

## Food Fraud Prevention: Economically Motivated Adulteration

National Sugar Marketing (NSM) and its Member Partners have conducted a food fraud vulnerability assessment in association with our Hazard Analysis and Critical Control Point (HACCP) programs per 21 CFR 117.130(b)(2)(iii). Also, the quality impacts of food fraud were considered and documented in a vulnerability assessment for each product category marketed by NSM. Consideration included historical evidence, substitution, mislabeling, dilution, counterfeiting, supply chain access, testing, and nature of raw materials.

Sugar products are low-risk commodities, and food fraud is not likely to occur. Based on the vulnerability assessment, there were no identified vulnerabilities that would impact food safety or regulatory compliance. Thus, a mitigation plan is not required. Minor vulnerabilities with a low likelihood of occurrence have been identified and would affect quality attributes only. Quality vulnerabilities are controlled via pre-established company policies, procedures, and testing and include measures to prevent:

**Substitution:** There have been two minor types of substitution identified. First, due to occasional price differences between granulated sugar sourced from cane and granulated sugar sourced from beets, there is the vulnerability of potential substitution. Facilities that handle both products in bulk form ensure that beet sugar is not substituted for cane sugar and vice versa in cases where customers mandated preserved identity. Second, Amalgamated Sugar switched corn starch to Non-GMO Identity Preserved to ensure compliance with 7 CFR 66. The Nampa facility sources this starch from approved suppliers and ensure traceability by maintaining current documentation of the IP status of the starch.

Our products and associated vulnerabilities are reassessed annually to ensure information is accurate and current. As new information emerges, vulnerabilities may change and further actions will be taken.

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