total 100 hourly; 33 salary; 9 in quality
Technical resources on Plant Sites	Quality Control and Quality Assurance	
Type of products manufactured	Phosphoric Acid and Phosphate Salts	
Quality system development	Meet GFSI Requirements – See attached statement	All ICL Plants

Audit summary for manufacturing facilities		Date Last Inspected and / or Certification Expiration:
ICL Carondelet Plant 8201 Idaho Ave. St. Louis, MO 63111 PH: 785.749.8123 Cell: 785.312.2548 Paola Benitez, Quality Manager	FSSC 22000:2011	Jan 20, 2015 - valid through Jan 20, 2018
	ISO 9001:2008	May 21, 2015 - valid through May 21, 2018
	FDA	August, 2013
	HALAL	Jan 1, 2015 - valid through Dec 31, 2015
	Kosher	Aug 1, 2015 - valid through July 31, 2016
ICL Monterrey Plant Via Matamoros 1503 Ind. Nogalar San Nicolas de los Garza N. L. Mexico 66484 PH: 011-52-81-8625-2614 Carlos Arzola, Quality Manager	FSSC 22000:2011	Jan 6, 2015 - valid through Jan 6, 2018
	ISO 9001:2008	Sept. 18, 2014 – valid through Sept. 28, 2017
	SSA (Health Department)	November 19, 2013
	HALAL	Jan 1, 2015 - valid through Dec 31, 2015
	Kosher	Aug 1, 2015 - valid through July 31, 2016
ICL Lawrence Plant 440 N. Ninth Street Lawrence, KS 66044 PH: 785.749.8123 Cell: 785.312.2548 Paola Benitez, Quality Manager	FSSC 22000:2011	Nov 24, 2014 - valid through Nov. 24, 2017
	ISO 9001:2008	Aug 24, 2012 - valid through Aug 24, 2015
	FDA	February, 2014
	HALAL	Jan 1, 2015 - valid through Dec 31, 2015
	Kosher	Aug 1, 2015 - valid through July 31, 2016

ICL Facility Assessment Checklist

1		FOOD SAFETY AND QUALITY POLICY	Y	N	N/A
	a	A Food Safety and Quality Policy is documented and communicated to all levels of the organization.	√		
	b	An organizational chart illustrates positions responsible for compliance to the Food Safety and Quality System. The Quality Department is separate from the Operations Department.	√		
	c	Plant facilities have an up-to-date Food Safety and Quality Manual with written lab procedures.	√		
	d	Food Safety and Quality System records are retained for 3 (+Current) years.	√		
	e	Food Safety and Quality System effectiveness reviews (includes a review of continuous improvement initiatives) are conducted at least annually.	√		
	f	The Quality System is ISO certified.	√		
	Comments:	None			

2		REGULATORY AND INDUSTRY COMPLIANCE	Y	N	N/A
	a	Manufacturing sites are registered with the U.S. FDA under the Bioterrorism Act.	√		
	b	Registration date (of this facility) with the FDA: Re-registration was November, 2014			
	c	Processes, products, training, and records comply with applicable state, local, and Federal regulations.	√		
	d	There is a pre-established procedure for handling regulatory inspections whether planned or unscheduled?	√		
	e	Management ensures that employees are trained to manage the regulatory inspection process.	√		
	f	The regulatory inspection procedures require duplicate samples be collected and inventory be held when samples are taken by the regulator.	√		
	g	All documented non compliance issues noted by regulatory authorities during the previous twelve months have been resolved. [see comment below]			√
	h	Customers are notified if their product is not in regulatory compliance.	√		
	Comments:	There have been no regulatory non-compliance issues in the past 12 months.			

3		VENDOR APPROVAL	Y	N	N/A
	a	There is a Vendor Approval Program for ingredients, food contact packaging and services affecting food safety and quality.	√		
	b	An "Approved Vendor List" is utilized for raw material purchases.	√		
	c	Vendors are approved by manufacturing facility location.	√		
	Comments:	None			

4		RAW MATERIAL INSPECTION, PRODUCT HANDLING, STORAGE & DELIVERY	Y	N	N/A
	a	Incoming materials are verified as conforming to written specifications, from approved vendors.	√		
	b	The Quality Department is responsible for releasing raw materials after approving.	√		
	c	Raw materials are purchased according to written approved specifications.	√		
	d	The raw material supplier is included on a list of approved vendors.	√		
	e	A process to change or modify specifications is documented.	√		
	f	Inspection and test results are available for raw materials, work-in-process, and finished goods.	√		
	g	There are control procedures for rework products.	√		
	h	Suppliers provide a Certificate of Analysis for each shipment.	√		
	i	*Storage and receiving areas are inspected regularly to ensure that:*			
	1	Stored goods are protected from damage, contamination and deterioration.	√		
	2	Temperature-sensitive items are maintained at proper temperatures. [see comment below]			√
	3	Carriers are routinely inspected for acceptability. This is managed through ICL North America Logistics.	√		
	4	Pallets are managed for contamination, unsanitary and physical conditions.	√		
	5	Bulk raw materials are protected against contamination during unloading and loading.	√		
	6	A schedule of inbound materials includes condition of storage and shelf life.	√		
	7	Materials are used and shipped with a suitable rotation to prevent degradation.	√		
	8	Returned goods are handled to protect them from contamination or the contamination of other goods.	√		
	9	Raw materials, packaging supplies and/or finished goods are stored at offsite warehouses. [see comment]	√		
	10	If an offsite, 3rd party warehouse is used, are they inspected by the suppliers Quality Department and reports are available for review?	√		
	Comments:	Products are not considered to be temperature or humidity sensitive. FAM location stores all raw materials in house and do not utilize outside warehouse.			

ICL Facility Assessment Checklist

5		LABORATORY CONTROLS & ANALYTICAL TESTING	Y	N	N/A
	a	Physical analytical testing is performed in-house at this facility.	√		
	b	Laboratory methods are validated for accuracy and reproducibility.	√		
	c	This facility verifies that analysts are capable of performing laboratory procedures with accuracy and precision.	√		
	d	Effective controls are in place that prevent laboratory from becoming a source of contamination to production areas and products?	√		
	e	Laboratory procedures follow recognized and/or official methodology. [see comment below]	√		
	f	Manufacturing facilities periodically confirms that: 1) test methods are accurate at the stated limit of detection; 2) quantitative methods are accurate throughout the desired range and; 3) established procedures are followed.	√		
	g	The laboratory has a documented equipment calibration program which includes calibration frequencies.	√		
	h	Analytical testing is in place, where applicable, to confirm declared data or to ensure that the physical/chemical targets of the product specifications are met.	√		
	i	Analytical testing includes in-process and finished products, ingredients and the environment as appropriate to products manufactured.	√		
	j	The Certificate Of Analysis (COA's) contains information as listed on the Product Data Sheet. [see comment below]	√		
	Comments:	Some analytical tests may be guaranteed values. The laboratory testing for Food Grade material is based on the Food Chemicals Codex. Laboratory practices and production facilities follow 21 CFR 110 cGood Manufacturing Practices. See Food Grade Requirements Statement and GMP Statement.			

