



September 23, 2020

To Whom It May Concern:

This letter is in response to your recent inquiry regarding United Sugars Corporation's sugar.

The sugar sold by United Sugars is produced only from sugarcane and sugarbeets that have been approved for cultivation and processing by the USDA, FDA, and EPA. Beginning with the 2008 harvest, the beet sugar marketed by United Sugars is produced from bioengineered sugarbeets (H7-1).

The National Bioengineered Food Disclosure Standard (NBFDS) states that highly refined foods or ingredients that do not contain detectable modified genetic material are not bioengineered (BE) foods, thus do not require labeling. Those subject to mandatory bioengineered food disclosure are to keep sufficient records to establish compliance.

The refining process removes the genetic material from the raw agricultural product which has been validated through testing. Several published studies have demonstrated that genetic material is not detectable in refined beet or cane sugar. U.S. Department of Agriculture (USDA) determined that only foods containing detectable genetic material are to be considered as bioengineered.

Based on the scientific evidence from the published studies in addition to the USDA determinations of highly refined foods and detectable limits, refined beet or cane sugar does not require BE food disclosure or labeling as the finished product does not contain detectable genetic material.

Sincerely,

Janet Harriman  
Quality and Safety Manager  
Phone: (952) 896-0434  
Email: [jharrima@unitedsugars.com](mailto:jharrima@unitedsugars.com)