



2nd Aug 2024

Mr. Zhiwen Teh  
President  
TrueTech Inc  
8 THE GRN STE A, DOVER, DE USA 19901

## Subject: Written Assurance of Compliance for Cacao Molasses - FDA Foreign Supplier Verification Program (FSVP)

Dear Mr. Zhiwen Teh,

### Overview

I am writing on behalf of Cooper Cabruca to provide you with a written assurance of our compliance with the FDA Foreign Supplier Verification Program (FSVP) requirements for the importation of cacao molasses to TrueTech Inc under the small importer modified exemptions rule. As a trusted supplier of cacao molasses, we are committed to ensuring the safety and quality of our products in accordance with regulatory standards.

Cooper Cabruca is dedicated to upholding the highest food safety standards, and we are proud to affirm that our operations are compliant with the regulations set forth by Brazil's FITOSanitario certification. FITOSanitario (copy attached) is equivalent to the FDA regulations in the USA, ensuring that our products meet stringent safety and quality criteria. Each shipment will have the following accompanying certifications:

- FITO Sanitario certification

To address potential hazards associated with cacao molasses, Cooper Cabruca has implemented comprehensive preventive controls across our entire production process. Our commitment to food safety begins with the selection of raw materials.

Our process begins with the harvesting of cacao pods from the cacao tree (*Theobroma cacao*), followed by the removal of the cacao beans from the pods through a process called shelling.



These hazards can include biological, chemical, or physical contaminants that could pose a risk to human health if not properly managed. Identifying and controlling critical points is crucial for ensuring the safety of imported food products and preventing potential health risks to consumers.

#### Harvesting of Cacao Pods

Harvesting stage involves carefully picking ripe cacao pods from the trees. Pods are collected to ensure they are free from visible signs of contamination, damage, or insect infestation. Proper hygiene practices are followed during harvesting to prevent microbial contamination.

#### Shelling of Cacao Pods

Shelling involves removing the cacao beans from the pods, taking care to prevent contamination.

#### Extraction of Cacao Honey

Extraction involves using a press to obtain cacao honey from the cacao beans, which is then frozen within 24 hours to preserve quality and safety.

#### Storage of Frozen Cacao Honey

This stage involves storing the frozen cacao honey in a freezer until it is ready for further processing. Cacao honey are frozen between negative 18 to 20 degree celsius.

#### Boiling

Boiling involves heating the frozen cacao honey with sugar to reduce water content and thicken the mixture, resulting in cacao molasses for a period of 2.5 hours.

#### Packaging

Packaging involves filling sealed bottles with cacao molasses, ready for distribution and consumption, while ensuring packaging materials prevent cross-contamination and maintain product freshness.

#### Shipping

Cacao molasses are shipped to their destination using proper packaging to ensure they reach their destination in optimal condition. Temperature and humidity controls are maintained during shipping to preserve quality.



#### Stage 4: Storage of Frozen Cacao Honey

- **Biological Hazards:**
  - Microbial growth during thawing or temperature fluctuations
  - Contamination from nearby sources (e.g., other products)
- **Chemical Hazards:**
  - Off-flavors or odors from nearby products
  - Contamination from nearby chemical sources
- **Physical Hazards:**
  - Temperature fluctuations affecting product quality
  - Physical damage to storage containers

#### Stage 5: Boiling

- **Biological Hazards:**
  - Microbial growth during boiling or cooling
  - Contamination from equipment or handling
- **Chemical Hazards:**
  - Residues from cleaning or sanitizing agents
  - Contamination from nearby chemical sources
- **Physical Hazards:**
  - Equipment malfunction (e.g., hot surfaces)
  - Foreign objects in boiling equipment

#### Stage 6: Packaging

- **Biological Hazards:**
  - Contamination from equipment or handling
  - Microbial growth during packaging or storage
- **Chemical Hazards:**
  - Residues from cleaning or sanitizing agents
  - Contamination from nearby chemical sources
- **Physical Hazards:**
  - Equipment malfunction (e.g., sharp edges)
  - Foreign objects in packaging materials