6		FINISHED GOODS INSPECTION & RELEASE	Y	N	N/A
	a	All product releases must conform to customer specifications that have been approved through the Customer Specification Process.	√		
	b	The Quality Department is responsible for the release of acceptable products.	√		
	c	Applicable analytical tests are defined for all products and documented procedures are available.	√		
	d	For products that do not meet specifications, there is a program in place to manage this material. See Non-Conforming Product section.	√		
	e	Systems are in place for managing and controlling all Quality records according to procedures.	√		
	f	This facility has procedures and requirements regarding shelf life and release status of finished goods.	√		
	Comments:	None			

7		FOREIGN MATERIAL CONTROL	Y	N	N/A
	a	Procedures and devices are in place for foreign material control, i.e. metal detectors, magnets, and screens.	√		
	b	Corrective action is taken if a metal detector or other foreign material detection device is found to be non-operational.	√		
	c	There is a documented procedure for the prevention of glass, brittle plastic and ceramic contamination.	√		
	d	All lights and windows within the manufacturing facility are routinely inspected to confirm that they are adequately covered to prevent accidental breakage.	√		
	e	Employees are trained annually on the procedures for prevention of foreign material, including but not limited to glass and brittle plastic, metal, wood, etc.	√		
	Comments:	HACCP risk assessments determine the risk of foreign material contamination throughout the process. See HACCP Statement and Glass, Brittle Plastic and Ceramic Statement.			

8		GMPs & PERSONNEL PRACTICES	Y	N	N/A
	a	A GMP Program meeting regulatory requirements is documented and implemented.	√		
	b	This facility has an apparel policy that protects product from damaged or poorly designed clothing or apparel unsuited for the food manufacturing environment.	√		
	c	The apparel policy includes restrictions against clothing materials that may cause foreign material contamination?	√		
	d	There are restrictions on eating/drinking, jewelry, smoking and personal effects in production and warehouse areas. Appropriate signs are posted when necessary.	√		
	e	There are hand-washing facilities (and signs posted on how to wash hands) for rest rooms, break areas and manufacturing areas).	√		
	f	Employees with symptoms of illness or open cuts/lesions are excluded from food handling jobs.	√		
	g	GMP training is conducted at least yearly and documented accordingly.	√		
	Comments:	See GMP Statement			

ICL Facility Assessment Checklist

9		HACCP PROGRAM	Y	N	N/A
[Program is confidential, details may be reviewed during in plant audits]					
	a	A multidisciplinary HACCP/Hazard Prevention team exists with assigned overall responsibility for developing, modifying, implementing and maintaining the HACCP system.	√		
	b	The HACCP team meets regularly to evaluate the current Hazard Prevention program. At least yearly, when there are changes or when non-conformances occur.	√		
	c	A hazard analysis has been performed for each applicable product.	√		
	d	HACCP preliminary steps and hazard analysis were conducted prior to developing the HACCP plan.	√		
	e	The HACCP plans include CCPs, critical limits, monitoring activities, corrective actions, verification procedures, validation and record keeping procedures.	√		
	f	Corrective actions to CCP deviations are predetermined and fully documented.	√		
	g	Employees receive annual training in HACCP.	√		
	h	Verification to the HACCP plan occurs annually, or whenever there is a change to the process, critical limits, raw material suppliers, etc. or from findings during customer audits or 3rd party audits.	√		
	i	Re-validation of the HACCP plan and the subsequent critical limits occurs annually and is based on scientific or plant specific information.	√		
	Comments:	See HACCP Statement			

10		MASTER SANITATION PROGRAM	Y	N	N/A
	a	All ICL manufacturing sites have written sanitation documentation and verification programs in place for plant and equipment.	√		
	b	There are written standard operating procedures for equipment and facility sanitation.	√		
	c	Brushes and other utensils used for cleaning food product contact surfaces are controlled and clearly identified. Color coding is used when appropriate.	√		
	d	Brush handles are made of synthetic material and bristles are food grade plastic or nylon. Exclusion of wood items occurs when possible.	√		
	e	Measures are in place to verify and monitor the effectiveness of cleaning methods.	√		
	Comments:	None			

11		INTERIOR & EXTERIOR FACILITY ATTRIBUTES	Y	N	N/A
	a	ICL facility sites and buildings are of suitable size, construction and designed to facilitate maintenance and sanitary operations.	√		
	b	The plant site, grounds and exterior building construction are maintained in a condition that protects against the contamination of food products and interior of the facility.	√		
	c	Within the manufacturing plants there are environmental controls (controlled temperature, air filtration, humidity, lighting, etc.) where appropriate.	√		
	d	Floor plan and process flow routes are on file.	√		
	Comments:	None			

12		WATER, STEAM & AIR	Y	N	N/A
	a	A water monitoring program is in place and includes testing for potability at an approved outside laboratory.	√		
	b	Water source is noted as either well water or city water.	√		
	c	All water sources are equipped with backflow prevention devices. These devices are included in the preventative maintenance program and inspected at least yearly.	√		
	d	Does steam ever come in contact with product or a food contact surface (i.e., cleaning)?	√		
	e	If steam is used during the manufacturing process, are boiler chemicals rated for food contact?	√		
	f	If air is used in the process, it is filtered to the smallest size possible. Any risk associated with product contact is evaluated in the HACCP risk assessment.	√		
	Comments:	Steam is used for some equipment (pumps, feed lines, etc.)			

ICL Facility Assessment Checklist

13		EQUIPMENT INSPECTION & CONTROL	Y	N	N/A
	a	New equipment design and installations are approved for sanitary requirements.	√		
	b	All food product contact surfaces are made of materials appropriate to the application.	√		
	c	A program for process equipment calibration is in place.	√		
	d	A program for laboratory equipment calibration is in place	√		
	e	Those conducting the calibration (both internal and external calibration technicians) are properly trained and certified.	√		
	Comments:	None			

14		PLANT MAINTENANCE PROGRAMS	Y	N	N/A
	a	A corrective and or preventive maintenance program is in place and is effective	√		
	b	The corrective and/or preventive maintenance program includes:			
	1	a list of all food product handling equipment;	√		
	2	maintenance frequencies;	√		
	3	training for maintenance personnel;	√		
	4	accountability for each component of the program;	√		
	5	maintenance records;	√		
	6	logging of emergency maintenance;	√		
	7	inventory control for maintenance parts to ensure that there is an accounting for parts after repairs and prior to production;	√		
	8	includes instructions for temporary repairs	√		
	Comments:	None			

15		CHEMICAL CONTROL	Y	N	N/A
	a	A chemical control program is used to manage the use, storage, and handling of non- food chemicals.	√		
	b	MSDS sheets are available for all non-food chemicals.	√		
	c	Lubricants and process aids which could come in contact with product that are used in manufacturing areas are food grade.	√		
	Comments:	None			

16		INTERNAL AUDITS	Y	N	N/A
	a	Internal audits of the Food Safety and Quality Systems are conducted annually.	√		
	b	Audit reports include details regarding items inspected, corrective action required, assigned dates for completion of corrective action and individuals responsible for the completion of the corrective action.	√		
	c	A Food Safety, Quality, Safety and GMP walkthrough (aka Housekeeping) will occur monthly. Items or deficiencies noted during walkthrough will be addressed immediately or as quickly as possible.	√		
	d	On site audits of ICL plant facilities, procedures and practices related to food safety are negotiable.	√		
	Comments:	None			

17		SPECIFICATIONS & STATISTICAL PROCESS CONTROL	Y	N	N/A
	a	Customer-specific specifications are evaluated, approved and controlled.	√		
	b	Statistical process control procedures ensure conformance to specifications.	√		
	c	Current procedures are available for operators for all prescribed processing and packaging quality or food safety checks.	√		
	d	In-process and/or finished products are inspected and tested to ensure conformance to the appropriate specifications and requirements.	√		
	e	Statistical process control is utilized to ensure continual improvement of the quality and food safety programs at each facility.	√		
	Comments:	None			

