



## SweetRight® Honey Powder

Product Code 115801

## Technical Information

### Product Description

SweetRight® Honey Powder is made from pure honey converted to a free-flowing powder through a special drying process. The color is similar to that of honey. It is used widely in variety breads and other baking applications as a convenient replacement for liquid honey.

### Specification

<u>Proximate Analytical Data</u>	<u>Limit</u>	<u>Method</u>
Honey Solids, Dry Basis, % Target	29	
Honey & Other Sweetener Solids, Dry Basis, %	65.7	
*Moisture, % Max	3.5	ANP.060.101.4
Protein (Nx5.7), % Max	1.7	FCC
Ash, % Max	0.9	FCC
*Granulation		
On 25 USBS, % Max	3	ANP.060.741.2
On 60 USBS, %	35-70	ANP.060.741.2
On 100 USBS, %	15-40	ANP.060.741.2
<u>Microbiological</u>		
*Standard Plate Count, g Max.	5000	FDA/BAM
*Yeast & Mold, g Max.	100	FDA/BAM
*Coliforms, g Max.	50	FDA/BAM
*Salmonella	Non-detect.	FDA/BAM
*E.coli	Non-detect.	FDA/BAM
*Product Guarantee		
*reported on COA		

### Other Information

#### **Ingredient Statement**

Honey, high fructose corn syrup, wheat starch, corn syrup, soy flour, calcium stearate and soy lecithin

#### **Regulatory Information**

Country of Origin: United States  
GRAS Affirmation

#### **Social Suitability**

Kosher Pareve (OU certified)  
Halal certified (IFANCA)  
Vegetarian compatible

#### **Available Pack Size**

50 lb. corrugated carton with polyethylene inner bag. Ten cartons per layer, four layers per pallet (2,000 lb. net)

### Storage and Shelf Life

Shelf life is guaranteed 18 months under clean, dry, ambient warehouse conditions. Recommend stacking no more than two pallets high.

### Lot Coding

Lot code: **YYMMDD**

**YY** 2-digit year code  
**MM** 2-digit month code  
**DD** 2-digit day code

Example: 210101

This lot is the first batch packed on January 1, 2021.

### Manufacturing Address

ADM Stanley, 105 McKnight Street, Stanley, WI 54768 USA



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## Nutrition Information

Nutrient	/100g	Other Vitamin & Mineral	Essential /100g
*Total Calories	389 kcal	Vitamin A (RAE)	<30 mcg
Total Fat	1 g	Vitamin C	<0.5 mg
Saturated Fat	0 g	Thiamine	<0.01 mg
Trans Fat	< 0.02 g	Niacin	<0.1 mg
Polyunsaturated Fat	0 g	Vitamin D	
Monounsaturated Fat	0 g	Vitamin E	
Cholesterol	0 g	Vitamin B6	
*Total Carbohydrates	94.2 g	Vitamin B12, µg	
Total Sugars	68.2 g	Folic Acid, µg	
Sugar Alcohols	0 g	Biotin	
Added Sugars	68.2 g	Vitamin K	
Dietary Fiber	0.5 g	Pantothenic Acid	
Soluble Fiber	0 g	Riboflavin	0.12 mg
Insoluble Fiber	0.5 g	Phosphorus	57 mg
Protein	1.5 g	Magnesium	13.6 ppm
Calcium	72.5 g	Zinc	0.8 mg
Iron	1.8 mg	Copper	
Sodium	31.3 mg	Manganese	
Potassium	76.3 mg	Selenium	
*calculated values		Chromium	
		Molybdenum	
		Iodine	
		Fluoride	
		Sulfites	
		Chloride	

### Packaging

50 lb. box: 10x10x16 inch corrugated cardboard box with separate blue 4 mil polyethylene bag closed with a plastic tie.

Packaging is compliant with:

- (EU) No. 10/2011 on Plastic Materials and Articles Intended to Come into Contact with Food
  - Including all amendments to date.
- (EC) Regulation No. 1935/2004 on Materials Intended to Come into Contact with Food
  - Including all amendments to date.
- FDA 21 CFR 177.1520 pertaining to plastic films used in packing with food contact



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## Allergen Information

### Allergen Information

The following table lists all the major food allergens recognized under the US Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) and other regional definition. A thorough cleaning is completed and verified before switching to products with different allergens.

