



October 7, 2021

RE: The National Bioengineered Food Disclosure Standard

To Whom it May Concern,

The National Bioengineered Food Disclosure Standard, passed by Congress in July of 2016, directed the United States Department of Agriculture (USDA) to establish a national mandatory standard for disclosing foods that are or may be bioengineered. The National Bioengineered Food Disclosure Standard (Standard) was published on December 20, 2018.¹

USDA Definition of Bioengineered Foods: A food that contains genetic material that has been modified through in vitro rDNA techniques and for which the modification could not otherwise be obtained through conventional breeding or found in nature.¹

USDA Definition of What is Not a Bioengineered Food:¹

- Incidental additives
- Ingredients or products in which the modified genetic material is not detectable
 - Modified genetic material is not detectable if: Records verify the food is made from a non-bioengineered food,
 - Records verify the food has been refined using a process validated to render the modified genetic material undetectable, or
 - Testing records for specific foods confirm the absence of detectable modified genetic material.

S&F Foods, Inc. has gathered the required information necessary to determine which manufactured products contain ingredients that may be sourced from a bioengineered material. It should be noted, formulation and ingredient order of predominance impact the decision-making process as does the recognized threshold that allows for the inadvertent or technically unavoidable presence of a bioengineered substance – up to 5% in each ingredient. In addition, highly refined products are exempt from the Standard disclosure.

S&F Foods, Inc. has concluded that all School Foodservice items currently manufactured do not contain any bioengineered ingredients.

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¹ USDA Agricultural Marketing Service National Bioengineered Food Disclosure Standard Fact Sheet