ICL Facility Assessment Checklist

18		PEST CONTROL	Y	N	N/A
	a	A documented pest control program is in place at this manufacturing facility.	√		
	b	A certified licensed pesticide contractor performs pesticide applications.	√		
		ICL Location / Contractor's License #			
		Carondelet Plant — Presto X, LC 6784510			
		Lawrence Plant — Presto X, LC 6784510			
		Monterrey Plant — Ecolab, 2012-191A81			
	c	Building exterior is protected from rodent and pest entry.	√		
	d	The pest control program includes defined inspections weekly or as needed basis.	√		
	e	Corrective action is taken for each noted deficiency.	√		
	f	"Restricted Use" pesticide applications are performed by a licensed pest control contractor.	√		
	g	Written procedures for the application of pesticides are maintained and enforced.	√		
	h	All chemicals used in pest control are accurately labeled and stored securely and MSDS are on file.	√		
	i	The Quality Department audits the performance of the pest control inspection and corrective action.	√		
	Comments:	None			

19		ALLERGENS & SENSITIVE INGREDIENTS	Y	N	N/A
	a	ICL products are free from food allergens (i.e. peanuts, tree nuts, dairy, egg, fish, shellfish, soy, wheat/grains containing gluten, sulfites) and sensitive chemicals, such as Tartrazine.	√		
	b	ICL products do not share equipment with any allergen raw materials in processing; therefore there is no cross-contamination of products with undeclared allergens.	√		
	Comments:	See Allergen Statement			

20		MICROBIOLOGICAL TESTING	Y	N	N/A
	a	Microbiological testing is not done on ICL phosphoric acid and inorganic phosphate salts.	√		
	Comments:	See Microbiological Statement (Some testing is performed under customer requirement)			

21		TRACEABILITY AND RECALL PROGRAM	Y	N	N/A
	a	All ingredients and packaging supplies are assigned and/or identified by Lot Numbers at Receiving.	√		
	b	A documented Recall Program is in place and traceable through distribution from receipt to first customer and the point of usage in production.	√		
	c	The Recall Program identifies steps, personnel and communications needed for an effective recall.	√		
	d	Mock recalls are performed for both component (ingredient) and finished goods. The ingredient is traced from receipt to finished good shipments. The finished good recall is traced back to all raw materials and product lot numbers.	√		
	e	Mock recalls less than 99% or greater than 100% equate to failure and lead to corrective action(s) and subsequent retests of the system.	√		
	f	ICL procedures specify that each individual package or shipping container has a clear and legible code date.	√		
	g	The process for traceability of reworked and/or repacked products are documented and implemented.	√		
	Comments:	See Recall Statement			

22		CONTROL OF NONCONFORMING PRODUCT	Y	N	N/A
	a	The facility has documented procedures for the segregation and control of non- conforming in-process and finished product.	√		
	b	Nonconforming product is segregated and controlled from inadvertent shipment (electronically or physically).	√		
	c	The facility has Hold procedures that define what circumstances lead to a "HOLD" decision and the scope/amount of product to be held.	√		
	Comments:	None			

23		CORRECTIVE/PREVENTATIVE ACTION	Y	N	N/A
	a	The facility has a documented approach or program for internal corrective and preventive actions. The CAPA could occur when problems arise or when processes are reviewed.	√		
	Comments:	None			

ICL Facility Assessment Checklist

24		CUSTOMER COMPLAINT AND SATISFACTION MANAGEMENT	Y	N	N/A
	a	Procedures are in place for documenting, investigating and responding to customer complaints.	√		
	b	Responses to complaints regarding a customer's product are directed to the customer in a timely manner.	√		
	Comments:	None			
25		**RISK MANAGEMENT & PRODUCT / FOOD SECURITY**	**Y**	**N**	**N/A**
	a	Each ICL manufacturing site has a written risk management program beyond product recalls that includes contingency plans for unexpected circumstances such as fire, interrupted power supply, natural disaster, explosions etc.	√		
	b	The manufacturing sites have written security plan measures that include procedures used to block access to the manufacturing facility for unauthorized individuals, and to protect the security of raw materials and finished goods.	√		
	c	Manufacturing food security training is conducted for all new hires with annual refresher training for all employees.	√		
	d	The manufacturing food security plan is periodically assessed, reviewed and updated.	√		
	e	Product segregation is adequate to prevent cross-contamination between raw and finished products.	√		
	Comments:	See Contingency Statement and Product Security Statement			
26		**MANUFACTURING & WAREHOUSE SECURITY**	**Y**	**N**	**N/A**
	a	Physical Security All buildings are constructed of materials, which resist unlawful entry and protect against outside intrusion. The physical security of the manufacturing facility include:	√		
		1 adequate locking devices for external and internal doors, windows, gates and fences	√		
		2 segregation and marking of international, domestic, high-value and dangerous goods cargo within the warehouse by a safe, or otherwise fenced-in area	√		
		3 adequate lighting provided inside and outside the facility to include parking areas	√		
		4 separate parking area for private vehicles separate from the shipping, loading dock and cargo areas	√		
		5 internal/external communications systems are in place to contact internal security personnel or local law enforcement police	√		
			Y	N	N/A
	b	Access Controls Unauthorized access to the shipping, loading dock and cargo areas is prohibited. ICL manufacturing facilities' access control program include:	√		
		1 the position identification of all employees, visitors and vendors	√		
		2 procedures for challenging unauthorized/unidentified persons	√		
			Y	N	N/A
	c	Procedural Security Measures for handling of incoming and outgoing goods include the protection against the introduction or exchange of any illegal material. ICL manufacturing facilities' security controls program include:	√		
		1 having a designated security officer or employee to supervise the introduction/removal of cargo	√		
		2 properly marked, weighted, counted and documented products	√		
		3 procedures for verifying seals on containers, trailers and railcars	√		
		4 procedures for detecting and reporting shortages and overages	√		
		5 procedures for tracing the timely movement of incoming and outgoing goods	√		
		6 procedures for storage of empty and full containers to prevent unauthorized access	√		
		7 procedures to notify Customs and other law enforcement agencies in cases where anomalies or illegal activities are detected or suspected by the company	√		
			Y	N	N/A
	d	Personnel Security Each ICL manufacturing facilities' personnel security control program include screening and interviewing of prospective employees.	√		
			Y	N	N/A
	e	Education and Training Awareness Each ICL manufacturing facilities' training program for employees include security awareness training for recognizing internal conspiracies, maintaining product integrity and determining and addressing unauthorized access and encouraging active employee participation in security controls.	√		
	Comments:	See Product Security Statement			

ICL Facility Assessment Checklist

27			PACKAGE LABELS AND PALLETIZATION	Y	N	N/A
	a		Package labels are verified before use on the manufacturing line as appropriate for the product being run.	√		
	b		Package labels include as a minimum:			
		1	Product Description	√		
		2	Kosher Symbol (where applicable)	√		
		3	Halal Symbol (where applicable)	√		
		4	Lot Code (sequential number generated in Product Management System (SAP), date of manufacturer (where applicable), date of expiration (where applicable), bag # (where applicable), time stamp (where applicable))	√		
		5	Net Weight	√		
		6	Safety and Hazardous communications	√		
		7	Customer Item Numbers (where applicable)	√		
	c		Pallet labels include as a minimum:			
		1	Product description and Item Number	√		
		2	Lot code	√		
		3	Date of manufacture	√		
		4	Amount of Product per pallet (lbs or kg)	√		
	d		Pallet label is positioned at the center of 2 opposite sides of the pallet	√		
	e		Pallets are no more than 48" high; including pallet and product.	√		
	f		Pallets are checked prior to use for faults such as off odors, cleanliness, protruding nails, broken wood and heat treatment seal.	√		
	g		Cardboard (slip sheets) or plastic dust covers and shrink wrapping are placed on all pallets so that the sides and tops of the product are completely covered.	√		
	h		Cardboard guards (slip sheets) cover the bottom layers of product to protect it from damage in transit (applies to all product packed in paper bags).	√		
	i		Product is palletized in such a way as to eliminate overhang beyond the pallet edges.	√		
	j		Only 1 product is packed on any 1 pallet. Must gain customer approval if more than one lot is on a pallet.	√		
	k		Products in a shipment are identified on Bills of Lading.	√		
	Comments:		None			

This documentation was developed to provide information when customers have questions regarding the Manufacturing Process and Food Safety & Product Quality Programs

It includes material identified under the following logos and may be used in lieu of completing a customer questionnaire.