### Shelling of Cacao Pods

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Cross-contamination from equipment or handling	Biological	High	Medium to High	Sanitize equipment, train handlers, use dedicated equipment	No visible signs of contamination
Microbial growth on beans	Biological	Medium	High	Discard cacao pods that appear contaminated.	No visible signs of contamination
Residues from cleaning or sanitizing agents	Chemical	Low to Medium	Medium	Follow approved cleaning schedules, monitor residue levels	No visible signs of contamination
Contamination from nearby chemical sources	Chemical	Low	High	Monitor nearby activities, use buffer zones, test air and water	No detectable levels of contaminants
Broken shells or fragments in beans	Physical	Medium	Low to Medium	Inspect beans visually to remove broken shells	No visible shell fragments
Equipment malfunction (e.g., sharp edges)	Physical	Low to Medium	Medium to High	Regularly inspect and maintain equipment, train operators	No equipment malfunctions or damage

### Extraction of Cacao Honey

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Microbial growth in extractor or equipment	Biological	Medium	High	Regular cleaning and sanitizing of equipment	Microbial count within acceptable limits
Contamination from handling or equipment	Biological	Medium	High	Implement proper hygiene practices Wear protective gear (e.g., gloves, masks)	No visual signs of contamination
Residues from cleaning or sanitizing agents	Chemical	Low	Medium	Proper rinsing of equipment after cleaning	Residual levels of cleaning agents below established limits



				Regular inspection of storage area and containers	
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### Boiling

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Microbial growth during heating	Biological	Medium	High	Rapid heating to prevent microbial growth  Monitor heating process to ensure consistent boiling until cacao molasses is at concentration level that prevents microbial growth  Regular cleaning and sanitizing of equipment	Temperature reduced to safe levels within specified time
Contamination from equipment or handling	Biological	Medium	High	Proper hygiene practices Regular cleaning and sanitizing of equipment Wear protective gear (e.g., gloves, masks)	No visual signs of contamination
Residues from cleaning or sanitizing agents	Chemical	Low	Medium	Proper rinsing of equipment after cleaning  Use approved cleaning agents	Residual levels of cleaning agents below established limits
Contamination from nearby chemical sources	Chemical	Low	High	Proper storage and handling of chemicals  Isolate cacao honey boiling from chemical-related processes	No evidence of cross-contamination with chemicals
Equipment malfunction (e.g., hot surfaces)	Physical	Medium	Medium	Regular maintenance of equipment  Monitor boiling conditions (e.g., temperature, pressure)	Equipment functioning within operational parameters
Foreign objects in boiling equipment	Physical	Low	Medium	Regular inspection of equipment  Use screens or filters	No foreign objects detected in final product

### Packaging

Hazard	Type	Probability	Severity of	Preventive Controls	Critical Limit
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Cross-Contamination	Biological	Low	Low	The package used for shipping will be sealed and resistant to humidity.  Use sturdy and appropriate packaging materials to protect cacao nibs during shipping.	Package should be well sealed. During visual inspection upon arrival of cargo, the package should not be damaged.
Physical damage due to improper packaging or handling during transit.	Physical	Medium	Low	The package used for shipping will be sealed and resistant to humidity.  Use sturdy and appropriate packaging materials to protect cacao nibs during shipping.	Package should be well sealed. During visual inspection upon arrival of cargo, the package should not be damaged.

### Prevention against allergens introduction

Our following preventive measures aim to prevent the risk of allergen introduction and cross-contact throughout the entire process of preparing cacao molasses, from harvesting to shipping. Regular training, stringent cleaning procedures, and rigorous testing are crucial to maintaining the safety of the product and ensuring compliance with FDA regulations.

