



February 18, 2021

Subject: Detrex Nutritional Labeling Statement

To whom it may concern,

Detrex Hydrochloric Acid packaged for food applications are, in accordance with the Food Drug and Cosmetic Act considered bulk packages of product used for further manufacturing or packaging operations. Detrex does not package HCL into consumer packages.

Title 21 of the United States Federal Code of Regulations (CFR) Part 101.9(j)(9) contains a listing of exemptions from the requirements for nutritional labeling on food packages. In accordance with current Federal regulatory requirements Detrex products are exempted from having nutritional labeling on the packages they produce. That exemption is codified in the following language, which is drawn directly from the regulation where exemptions to the above noted regulatory requirement;

*“Food products shipped in bulk form that are not for distribution to consumers in such form and that are for use solely in the manufacture of other foods or that are to be processed, labeled, or repacked at a site other than where originally processed or packed.”*

Based on Detrex Chemicals’ interpretation of current U.S. Regulatory requirements our Hydrochloric Acid products are exempt from the requirements to have nutritional information on their package label.

Sincerely,

A handwritten signature in black ink that reads "Dave Morgan". The signature is fluid and cursive, with the first name "Dave" being more prominent than the last name "Morgan".

Dave Morgan  
Global Product Manager, Hydrochloric Acid  
Detrex Chemicals