

# T L C

## INGREDIENTS

16901 ADVANTAGE AVENUE • CREST HILL, IL 60403 • PH 815-723-9900 • FX 815-723-9909 • [www.tlcingredients.com](http://www.tlcingredients.com)

July 28, 2021

To Whom It May Concern:

The purpose of this letter is to address concerns regarding TLC Ingredients' compliance with the Food Safety Modernization Act of 2011, and with the Food and Drug Administration Bioterrorism Preparedness and Response Act of 2002.

TLC Ingredients has conducted a complete assessment of the FSMA regulations and associated rules, as well as a full gap analysis between FSMA and our existing Food Safety Management System. We are confident that we are in full compliance with all applicable FSMA rules, including:

1. Foreign Supplier Verification Programs (FSVP) for Importers of Food for Humans and Animals Final Rule
  - a. FDA's Food Safety Modernization Act (FSMA) requires food suppliers to perform Foreign Supplier Verification (FSV) to ensure that non-US ingredients are made with the same level of Food Safety required of US producers.
  - b. TLC has conducted an assessment and determined that over 88% of all food products sold by TLC Ingredients are made in the USA.
  - c. FDA FSMA guidance on the FSVP rule states: "For the purposes of FSVP, an importer is the U.S. owner or consignee of a food offered for import into the United States."
    - i. In a limited number of cases, TLC Ingredients is the consignee of certain food ingredients.
    - ii. Even in those cases where TLC is not the "importer", TLC will treat all food products manufactured outside the U.S. as if we were the importer.
    - iii. TLC Ingredients has adopted a policy requiring that all vendors supplying products which are manufactured outside of the United States must have a 3<sup>rd</sup> party food safety audit certificate.
2. Mitigation Strategies to Protect Food Against Intentional Adulteration Final Rule
  - a. TLC has implemented, and routinely internally audits, rigorous facility security and Food Defense plans.
3. Preventive Controls for Human Food (and Food for Animals) Final Rules
  - a. TLC has thorough and effective GMP / Standard Operating Procedures in place to assure the highest levels of Food Safety.
  - b. TLC has implemented a fully-functional Hazard Analysis Critical Control Point (HACCP) Plan
  - c. A recall and withdrawal plan, which is routinely tested to assure its effectiveness.
  - d. TLC Ingredients operates with Preventative Control Qualified Individuals (PCQI) that have the responsibility of supporting the requirements of the Food and Safety Modernization Act (FSMA).

#### 4. Sanitary Transportation of Human and Animal Food Final Rule

- a. TLC Ingredients does not use temperature controls for the factory packaged goods that are distributed, but inbound and outbound inspections of trailers are completed, as part of shipping Standard Operating Procedures (SOP) following GFSI requirements.

TLC Ingredients has a fully functioning Global Food Safety Initiative (GFSI) program developed against the IFS Logistics Standard. All external audits of this program have resulted in TLC Ingredients, Inc. receiving the highest audit rating. This program includes the following elements:

- Senior Management Responsibility
- Quality and Product Safety Management System
- Resource Management
- Realization of Service
- Traceability and Recall procedures
- Measurements, Analysis and Improvements
- Product-Food Defense and External Inspections

TLC Ingredients, Inc. is also registered with the Food and Drug Administration (FDA) and is in full compliance with the FDA Bioterrorism Preparedness and Response Act of 2002, having a FDA registration number of: 15619691078

Further, as a member of the National Association of Chemical Distributors (NACD), TLC Ingredients is committed to running its business based on the twin foundations of both Responsible Distribution (RD) and the IFS Logistics Standard by taking full advantage of the synergies of both programs to promote continuous improvement in the critical areas of environmental, health, safety, security and product safety.

If you have any questions, please feel free to contact us.

Respectfully,

Tommy Turriff  
President  
TLC Ingredients, Inc.