Allergen	Probability	Severity of Illness or injury	Preventive Controls
Milk	Medium	Medium	No milk products will be brought on the facility
Eggs	Medium	Medium	No eggs will be brought on the facility
Fish & Crustacean shellfish	Low	Medium	No fish & crustacean shellfish will be brought on the facility
Tree nuts	Low	Medium	No tree nuts will be brought on the facility
Peanuts	Medium	High	No peanuts will be brought on the facility
Wheats	Medium	Medium	No wheats will be brought on the facility
Soybeans	Low	Medium	No soybeans will be brought on the facility

### Prevention against intentional adulterations

In our commitment to upholding the highest standards of food safety and quality, Coopercabruca affirms our unwavering dedication to maintaining the integrity of our products throughout every stage of the supply chain. We wish to assure TrueTech Inc that, in accordance with FDA's Foreign Supplier Verification Program (FSVP) requirements, we pledge not to engage in any of



Next, we extract the cacao honey from the cacao beans using a press. The extracted cacao honey is frozen within 24 hours of extraction.

Next, the cacao honey is boiled along with sugar to reduce the water content and thicken the mixture, resulting in cacao molasses. This step is crucial in ensuring the quality and safety of our product.

Finally, the cacao molasses is packed into sealed bottles, ready for distribution and consumption. Our packaging materials are carefully chosen to prevent cross-contamination and maintain the freshness of the product. Stringent quality checks are conducted throughout the packaging process to ensure that the cacao nibs meet our strict specifications.

Furthermore, Coopercabruca has established a robust traceability system that allows us to track each batch of cacao molasses from their origin to the final packaged product. This traceability mechanism enables us to promptly identify and address any potential issues that may arise.

In support of our commitment to transparency, we are pleased to attach a scanned copy of the GAP certification awarded to Coopercabruca by the Brazilian government. This certification validates our compliance with GAP's regulations and further underscores our dedication to product safety.

With this letter, we also aim to provide a comprehensive overview of our commitment to compliance with the FDA Foreign Supplier Verification Program (FSVP) requirements. As a trusted supplier of cacao molasses, Coopercabruca is dedicated to upholding the highest food safety standards and ensuring the safety and quality of our products in accordance with regulatory standards.

In the following sections, we will delve into the specific processes and measures that we have implemented to address potential hazards associated with cacao molasses and to ensure their safe importation and consumption. Our adherence to Brazil's Good Agricultural Practices (GAP) standards, equivalent to FDA regulations, underscores our commitment to product safety and transparency.

## Hazard Analysis

### Critical control points

This section identifies the critical control points in the process from harvesting to shipping cacao molasses to TrueTech Inc. These are where preventive controls can be applied to minimize or eliminate the risk of food safety hazards.



These objective descriptions outline each stage of the cacao molasses journey and highlight key considerations to ensure compliance with FSVP regulations.

## Potential hazards at critical points

### Stage 1: Harvesting of Cacao Pods

- **Biological Hazards:**
  - Contamination from insects, rodents, or other animals
  - Microbial growth on pods (e.g., mold, bacteria)
- **Chemical Hazards:**
  - Pesticide or fertilizer residues on pods
  - Contamination from nearby chemical sources (e.g., industrial sites)
- **Physical Hazards:**
  - Foreign objects (e.g., rocks, twigs) in pods
  - Damage to pods during harvesting

### Stage 2: Shelling of Cacao Pods

- **Biological Hazards:**
  - Cross-contamination from equipment or handling
  - Microbial growth on beans
- **Chemical Hazards:**
  - Residues from cleaning or sanitizing agents
  - Contamination from nearby chemical sources
- **Physical Hazards:**
  - Broken shells or fragments in beans
  - Equipment malfunction (e.g., sharp edges)

### Stage 3: Extraction of Cacao Honey

- **Biological Hazards:**
  - Microbial growth in extractor or equipment
  - Contamination from handling or equipment
- **Chemical Hazards:**
  - Residues from cleaning or sanitizing agents
  - Contamination from nearby chemical sources
- **Physical Hazards:**
  - Equipment malfunction (e.g., hot surfaces)
  - Foreign objects in extractor or equipment



### Stage 7: Shipping:

- **Biological Hazards:**
  - Humidity Exposure
  - Cross-Contamination
- **Physical**
  - Physical damage due to improper packaging or handling during transit.