ICL Food Specialties

ICL Performance Products LP

ICL Fosfatos y Aditivos México S.A. de C.V.

Name: Debbie Spradling

Signature: 

Title: Quality Documentation Coordinator

Date: 2/5/2015

ICL Facility Assessment Checklist

* All ICL Statements are available upon request. 1-855-425-7732, Option 2

ICL Questionnaire/Survey Attachments Include	
1	Allergen Statement – Phosphates, Phos Acid, Sulfates
2	Allergens List for Required Labeling
3	Animal Derivatives - Free Statement
4	Audit Report Policy
5	BSE / TSE - Free Statement
6	Clarification of FCC Requirements
7	Color Additives - Free Statement
8	FDA Facility Registration Warranty
9	Gluten Free Statement
10	GMO Statement
11	Good Manufacturing Practice Statement
12	HACCP Plan Overview Statement
13	Heavy Metals Testing in FCC Grade Products
14	Irradiation & Sterilization Statement
15	Lot Code Numbering Statement
16	Melamine and Cyanuric Acid Statement
17	ICL Food Specialties Press Release
18	MSG-Free Statement
19	Natural Statement
20	Pallet Treatment Statement
21	Pesticide – Free Statement
22	Preservative - Free Statement
23	Recall Procedure Statement
24	Residual Solvents Statement
25	Sewage Sludge (Biosolids) Statement
26	Shelf Life and Storage Conditions Statement
27	Vegan and Vegetarian Statement

Additional Product Information (Available Upon Request for Items a Customer Purchases)	
1	Product Data Sheet
2	Nutritional (per 100 grams)
3	MSDS / SDS
4	Product Label
5	COA / COC Example
6	Kosher Certificate (if applicable)
7	Halal Certificate (if applicable)
8	Certificate of Origin
9	Certificate of Insurance
10	Letter of Guarantee

Additional Production Location Information (Available Upon Request for Items a Customer Purchases)	
1	3rd Party Audit Certificate (full report or corrective actions are confidential and can be viewed when auditing a facility)
2	ISO Certificates

ICL Guiding Principles

ICL places high emphasis on its corporate and social responsibilities towards its employees and shareholders, customers and suppliers, the community and other stakeholders. As one of the world's leading chemical companies, ICL's awareness of corporate responsibility has evolved and deepened. It has led us to substantially increase our environmental, social and communal activities, and, most importantly, to internalize a commitment that guides us on a daily basis. This commitment comes from ICL's CEO, ICL's Chief Compliance Officer and senior management and is cascaded throughout our organization. Examples of ICL's commitment to corporate and social responsibility can be found in ICL's Corporate Responsibility Report on the ICL Group website at:

http://www.icl-group.com/sustainability/ResponsibilityReports/Pages/default.aspx

ICL Code of Ethics

In our daily business ICL employees are guided by our Code of Ethics. Our Code's core values include:

- **Fairness in business:** We will be honest and fair in all our business dealings.
- **Responsibility:** We will take full responsibility for our actions and performance.
- **Excellence and constant improvement:** We will always strive to be the best. We will encourage everyone who works with us to excel and deliver the highest quality. We are demanding of ourselves and others, and remain open to constructive criticism and suggestions for improvement.
- **Respect towards others:** We will treat everyone with courtesy and respect, valuing different opinions, and embracing diversity, caring about people's well-being, and respecting the balance of life outside work.
- **Commitment to safety:** We are committed to protecting the health and safety of all the people who play a part in our operations or live in the communities in which we operate.
- **Commitment to the environment:** We will conduct our business with respect and care for both the local and global environment.

The complete ICL Code of Ethics can be found on the ICL Group website at:

http://www.icl-group.com/careers/codeofethics/Pages/default.aspx

Along with our Code of Ethics and in light of the many differences in laws, regulations, standards and customs around the world, the following principles build the foundation on which ICL operates, the core values that underlie our daily business and the guiding principles for all ICL employees around the world.

Laws & Regulations

ICL policy is to comply unconditionally with all applicable laws, regulations, statutes, treaties and standards wherever we operate throughout the world.

Human & Employment Rights

ICL respects and observes internationally recognized human rights and complies with all relevant labor and employment laws for the areas in which it operates. ICL adheres to the following principles:

- **Freedom of association**
  ICL employees are free to form, join and/or participate in workers' organizations and exercise their right to engage in collective bargaining. ICL maintains an open channel of communication with its employees.
- **Forced or compulsory labor**
  ICL does not use forced, prison or indenture labor in any form. ICL prohibits the use of threats of or actual physical or psychological violence or measures of economic pressure to force employees to perform labor or maintain employment.

- **Child labor**
  ICL complies with the minimum age of employment required by the laws of the countries in which we do business.

- **Discrimination and Harassment**
  ICL employees are treated with respect and dignity. ICL has no tolerance for discrimination or harassment in any form, against any person based on, including but not limited to, their religion, race, ethnicity, nationality, gender, sexual orientation, age or disability. ICL supports the provision of equal opportunities to all its employees and candidates for employment.

- **Salaries and working hours**
  ICL follows, at a minimum, country requirements regarding minimum wage, fringe benefits, working hours, overtime, sick leave and vacation. ICL pays its employees fair wages and respects their need for life outside of work.

- **Legal Employment**
  ICL employs only those with valid documents proving their right to work in the relevant countries in which ICL operates.

- **Health and Safety**
  ICL complies strictly with occupational safety and health standards prescribed by local laws as well as international and local standards. ICL invests heavily in employee education and occupational safety and health measures not only to be in strict compliance with industry standards and local safety rules, but more importantly to try to prevent exposure of its employees and the surrounding communities to dangerous products and processes at all its locations.

Ecological and Environmental Protection

ICL is fully committed to environmental and business sustainability including, but not limited to, the responsible usage and sustainable management of natural resources, reduction of environmental impact and waste and observance of responsible care principles throughout the life cycle of its products (by adopting the Responsible Care Global Charter). Moreover, we strive, to the extent possible and appropriate, including our use of best available technology (BAT) when technologically and economically feasible. Where no relevant legislation has been enacted, we strive to voluntarily adopt the most widely accepted standards for our industry.

Business Conduct

ICL conducts business with the highest of integrity standards. ICL does not resort to illegal methods to obtain and retain customers, suppliers, business, permits, licenses or concessions. ICL will not tolerate or participate in bribery, corruption, fraud or any other kind of unethical business behavior.