	US	CAN	EU	AUS NZ	JPN	Present in Final Product	Present in Production Line	Present in Production Facility	Cross Contamination Possible
Celery and celeriac		●	●			No	No	No	No
Cereals with Gluten, such as wheat, rye, barley, oats, spelt, buckwheat and triticale	●	●	●	●	●	Yes	Yes	Yes	Yes
Crustacean shellfish	●	●	●	●	●	No	No	No	No
Egg and egg products	●	●	●	●	●	No	No	No	No
Fish and fish products	●	●	●	●	●	No	No	No	No
Fruits and fruit products such as orange, kiwi, banana, peach, apple, mango, tomato					●	No	No	No	No
Gelatin and gelatin products					●	No	No	No	No
Latex and latex products						No	No	No	No
Lupin and lupin products			●	●		No	No	No	No
Meat and meat products such as beef, chicken, pork					●	No	No	No	No
Milk and dairy	●	●	●	●	●	No	Yes	Yes	Yes
Molluscan Shellfish	●	●	●	●	●	No	No	No	No
Mustard and mustard products		●	●			No	No	No	No
Matsutake mushrooms					●	No	No	No	No
Peanut and Peanut products	●	●	●	●	●	No	No	No	No
Sesame and sesame products	●	●	●	●		No	No	No	No
Soy or Soy products	●	●	●	●	●	Yes	Yes	Yes	Yes
Sulphur dioxide & Sulfites (>10ppm)	●	●	●	●	●	No	No	No	No
Tree nuts such as almond, brazil nut, cashew, hazelnut (filbert), macadamia, pecan, pine nut, pistachio and walnut	●	●	●	●	●	No	No	No	No
Yam and yam products					●	No	No	No	No



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## Product Information

### BSE (Bovine Spongiform Encephalopathy) and TSE (Transmissible Spongiform Encephalopathy)

SweetRight® products do not contain and are not processed or packaged with any animal products, by-products or animal derived products.

### Drug Substance / Isoflavones / WADA

ADM Dry Honey products, which may contain soy protein products, are not manufactured or warehoused with substances listed on the Annex A of the NSF 306-Certification Guideline for Athletic Banned Substances or the NFL/NFLPA Banned Substance List.

However, soy proteins naturally contain Isoflavones, which do have aromatase and selective estrogen receptor modulation activity. Section S4 of The WADA 2019 Prohibited List, effective January 1, 2019, states that “Selective Estrogen Receptor Modulators (SERMs), including but not limited to. . .” are prohibited. As this list is not specific, ADM can only state the following products, which may contain soy, are “free from” Hormone and Metabolic Modulators as specifically identified by the discrete chemical name on the above identified lists and not by a more general class of compounds. Typical total isoflavone levels range between 1.0 – 3.0 mg/g.

The other ingredients in this product are not manufactured with (nor do they contain) narcotics, psychotropic drugs, or aggressive substances.

### Ingredient Composition (Dry Basis)

Honey 30%	Wheat Starch 27-28%	Soy Flour 2-3%	Soy Lecithin <1%
High Fructose Corn Syrup 29-30%	Corn Syrup 8.5-9.5%	Calcium Stearate <1.5%	

### Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986 in Title 27 of the California Code of Regulations, commonly known as “Proposition 65”, requires businesses to provide a “clear and reasonable” warning when they knowingly and intentionally cause an exposure to an OEHHA listed chemical, and prohibits the discharge of listed chemicals into sources of drinking water. Its purpose is to protect the state’s drinking water sources and provide California residents assistance in making informed decisions regarding exposure to listed chemicals that cause cancer or reproductive effects in purchased products and at physical sites. After review of the SweetRight® products, it is ADM’s position that a Proposition 65 warning label is not required for these products as none contain listed chemicals at levels above “no significant risk.”

### Ready to Eat (RTE)

The Food and Drug Administration (FDA) defines a ready-to-eat (RTE) food in 21 CFR 117.3 as “any food that is normally eaten in its raw state or any other food, including a processed food, for which it is reasonably foreseeable that the food will be eaten without further processing that would significantly minimize biological hazards.”

Following the guidelines laid out by the Food Safety Modernization Act (FSMA), SweetRight® products are not considered a RTE food since ADM markets and labels it as a business to business product, and it is not considered readily foreseeable that SweetRight® products will be consumed without further processing. ADM therefore recommends you conduct a risk assessment of the ingredient and determine if additional processing is required, by you the customer, in order to use for your finished RTE application.

