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December 18, 2024

To Whom It May Concern:

Re: Food Safety (HACCP) Plan - Arm & Hammer™ Flow K™ Potassium Bicarbonate (Muscle Shoals, AL)

The facility has implemented the FDA Rule, "Final Rule for Preventive Controls for Human Food, September 17, 2015" (aka 21 CFR Parts 1, 11, 16, 106, 110, 114, 117, 120, 123, 129, 179, and 211; current Good Manufacturing Practice; Hazard Analysis Risk-Based Preventive Controls for Human Food) and SQF Code. Our food safety and food defense plans include a Hazard Analysis Risk based Preventive Control (HARP-C) evaluation and is prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission Hazard Analysis and Critical Control Point (HACCP) guidelines.

The inherent safety of our product (from a biological perspective) and process, (from a chemical and physical perspective) along with our robust prerequisite programs, ensure our product is food safe.

Potassium Bicarbonate Control Measures:

Biological:	Process temperature destroys any microbes present (potassium carbonate reactor operates >500°F) Will not support microbial growth - low water activity / no source of nutrition
Chemical:	Analytical and physical process parameters
Physical:	Enclosed, dedicated process with no human contact Metal detection

Feel free to contact me with any questions.

Regards,

Robert G. Berube

Manager, Technical Service

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Rabert & Berule