- **Financial Integrity**
  Our financial records are maintained according to applicable local and international laws, standards and generally accepted accounting principles.

- **Anti-Bribery & Anti-Corruption**
  ICL respects its relationships with governmental and official authorities, and complies with all the laws, regulations and standards applicable to its operations. ICL does not tolerate any kind of improper influence on decision makers, including but not limited to offers of bribery or any other illegal activity, either directly or indirectly. ICL uses internal guidance and contractual requirements to ensure that its employees and agents do not engage in bribery or corruption in any form.

- **Antitrust & Competition**
  ICL is dedicated to ethical, fair and vigorous competition. ICL follows antitrust and competition rules and does not accept improper conduct or agreements with customers, suppliers, competitors or others. Amongst others price fixing, market allocation, bid rigging and refusal to deal are absolutely prohibited.

- **Compliance Training**
  ICL trains its employees regularly on legal and regulatory requirements and ICL policies including the Code of Ethics and the employee's responsibility to act in an ethical manner.

- **Reporting**
  To address fraud, abuse, and misconduct in the workplace ICL provides a formal and confidential reporting system for its employees.

- **Trade**
  To prevent the financing of terrorism and ensure compliance with global trade laws, ICL has procedures in place to review all of the Company's potential transactions and the identity of its potential customers against the sanctions lists of the US, Europe, the UN and others. ICL also has procedures in place to investigate "red flags" that may arise during its operations.

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-800-244-6169
www.icl-pp.com

ICL SECURE POLICY ON SEALING PRODUCT TRANSPORTATION CONTAINERS

General Requirements:

All product transportation containers (except for less than truck load (LTL) loads containing ICL products shipped to customers, warehouses and toll manufacturing locations will use tamper evident seals, installed properly so that access points cannot be opened and such that it is evident that tampering has occurred. The seal numbers will be recorded on the bill of lading (BOL) so the customers, warehouses and tollers can verify/validate the product integrity.

Following are the typical minimum requirements for different vehicle and container types, with the intent of the requirement being the need to seal any opening into the container that can provide direct access to our products.

Bulk trucks and bulk railcars with seals already attached will be inspected for integrity and documented along with the seals installed by ICL. ICL Policy is that all empty dedicated bulk vehicles will be moved with seals on access points when shipping intra-company. ICL will require carriers to place seals on all dedicated bulk vehicles when they return empty from customers. For dedicated bulk railcars, ICL will work with customers, both internal and external, to have them use seals on empty cars that are returned. All seal numbers will be recorded on the return BOL / paperwork and faxed to the receiving facility.

If seals are not on all access points when a dedicated vehicle is returned, the vehicle will be inspected in accordance with standard procedures and if appropriate, failure to seal will be communicated back to the responsible party.

When dedicated vehicles are washed, they must be resealed and seal numbers must be noted on the wash slip.

The following are examples of typical sealing requirements for different vehicle and container types if the access points are designed for a seal:

Packaged Trailers and Containers
All penetrations are to be sealed. This includes but is not limited to:

a. The latch on rear door must be sealed and trailer/container integrity confirmed prior to loading;
b. Inbounds must have the integrity of the trailer/container inspected as well as verification of the seal # prior to unloading; and
c. For heated or refrigerated trailers, if there is a control panel that is accessible from the outside of the trailer it should be sealed and documented as well.

Dry Bulk Railcar
All penetrations are to be sealed. This includes but is not limited to:

a. Each dome hatch on top of the railcar;
b. Each slide gate valve on the bottom; and
c. The cap on the bottom of a pressure differential (PD) car.

Liquid Bulk Railcar

All penetrations are to be sealed. This includes but is not limited to:

a. The man-way covers or fill hole;
b. The liquid line or dome covering;
c. The air valve or dome covering;
d. Bottom unloading valves, if any; and
e. Wash out and drain valves, if any.

Dry Bulk Truck

All penetrations are to be sealed. This includes but is not limited to:

a. All loading domes;
b. Discharge cap; and
c. Hose ends shall be capped, sealed and secured when hoses are not in use.

Liquid Bulk Truck

All penetrations are to be sealed. This includes but is not limited to:

a. Top loading dome;
b. Bottom discharge cap;
c. Flange on the internal valve; and
d. Hose ends shall be capped, sealed and secured when hoses are not in use.

Liquid Isotainers and Containers

All penetrations are to be sealed. This includes but is not limited to:

a. The man-way covers or fill hole;
b. The liquid line or dome covering, if so equipped;
c. The air valve or dome covering, if so equipped;
d. Bottom unloading valves or caps, if any;
e. Hose ends shall be capped, sealed and secured when hoses are not in use, if so equipped;
f. Hoses used for unloading will be washed and rinsed prior to use; and
g. Re-useable isotainers/containers will be sealed and tagged after use for return.

Seal Specifications and Documentation:

The sealing of trailers, to include continuous seal integrity, is a crucial element of a secure supply chain. Using Customs-Trade Partnership Against Terrorism (C-TPAT) guidelines, seals for all ICL NA railcar, bulk truck, and package truck shipments must meet or exceed the current ISO 17712:2010 standards for high security seals.

In order to meet this standard, ICL NA has chosen to use the 1/8" E Z Loc high security cable seals for its shipments.

For more information regarding C-TPAT and seal specifications please see the attached document.

For internal movements, i.e. plant shuttle movements to the outside warehouse, or plant shuttle movements to a toller, each plant will decide on the type of seal used for this particular internal application. All of the seal numbers shall be recorded on the BOL.

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January 6, 2015

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

ICL Performance Products LP

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-perfproductslp.com

ICL Fosfatos y Aditivos México S.A. de C.V.

ICL Performance Products
Total Quality Statement

We, the employees of ICL Performance Products LP and ICL Fosfatos y Aditivos México S.A. de C.V, are committed to being the best manufacturer and/or marketer of phosphates, phosphoric acid, sulfates, aluminates, adipic acid, and sea salt products.

In fulfillment of the commitment to our corporate charter, we will strive to deliver results for the mutual benefit of our customers, our communities, and ourselves.

To meet this commitment we will:

- Understand and satisfy current and future agreed upon customer needs and expectations.
- Satisfy all regulatory requirements.
- Provide an empowering and rewarding work environment for all employees.
- Continue our industry leadership in operational excellence.

To achieve this we will:

- Maintain ISO Certification of our Quality Systems as a foundation for the management and improvement of our manufacturing processes.
- Adhere to food safety legislation, and maintain appropriate certification according to the Global Food Safety Initiative (GFSI).
- Continually monitor our performance against identified goals in the areas related to Environmental, Safety, and Health.
- Provide training to enable our employees to effectively contribute to continuous improvement in meeting the requirements of their job and as a team member.
- Establish and measure ourselves against annual key performance indicators.

James R. Moffatt
President

February, 2012

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-pp.com

LOT CODE NUMBERING EXPLANATION – ICL NORTH AMERICA

For tracking and identification purposes, ICL Performance Products uses the SAP system at its U.S. and Mexico 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 Ladenburg, Germany facility. 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 4 digits represent the plant of manufacture, while a computer-based counter at each plant sequentially assigns a number to generate the last 5 digits.

For bulk material, the lot numbers have 10 digits. Again, 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 4-digit 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 contact ICL Performance Products Marketing Technical Service at 800-244-6169 if you have additional questions about our lot code numbering system.

