



March 1, 2023

Subject: Detrex HACCP and Food Safety Statement

To whom it may concern,

Hazard Analysis of Critical Control Points (HACCP) is a process of assessing the various hazards and risks in a manufacturing or supply chain operation, determining the points where controls can be applied to eliminate or reduce those hazards to an acceptable level, to establish control ranges and limits for monitoring the manufacturing or supply chain operation, and to establish a monitoring frequency based on risk. HACCP is a commonly accepted tool to assess a food processing operation or supply chain for food safety risks.

The Food Safety Modernization Act (FSMA) introduced the concept of Hazard Analysis and Risk Based Preventative Controls (HARPC) for food safety. HACCP is the accepted risk assessment tool for HARPC.

Detrex Chemicals' manufacturing process is a continuous process operation. We do not run a batch operation. Therefore, we are required to continuously operate our process to the most stringent set of product and analytical criteria for the various grades of product we manufacture, such as drug grade. The controls and procedures implemented by Detrex to meet to meet FDA good manufacturing practice regulations for the manufacture of our drug grade products also assures the quality of any food grade Hydrochloric Acid we produce.

Detrex Chemicals executed a hazard assessment as required by 21 CFR, section 211.117, and developed and implemented a food safety plan which identifies both risk based preventive and pre-requisite controls. Our hazard assessment process and the development of our food safety plan was conducted under the leadership of a Preventive Controls Qualified Individual (PCQI).

Sincerely,

A handwritten signature in black ink that reads "Dave Morgan". The signature is written in a cursive style.

Dave Morgan
Global Product Manager, Hydrochloric Acid
Detrex Chemicals