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## Product Information

### Residuals

The amendment of Annex III on Maximum Residue Levels (MRLs) in Regulation (EU) No 396/2005 sets new levels for Chlorate in and on certain foods. The amendment takes into account that in specific situations chlorate residues are present in foods other than the use as pesticides, such as processing aids, through drinking water (for cleaning as well as processing) in compliance with respective legal requirements.

Chlorate is not intentionally added to ADM Dry Sweeteners. Chlorate levels present may result from drinking water use in process or chlorine disinfectant use on equipment.

Some foods can show tendencies for chlorate accumulation which can cause higher chlorate presence. The use of chlorine disinfectants and chlorinated water that is used within the process, is in compliance with all local requirements and an eventual accumulation and chlorate presence is unavoidable. This is in compliance with Annex III, Regulation (EU) No. 396/2005 as no other chlorate contamination source is utilized in the process.

ADM is monitoring through regular testing to keep the accumulation within the ALARA principle.

### Source Material

SweetRight® products are manufactured within the boundaries of the United States of America and never outside its boundaries prior to shipment to this date.

The ingredients used in this product are sourced from the following countries:

- Honey – a blend of imported Honey which may include USA, Argentina, India and Vietnam sources.
- High Fructose Corn Syrup & Corn Syrup – USA
- Wheat Starch – USA and/or Canada
- Soy Flour – USA
- Calcium Stearate – Singapore
- Soy Lecithin – USA

### Miscellaneous Exclusionary Statement

ADM SweetRight® products are produced following the U.S. Food and Drug Administration current Good Manufacturing Practice guidelines. The following compounds are not knowingly introduced directly or through processing aids during production, storage, or shipment. These compounds are not expected to be present, and therefore are not specifically tested for presence or absence.

- |                        |  |  |
|------------------------|--|--|
| • Additives            | • Irradiation/Radioactivity                  | • Paraben or Paraben-related compounds     |
| • Antibiotics          | • (Iso)paraffin, mineral oil, and petrolatum | • Phenylalanine                            |
| • Dyes                 | • Latex                                      | • Phthalates                               |
| • Enzymes              | • Melamine (or cyanuric acid)                | • Perfluorinated Compounds (PFCs)          |
| • Ethylene Oxide (ETO) | • Monosodium Glutamate                       | • Preservatives                            |
|                        | • Nanotechnology                             | • Partially Hydrogenated Oils / Trans Fats |
|                        | • Nitrosamines                               | • Sewage and Sludge                        |
|                        |  | • Sulfates                                 |



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## Food Safety & Quality Information

### FDA Bioterrorism Registration

The U.S. Public Health Security and Bioterrorism Preparedness Response Act of 2002 requires registration with the U.S. Food and Drug Administration of facilities that manufacture, process, pack, or hold food for human or animal consumption in the United States. The 2010 Food Safety Modernization Act requires a re-registration of these facilities prior to December 31, 2010 and biennially thereafter. ADM manufacturing facilities within our distribution network have completed the re-registration as part of these requirements.

### Food Safety Modernization Act (FSMA) Compliance

Food Safety Modernization Act (FSMA) compliance dates for the following programs are in affect for ADM. ADM has enacted programs to comply with the requirements.

- Preventative Controls for Human Food
- Preventative Controls for Animal Food
- Reportable Food Registry Notification (RFR)
- Sanitary Transportation Guidelines
- Foreign Supplier Verification

### Letter of Guarantee

ADM hereby warrants and guarantees that the SweetRight® products sold to you has been approved by the US Food and Drug Administration for their use in foods or are Generally Recognized As Safe (GRAS), or exempt from the provisions of the 1958 Additives Amendment to the Federal Food, Drug and Cosmetic Act, and are allowed for sale in Canada.

We further guarantee that none of the foregoing products comprising any shipment or other delivery now in transit or hereafter made to you is, as of the date of shipment or delivery, adulterated or misbranded within the meaning of the Federal Food, Drug and Cosmetic Act or any practically similar state or municipal law, or is an article which many not under Section 404 or 505 of said Act, be introduced into interstate commerce. All of the foregoing is a continuing guarantee, subject to revocation upon written notice.

### Current Good Manufacturing Practices and GFSI

ADM certifies that this product is manufactured following current Good Manufacturing Practices (cGMP) as defined by FDA 21 CFR Part 117. Our programs have been audited and are currently GFSI certified and have been since 2014. Our quality program includes, but is not limited to the following procedures and guidelines.