Plant of Manufacture	4-Digit Code
Carondelet, Missouri	2210
Lawrence, Kansas	2230
Monterrey, Mexico	2800

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

June 6, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

MELAMINE AND CYANURIC ACID STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture and/or market high quality phosphates, phosphoric acid, sulfates, sea salts, and adipic acid products, which are produced according to current Good Manufacturing Practices (GMP) for manufacturing, packing, and holding human food (Title 21, Code of Federal Regulations, Part 110). These food ingredients do not contain protein or protein-like components.

Melamine is a deleterious compound that has been found in the past in a selected portion of the food supply as an intentional contaminant to boost the appearance of the protein level in foods and food ingredients. Cyanuric acid is a structural analogue of melamine. There would be no reason for contaminants such as melamine or cyanuric acid to be present in the above listed food ingredients or in the raw materials used to produce these food ingredients.

Therefore, although we do not test for melamine or cyanuric acid in our food grade ingredients, we can guarantee that they are not present in these products, based on the inorganic nature of our products and on our carefully controlled manufacturing and testing processes.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

September 23, 2014

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

ICL Performance Products LP

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-perfproductslp.com

ICL Fosfatos y Aditivos México S.A. de C.V.

Metals Residue (EMEA) Statement

ICL Performance Products LP and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. Four of these products are also manufactured according to pharmaceutical ingredient specifications in the U.S. and/or Europe, and are sold as excipients or as non-active ingredients of pharmaceutical formulations.

According to the European Medicines Agency (EMEA) Guideline on the Specification Limits for Residues of Metal Catalysts or Metal Reagents (Doc. Ref. EMEA/CHMP/SWP/4446/2000), there are fourteen metals of interest. **None of these metals are used as catalysts or reagents in the production of ICL pharmaceutical grade products.** Therefore, we do not regularly test for these metals in our products.

It should be noted, however, that it is possible that some of the metals may be found in the materials of construction of the equipment used to produce the raw materials we purchase for our processes, or may be present naturally in the mineral sources of those raw materials. Therefore, it is possible that some of these metals may be present in our products at low levels. If additional details are needed in order to use our products in certain pharmaceutical formulations, please contact your ICL account representative

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients

August 8, 2012

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-pp.com

MICROBIOLOGICAL TESTING STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture 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 our products is viewed as negligible, we have taken additional steps to implement a basic microbiological testing program at each of our manufacturing sites. 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.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

December 11, 2012

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

NANOTECHNOLOGY STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture and/or market high quality phosphates, phosphoric acid, sulfates, adipic acid, and sea salt products for use in food, industrial, and pharmaceutical applications. Nanotechnology is not used in the processing of any of our products, and materials considered to be nanomaterials are not intentionally added as components in any of our products.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

July 9, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

"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 our products to be synthetic substances, since they are not present in nature in their current form of phosphoric acid, phosphates or sulfates.

ICL products are all 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.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

March 7, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

NOTIFICATION OF CHANGE STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) agrees to notify those customers who request notification of changes to our process, including, but not limited to, significant changes in raw materials, specifications, or manufacturing location which may affect product quality, prior to implementation.

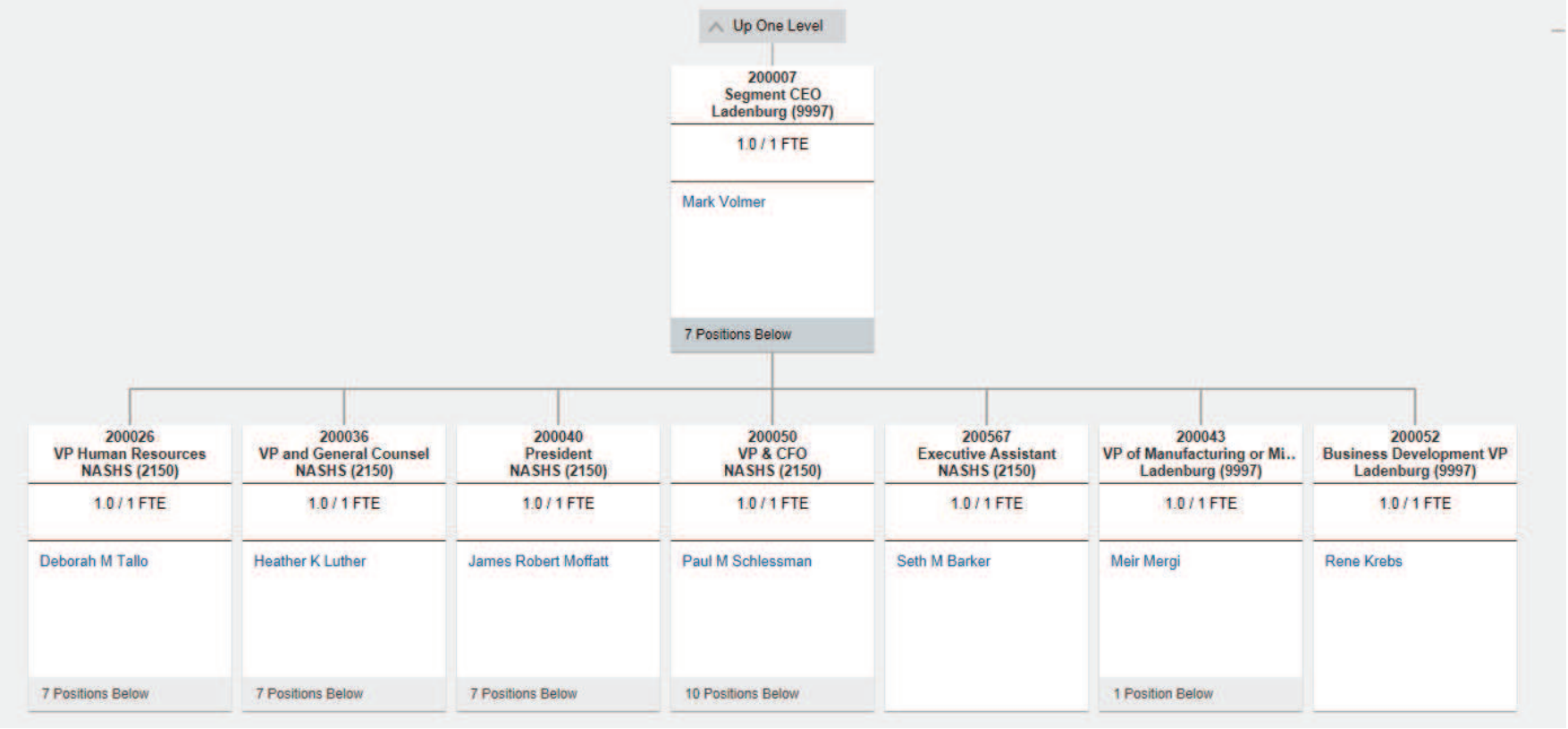
All requests from customers (and distributors) for notification must be in writing and submitted directly to the ICL Customer Specification Review Process. Customers purchasing ICL products from distributors may make arrangements for notification of change either directly with their distributors, or through the ICL Customer Specification Review Process. The ICL notification to customers will be in writing, unless otherwise agreed to with the customer.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

February 14, 2014

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


Up One Level
200007
Segment CEO
Ladenburg (9997)
1.0 / 1 FTE
Mark Volmer
7 Positions Below
200026
VP Human Resources
NASHS (2150)
1.0 / 1 FTE
Deborah M Tallo
7 Positions Below
200036
VP and General Counsel
NASHS (2150)
1.0 / 1 FTE
Heather K Luther
7 Positions Below
200040
President
NASHS (2150)
1.0 / 1 FTE
James Robert Moffatt
7 Positions Below
200050
VP & CFO
NASHS (2150)
1.0 / 1 FTE
Paul M Schlessman
10 Positions Below
200567
Executive Assistant
NASHS (2150)
1.0 / 1 FTE
Seth M Barker
200043
VP of Manufacturing or Mi..
Ladenburg (9997)
1.0 / 1 FTE
Meir Mergi
1 Position Below
200052
Business Development VP
Ladenburg (9997)
1.0 / 1 FTE
Rene Krebs

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

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.

