



SweetRight® HS Tack X

Product Code 115898

Technical Information

Product Description

SweetRight® Tack Blend X is a specialty formulated dry blend of ingredients. It can be used as an adhesive and browning agent in oil roasted nuts and other snack applications.

Specification

<u>Proximate Analytical Data</u>	<u>Limit</u>	<u>Method</u>
*Moisture, % Max	6.0	ANP.060.101.4
pH	4.0-6.5	
Brookfield Viscosity, cps (20°C, 46% solution)	150-285	
*Granulation		
On 25 USBS, % Max	0	ANP.060.741.2
On 60 USBS, %	0-5	ANP.060.741.2
On 200 USBS, %	15-90	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
<i>*reported on COA</i>		

Other Information

Ingredient Statement

Maltodextrin, lactose and xanthan gum

Regulatory Information

Country of Origin: United States

GRAS Affirmation

Social Suitability

Kosher Dairy (OU certified)

Halal certified (IFANCA)

Vegetarian compatible

Available Pack Size

35 lb. corrugated carton with polyethylene inner bag. Ten cartons per layer, four layers per pallet (1,400 lb. net)

Storage and Shelf Life

Shelf life is guaranteed 24 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: 230101

This lot is the first batch packed on January 1, 2023.

Manufacturing Address

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



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Nutrition Information

Nutrient /100g		Other Essential Vitamin & Mineral /100g	
*Total Calories	380 kcal	Vitamin A (RAE)	0 mcg
Total Fat	0.04 g	Vitamin C	0 mg
Saturated Fat	0 g	Thiamine	
Trans Fat	<0.02 g	Niacin	
Polyunsaturated Fat	0 g	Vitamin D	
Monounsaturated Fat	0 g	Vitamin E	
Cholesterol	0 g	Vitamin B6	
*Total Carbohydrates	95 g	Vitamin B12, µg	
Total Sugars	15 g	Folic Acid, µg	
Sugar Alcohols	0 g	Biotin	
Added Sugars	15 g	Vitamin K	
Dietary Fiber	0 g	Pantothenic Acid	
Soluble Fiber	0 g	Riboflavin	
Insoluble Fiber	0 g	Phosphorus	
Protein	0.01 g	Magnesium	
Calcium	0 mg	Zinc	
Iron	0 mg	Copper	
Sodium	43 mg	Manganese	
Potassium	0 mg	Selenium	
<i>*calculated values</i>		Chromium	
		Molybdenum	
		Iodine	
		Fluoride	
		Sulfites	
		Chloride	

Packaging

35 lb. box: 10x10x16 inch corrugated cardboard box with separate blue 4 mil polyethylene bag that is closed by heat seal.

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) No Regulation 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	●	●	●	●	●	No	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	●	●	●	●	●	Yes	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	●	●	●	●	●	No	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

Drug Substance / Isoflavones / WADA

SweetRight® products are not manufactured with (nor do they contain) narcotics, psychotropic drugs or aggressive substances.

Ingredient Composition (Dry Basis)

Maltodextrin 82.5-87.5%	Xanthan Gum 1% or less
Lactose 13-17%	

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.

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.



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Product Information

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



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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® HS Tack X 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 final dry powder product, with less than 5% moisture, has been found to have a water activity of 0.3 – 0.4.

Physical Risk Summary

Nut Coatings are 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 blend 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

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

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

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 food that contains genetic material that has been modified through *in vitro* recombinant deoxyribonucleic acid (rDNA)”

Thus, foods won 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.

ADM SweetRight® HS Tack X contains Maltodextrin, which may be derived from bioengineered crops. ADM has conducted the validation of the corn processing system, by testing incoming seeds and the finished product going through the documented refining process. As expected, the PCR results were positive for seed while the refined finished product, Maltodextrin tested all negative.

SweetRight® HS Tack X also contains Xanthan Gum, which also may be derived from bioengineered crops. The refined Xanthan Gum has been purified through a multi-step process that will remove protein, DNA, and other impurities. Periodic 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.

Based on testing data on hand and our knowledge and experience with the process, we are expecting that foods containing SweetRight® HS Tack X will not require disclosure under the National Bioengineered Disclosure Standard.

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 Lacto-Vegetarian and Lacto-Ovo Vegetarian diets. The packaging components used for SweetRight® products do not contain ingredients of animal origin.