- Allergen Control
- Auditing Procedures
- Calibration Procedures
- CAPA Program
- cGMP Requirements
- Chemical Control Program
- Cleaning Procedures
- Glass, Brittles, & Plastic Program
- Food Safety Plan / HACCP
- In-Process Controls
- Incoming Good Requirements
- Internal Auditing
- Isolation of Rejected Materials
- Issuance of Certificate of Analysis
- Issuance of Product Specifications
- Laboratory Technician Training
- Management of Change
- Master Manufacturing Plan
- Out-of-Specification Handling
- Outsourced Services
- Personnel Training
- Pest Control
- Pre-requisite Programs
- Preventative Maintenance
- Product Withdrawal and Recall
- Recording of Sampling Data
- Records Retention
- Release of Finish Goods
- Retain Samples
- Significant Change Notification
- Site Security
- Specification Requirements Review
- Supplier Management
- Traceability & Mock Recall



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## Food Safety & Quality Information

### HACCP Summary and Flow Diagram

Food Safety Plans are an integral piece of our quality and food safety systems. SweetRight® Honey Powder is produced at the Stanley, WI manufacturing facility. A cross-functional team of colleagues have reviewed annually, at a minimum, manufacturing hazard analysis and risk assessments to ensure accuracy and adequacy.

### Biological Risk Summary

Biological hazards are rare and not enhanced during processing. The product is subjected to a thermal processing step in which temperatures reach a minimum of 150° F for a minimum of one hour. The final dry powder product, with less than 5% moisture, has been found to have a water activity of <0.25.

### Physical Risk Summary

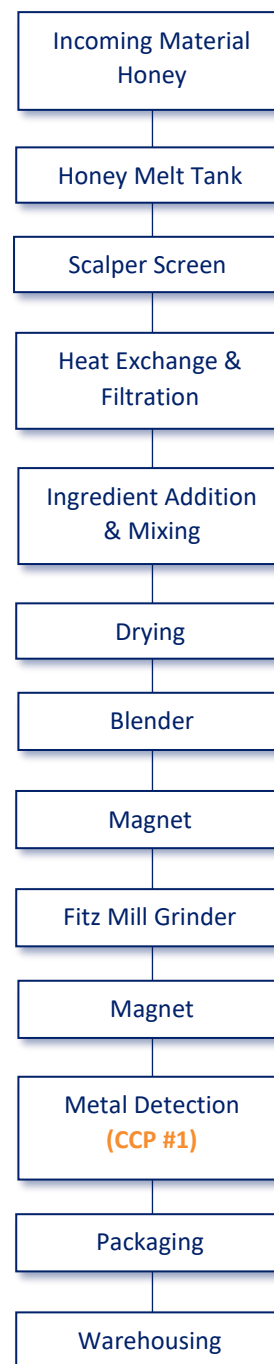
Dry Honey Powder is produced in closed and dedicated equipment so physical hazards are not generally associated with the product. A simplified process flow diagram showing the major processing steps and Process Preventative Controls is shown to the right. The product passes through an operating inline metal detector (**CCP #1**) prior to packaging.

*Boxed Product:* The final metal detector limits are set to detect

- 1.0 mm non-ferrous,
- 1.0 mm Ferrous, and
- 1.5 mm Stainless Steel

### Chemical Risk Summary

Ingredients used in the manufacture of dry honey products are subjected to a risk analysis. Chemical hazards are evaluated from the inputs into the process. All materials are Food Grade and restricted from direct contact where applicable.





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## Social Programs

### Animal Testing

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ADM ingredients have and continue to be predominantly used in food and/or feed products, but also have use in cosmetic and/or household products. We do not animal test ingredients to determine safety or efficacy for cosmetic uses.

In our food ingredients business, we occasionally work with animals to evaluate the nutritional value and safety of ingredients intended for human and/or animal consumption. This work is intended to help us meet standards set by regulatory authorities. ADM works closely either with universities or with contractors whose work is closely evaluated by review boards charged with ensuring that animal trials are safe, humane and ethically designed and conducted.

### California Transparency in Supply Chains Act and UK Modern Slavery Act

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A critical component of ADM's efforts to enrich lives around the world is our commitment to creating positive impacts for the people throughout our value chain, and the communities in which we live and work. As part of that commitment, ADM is proud to disclose its efforts to eliminate slavery and human trafficking in product supply chains, in compliance with the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015.