The general website for this program is: http://www.ams.usda.gov/AMSv1.0/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: http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title07/7cfr205_main_02.tpl

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 is the important section for phosphates. It is for "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 are:

- 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 – for use only as a leavening agent
- Sodium phosphates – for use only in dairy foods - *This is interpreted by industry to include only ortho-sodium phosphates (MSP, DSP, TSP), based on the definition given in 21 CFR 182 for sodium phosphates.*
- Tetrasodium pyrophosphate – for use only in meat analog products
- 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 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.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

September 20, 2013

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

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

August 31, 2016

PACKAGING MATERIALS FOR FOOD GRADE PRODUCTS

ICL Food Specialties (a division of ICL Performance Products LP) manufactures high quality food grade products including phosphates, phosphate blends, phosphoric acid, sulfates, adipic acid, as well as natural salts and products, which are intended for use as food ingredients. The packaging materials used with these products are in compliance with regulations for packaging of food grade products in the US, the EU, Mexico, and many other countries.

Our suppliers of our food grade packaging confirm that this packaging also meets requirements for the level of specific heavy metals in these packaging materials, as set forth in the following legislation:

- Toxics in Packaging Clearinghouse (TPCH)
- EU Directive 94/62/EC (and amendments) on Packaging and Packaging Waste

These regulations and requirements are intended to prevent or reduce the impact of packaging waste on the environment. The requirements specify that the heavy metals content (the total from Lead, Cadmium, Mercury, and Hexavalent Chromium) is less than 100 ppm in the packaging materials. We confirm that the packaging materials used by ICL comply with this total heavy metals requirement.

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

ICL Performance Products LP

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-perfproductslp.com

ICL Fosfatos y Aditivos México S.A. de C.V.

PALLET TREATMENT STATEMENT

ICL Performance Products LP and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture high quality phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. The pallets used for shipping and distributing these products have been heat treated only. The pallets that are used for the distribution of our finished products do not undergo any type of chemical treatment.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients

September 16, 2012

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-pp.com

PESTICIDE - FREE STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials.

Strict pest control policies are maintained at our manufacturing facilities. 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 salt, phosphoric acid, and sulfate salt products are free from contamination with pesticides and/or pesticide residue.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

January 17, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

PHARMACEUTICAL GRADE PRODUCTS

ICL Food Specialties (a division of ICL Performance Products) manufactures high quality phosphates, phosphoric acid, and other substances for use as ingredients in the food industry. A few of these substances are also manufactured as pharmaceutical grade products, and are manufactured and tested according to the GMP Guidelines for Bulk Excipients (IPEC), and also meet all current USP/NF compendial requirements. In addition, three of these ICL products have been certified by the EDQM for use in European pharmaceutical applications. Currently, all of the pharmaceutical grade products made by ICL Food Specialties are inactive components for pharmaceutical formulations, providing functionalities to these formulations such as inert excipients and as pH adjusting agents.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

January 17, 2014

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

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Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

PHTHALATE – FREE STATEMENT

ICL Food Specialties (a division of Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture high quality food grade phosphates, phosphoric acid, sulfates, and specialty blends of food ingredients. Our food grade products are manufactured in compliance with the regulations in 21 CFR 110 for "Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food".

There are no organic solvents or other organic compounds used in the manufacturing, processing, or packaging procedures for these products. In addition, there are no phthalate-based substances used in the production or packaging materials that come into contact with our food grade products. This includes, but is not limited to, phthalate compounds such as: BBP, DBP, DEHP, DIDP, DINP, and DnHP.

Therefore, we are able to guarantee the absence of phthalates in our food grade products.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

August 12, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

PRESERVATIVE – FREE STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture high quality food grade phosphates, phosphate blends, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. There are no preservatives used in the manufacturing of these products, including antimicrobials and antioxidants. Therefore, the absence of preservatives, such as BHA (butylated hydroxyanisole), BHT (butylated hydroxytoluene), benzoates, parabens, sorbates, nitrites, or sulfites, can be guaranteed.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

April 17, 2013

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

For more information:

Allison Stein
(314) 746-1973
Mobile: (314) 917-1621
allison.stein@osbornbarr.com
O&B

Beth Warren
(314) 983-7535
Mobile: (636) 236-4158
beth.warren@icl-pplp.com
ICL Food Specialties

ICL Performance Products Launches New Division – ICL Food Specialties

ST. LOUIS, October 9, 2012 — Leading food ingredient suppliers ICL Performance Products LP and BK Giulini, with previously separate sales and marketing groups within ICL PP in North America, have combined to form the new North American food division ICL Food Specialties.

"By uniting the forces of these two knowledgeable groups within our organization, ICL Performance Products will focus and strengthen its activities in the North American food and beverage industry," said Dr. Wolfgang Schneider, Global Lead, Food, ICL Food Specialties. "The alignment of technical expertise follows ICL's Global strategy to be a preferred partner for the food industry."

The new division will share with customers a legacy of experience across all applications within the food industry. It also will provide a portfolio of products that offer customers new ingredients and technologies to solve challenging product development opportunities.

"ICL Food Specialties provides customers with a unique understanding of ingredient interactions to offer options that improve the consistency of product quality while providing more tolerance for common processing variances," said Beth Warren, Director, ICL Food Specialties. "Combining these two experienced teams will allow ICL to provide customers with resources and services that help tailor their formulations to optimize the sensory experience," says Warren.

ICL Food Specialties will focus on trend inspired food and beverage applications as well as the continued development of new technology, such as Licresse™, launched this summer under ICL Performance Products. It also will provide innovative and functional prototypes for customers through unique application development tools available at the technology center in Webster Groves, Mo.

To learn more about ICL Food Specialties, visit www.icl-pp.com.

ICL Food Specialties

ICL Performance Products (ICL-PP), one of ICL's core operating segments, produces and markets food-grade phosphoric acid, phosphate salts, specialty phosphates products and services for detergents, water treatment, construction, and paper, as well as food additives and hygiene products. ICL-PP's production facilities are located in Europe, North and South America, Israel, Australia and China. For more information, call toll free 800.244.6169 or visit www.icl-pp.com.

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Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

PRODUCT SECURITY STATEMENT

At ICL Food Specialties (a division of ICL Performance Products), safety is a priority for our facilities, our employees, and our products. As a manufacturer of ingredients for the food, pharmaceutical, and other industries, we want to assure our customers that the safety and integrity of all of our products is of utmost importance to us as a company.

In June 2002, the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 was signed into law in the United States. In addition, the Food Safety Modernization Act (FSMA) was signed into law in 2011. As the various parts of these U.S. laws have gone into effect, our company has complied with the requirements of the law. We have registered the applicable sites in our company with the U.S. Food & Drug Administration as Food Facilities, have complied with the Prior Notice for Imports when applicable, and have proper recordkeeping in place at our food-grade manufacturing facilities to meet the requirements. We intend to continue to meet all U.S. food safety laws as they are finalized and go into effect.

