

## Recall Program Statement

National Sugar Marketing (“NSM”) and its Partners: D&S Ingredient Transfer Company (“D&S”), Southern Minnesota Beet Sugar Cooperative (“SMBSC”), Spreckels Sugar Company, and Amalgamated Sugar have jointly implemented a comprehensive recall program (“Program”). The Program also extends to contracted manufacturers and warehousing, and it is covered under contractual agreements. The Program was developed using FDA Regulatory Procedures Manual guidance and demonstrates compliance with the requirements established by our certification standards, customer expectations, and Federal Regulations outlined in 21 C.F.R. § 117.139.

The Program includes involvement from NSM, its Partners, and Contractors. The Program consists of corporate policy, documented procedure, traceability programs, consignee notification, health hazard assessments, recall classification, FDA notification, media notification, certification body notification, documented recall strategy, effectiveness check measures, and corrective action procedures.

To ensure that the Program functions as intended and to meet continuous improvement objectives, NSM, its Partners, and Contractors participate in annual verification activities that include a recall test. NSM’s success criteria for recall testing include a minimum of 98% identification and trace within four hours and recall documentation assemblage, including consignee list within 24 hours. Unsuccessful recall tests are subject to corrective action procedures. The Program is additionally reviewed annually as part of NSM’s annual system review.

NSM Quality Assurance Team  
quality@natsugar.com  
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