ADM, its subsidiaries and its joint ventures strongly support human rights, and we expect our business partners to treat their employees with dignity and respect. We will never knowingly use suppliers who employ or exploit legally underage workers or forced labor, and will not condone such practices. In order to enforce these strict standards, we have implemented multiple programs and policies related to our human rights commitments. For more information, please visit <https://www.adm.com/sustainability/downloads>.

### Code of Conduct

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ADM has long maintained a Code of Conduct to help our company achieve the right results, the right way. The Code establishes high standards of honesty and integrity for all ADM colleagues and business partners, and sets forth specific policies to help ensure that our company conducts business fairly and ethically at all times, everywhere we operate. The Code also offers guidance on the appropriate handling of situations in which personal and business interests have the potential to conflict. We invite you to explore the ADM Code of Conduct by visiting: <https://www.adm.com/our-company/the-adm-way/code-of-conduct>.





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## Social Programs

### National Bioengineered Food Disclosure Statement

On December 21, 2018, the Agricultural Marketing Service, USDA released the final rule establishing the new mandatory National Bioengineered Food Disclosure Standard (NBFDS). The NBFDS requires food manufacturers, importers, and other entities that label foods for retail sale to disclose information about bioengineered (BE) food and BE food ingredients. This rule is intended to provide a mandatory uniform national standard for disclosure of information to consumers about the BE status of foods. This rule is effective from February 19, 2019 and has an implementation date of January 1, 2020. The mandatory compliance date for BE labeling is January 1, 2022.

7 CFR 66.6 contains a *List of Bioengineered Foods* for which bioengineered versions have been developed. Requirements for disclosure and non-disclosure need to be followed for listed foods. This list is maintained and updated by AMS and contains:

***Alfalfa, apple (Arctic varieties), canola, corn, eggplant (BARI Bt Begun varieties), papaya (ringspot virus-resistant varieties), pineapple (pink flesh), potato, salmon (AquaAdvantage), soybean, squash (summer), and sugar beet.***

Under 7 CFR 66.1 *Bioengineered Food* is defined as a “a food that contains genetic material that has been modified through in vitro recombinant deoxyribonucleic acid (rDNA)”

ADM SweetRight® Honey Powder contains Soy Flour which may be derived from bioengineered crops, and contain protein that has detectable amounts of rDNA.

ADM SweetRight® also contains High Fructose Corn Syrup, Corn Syrup and Soy Lecithin which have all been purified through a multi-step process that will remove protein, DNA and other impurities. Annual testing for the presence of recombinant DNA using ISO standard PCR analysis has shown repeatedly non-detectable limits (0.01% limit of detection) for the CaMV 35s promoter and NOS terminators for corn syrups and all the common markers for soy markers.

Thus, foods derived from crop varieties listed above where rDNA is not present (not detectable through analytical testing) do not require disclosure in line with 7 CFR 66.100 under the National Bioengineered Food Disclosure Standard, while the presence of detectable rDNA will require disclosure.

### Natural Classification

There is no formal FDA definition for the term “natural” except as it is defined for “natural flavors” under 21 CFR 101.22. The below mentioned food ingredients do not fit the definition of “flavor”. Additionally, the FDA is not restricting the use of the term “natural” except as it applies to 21 CFR 101.22. ADM does not provide labeling advice with use of this product. We advise that you consult legal counsel.

### Organic Classification

ADM SweetRight® products are not organic certified.



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## Social Programs

### SEDEX

ADM Stanley has been audited on the basis of the Supplier Ethical Data Exchange (SEDEX). In this audit, an approved auditing firm verifies to what extent suppliers assume their social responsibility and satisfy general ethical principals in the fields of health care, employee rights, job security, job satisfaction and environmental protection. The ADM plant in Stanley, WI SEDEX registration number is ZS403030864.

### Sustainability

ADM believes there is a direct relationship between the health of the planet and our natural resources, and the health of our business and communities in which we operate. More and more, consumers around the world expect their food and drink to come from sustainable ingredients, produced by companies they trust. ADM has a complete sustainability website to share our vision, actions, and accomplishments: <https://www.adm.com/sustainability>.

### Vegetarian

ADM SweetRight® products are considered suitable for vegetarian diet. The packaging components used for ADM SweetRight® Honey Powder products do not contain ingredients of animal origin.