We will continue to follow our Good Manufacturing Practices (GMP) documentation and Responsible Care principles and management practices to produce, package, store, and transport phosphates, phosphoric acid, sulfates, and other products and product blends, so that they are safe and reliable for their intended applications. In addition, we have reviewed and upgraded the site security and emergency plans for our internal company locations, and also have implemented a program to ensure that we have proper seals and documentation on all products transported to and from our sites.

The safety and integrity of ICL products, from our door to yours, is extremely important to us. We want you, our customers, to know that we will continue to take appropriate measures to ensure this safety.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

April 20, 2015

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

ICL Performance Products LP

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
(800) 244-6169, Option 1
www.icl-perfproductslp.com

ICL Fosfatos y Aditivos México S.A. de C.V.

RECOMMENDED PRODUCT STORAGE CONDITIONS

ICL Performance Products LP and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture high quality food and technical grade phosphates, phosphoric acid, and sulfates. The recommended storage conditions for our products and product blends are for these materials to be kept at ambient temperatures, at low to moderate humidity, in the original packaging, and also to be protected from any wet environmental elements (e.g., rain, snow, ice, or standing water). Our internal shelf life studies are conducted under these conditions, so it is recommended that these products are also stored under similar conditions to achieve the expected shelf life. Due to the broad range of climates to which our products are distributed, we do not put specific limits on the temperature or humidity ranges. In addition, we also recommend that all food grade products are stored according to the U.S. regulations in 21 CFR 110, for "Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food."

Note that materials stacked during long term storage may develop some pressure compaction and may require screening or milling before use. This is particularly true of powdered products.

ICL Performance Products does not guarantee the performance of our products indefinitely, since we cannot ensure how the materials are stored once they leave our control. However, if the recommended storage conditions are maintained, performance should be assured for the shelf life indicated in that statement, and in the case of certain products, for a much longer period of time. For some leavening acids, testing to ensure performance is recommended after 12 months. ICL Performance Products will not recertify expired product for shelf life extension.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients

January 11, 2012

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

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 delistings as determined by that state agency.

While none of the phosphates (or their raw materials) produced by ICL Performance Products (including ICL Food Specialties and ICL Fosfatos y Aditivos Mexico S.A. de C.V.) 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.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

March 16, 2015

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

RECALL PROCEDURE STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture and/or market high quality phosphates, phosphoric acid, sulfates, adipic acid, and sea salt products that meet appropriate food and/or pharmaceutical grade specifications.

Our company has a documented procedure for initiating a product correction (including product recalls), which is shared within our organization to ensure uniform and consistent application of practices and procedures throughout the company. This procedure covers any ingredients or additives for foods, bulk pharmaceuticals, cosmetics, or feeds, which are intended for human or animal use. The guidelines supplied by the U.S. Food & Drug Administration were used in developing our internal documents and procedures.

Each of the ICL manufacturing locations of food and pharmaceutical grade products in the U.S. and Mexico maintains a current written contingency plan for implementing a product recall if needed for products they are responsible for at their facility or at the warehouse(s) in which they are stored, and also has a designated plant representative responsible for coordinating these activities. These plans are based on the overall company product correction procedures.

The ICL-North America Director of Technical Service and Applications Research has the overall responsibility for coordinating the specific plan of action for any product correction activities, including all classes of product recalls. ICL considers the specific information regarding product recall procedures to be proprietary, and maintains it as an internal controlled document.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

March 11, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

RESIDUAL SOLVENTS STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture 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.*

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

January 30, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

SEWAGE SLUDGE (BIOSOLIDS) STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture and/or market high quality phosphates, phosphoric acid, sulfates, and adipic acid products that meet appropriate food grade specifications and can be used as food ingredients.

Sewage sludge (also called biosolids) is not utilized either as a source for raw materials or in any part of the manufacturing processes for our products.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

March 12, 2013

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

SOURCE OF MANUFACTURING INGREDIENTS

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture and/or market high quality phosphates, phosphoric acid, sulfates, and adipic acid products, as well as blends of these and other food ingredients, that meet appropriate food grade specifications and can be used as food ingredients.

These products are manufactured using only high quality raw materials and processing aids (when required). Prior to use of any raw material or ingredient, proper documentation is required to demonstrate that all of our quality and purity specifications are met. The vast majority of all raw materials for the production of these food ingredients are sourced from intra-company facilities or from regional suppliers. Key raw material components are from the United States, Germany, and Israel.

All of our raw materials and final food additive products are analyzed according to internal product specifications, which meet the applicable standards and criteria for food additives as defined by the specified reference compendia (e.g., Food Chemicals Codex-FCC, EU Directives, or as stated otherwise). ICL has manufacturing sites for these food grade products in various countries, including the United States, Mexico, Brazil, Germany, and Israel. All sites use Good Manufacturing Practices to produce high quality food ingredients for our customers.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

August 12, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

STERILIZATION – IRRADIATION STATEMENT

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture high quality food grade phosphates, phosphoric acid, and sulfates, which are high purity inorganic products manufactured from refined mineral raw materials. There have not been any sterilization procedures performed on these products, including, but not limited to: irradiation, steaming, or chemical processing for the purpose of sterilization.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

March 12, 2013

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

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373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

STPP Product Labeling Information

Sodium Tripolyphosphate (STPP), FCC Grade, sold by ICL complies with FDA requirements for food grade, and meets or surpasses all quality specifications in the Food Chemicals Codex (FCC). Our STPP is sold individually as Nutrifos® 088 and also in blends with other phosphates under the Nutrifos® and other company tradenames.

Due to the manufacturing processes used to produce STPP, the similar substance of Tetrasodium Pyrophosphate (TSPP) is likely to be present in our STPP at a typical low level of about 3 - 5%. This low level of TSPP is standard in the industry, and is covered under the current FCC specifications.

Since TSPP itself meets the OSHA criteria for alkalinity (high pH), in the past we have chosen to disclose its presence on our Nutrifos product labels. This information was not required for food grade product labeling, however, since it is normally found at these low levels in STPP. We have recently been advised that the listing of TSPP in STPP products is not necessary, and may cause confusion. Therefore, the updated product labels and blend component lists of our Nutrifos and other products containing STPP will not include TSPP unless the TSPP is physically added as a blend component to the product.

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

February 6, 2014

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

Webster Groves Technical Center
373 Marshall Avenue
Webster Groves, MO 63119
1-855-ICL-SPEC (1-855-425-7732)
www.icl-pp.com

***Trans* Fat and Partially Hydrogenated Oil (PHO) Statement**

ICL Food Specialties (a division of ICL Performance Products LP) and ICL Fosfatos y Aditivos México S.A. de C.V. manufacture food grade phosphates, phosphoric acid, sulfates, and other food ingredient blends, which include high purity inorganic products manufactured from refined mineral raw materials as well as blends with substances such as food gums, sugars, hydrocolloids, and organic acids.

The U.S. Food & Drug Administration (FDA) has recently (Nov. 7, 2013 – Federal Register) made a preliminary determination that partially hydrogenated oils (PHOs) are no longer "generally recognized as safe" for use in foods, since they are the major dietary source of artificial *trans* fat in processed food. This statement confirms that there are no fats or oils added to any of ICL's food grade products or product blends, so we can therefore guarantee the absence of *trans* fats and partially hydrogenated oils (PHOs) in our products.

Lori L. Klopf

Lori L. Klopf, Ph.D.
Regulatory Affairs Manager
Food & Pharmaceutical Ingredients
ICL Food Specialties (a division of ICL Performance Products LP)

November 18, 2013

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