## Preventative Controls

Our following preventive controls aim to prevent the risk of hazards introduced throughout the entire process of preparing roasted cacao nibs, from harvesting to shipping. Regular training, stringent cleaning procedures, and rigorous testing are crucial to maintaining the safety of the product and ensuring compliance with FDA regulations.

### Implementation at critical control points

#### Harvesting of Cacao Pods

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Contamination from insects	Biological	High	Medium to High	Inspect fields regularly, use pest control measures	No visible signs of insect contamination
Microbial growth on pods (e.g., mold, bacteria)	Biological	Medium	High	Inspect fields regularly, use pest control measures	No visible signs of insect contamination
Pesticide or fertilizer residues on pods	Chemical	Low to Medium	Medium to High	Only source from organic certified farms	No sourcing of cacao pods from non-organic farms
Contamination from nearby chemical sources (e.g., industrial sites)	Chemical	Low	High	Monitor nearby activities, use buffer zones, test soil and water	No detectable levels of contaminants
Foreign objects (e.g., rocks, twigs) in pods	Physical	Medium	Low to Medium	Inspect pods visually, use cleaning equipment	No foreign objects present
Damage to pods during harvesting	Physical	High	Low to Medium	Use proper harvesting techniques, inspect equipment regularly	No visible damage to pods



Contamination from nearby chemical sources	Chemical	Low	High	Proper storage and handling of chemicals  Isolate cacao honey extraction from chemical-related processes	No evidence of cross-contamination with chemicals
Equipment malfunction (e.g., hot surfaces)	Physical	Medium	Medium	Regular maintenance of equipment  Monitor extraction conditions (e.g., temperature, pressure)	Equipment functioning within operational parameters
Foreign objects in extractor or equipment	Physical	Low	Medium	Regular inspection of equipment  Use screens or filters	No foreign objects detected in final product

#### Storage of Frozen Cacao Honey

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Microbial growth during thawing or temperature fluctuations	Biological	Medium	High	Monitor storage temperature Proper thawing procedures Regular cleaning and sanitizing of storage area	Temperature maintained below freezing point
Contamination from nearby sources (e.g., other products)	Biological	Low	Medium	Separate cacao honey from other products  Regular cleaning and sanitizing of storage area	No visual signs of contamination
Off-flavors or odors from nearby products	Chemical	Low	Medium	Separate cacao honey from strong-smelling products  Proper packaging and sealing of cacao honey containers	No noticeable off-flavors or odors
Contamination from nearby chemical sources	Chemical	Low	High	Proper storage and handling of chemicals  Isolate cacao honey storage from chemical-related processes	No evidence of cross-contamination with chemicals
Temperature fluctuations affecting product quality	Physical	Medium	Medium	Monitor storage temperature  Regular maintenance of refrigeration equipment	Temperature maintained within specified range
Physical damage to storage containers	Physical	Low	Medium	Proper handling of containers	No visible damage to containers



			<b>Illness or injury</b>		
Contamination from equipment or handling	Biological	Medium	High	Proper hygiene practices  Regular cleaning and sanitizing of equipment  Wear protective gear (e.g., gloves, masks)	No visual signs of contamination
Microbial growth during packaging or storage	Biological	Medium	High	Maintain proper packaging and storage temperatures  Monitor packaging and storage conditions	Temperature maintained within specified range
Residues from cleaning or sanitizing agents	Chemical	Low	Medium	Proper rinsing of equipment after cleaning Use approved cleaning agents	Residual levels of cleaning agents below established limits
Contamination from nearby chemical sources	Chemical	Low	High	Proper storage and handling of chemicals  Isolate packaging area from chemical-related processes	No evidence of cross-contamination with chemicals
Equipment malfunction (e.g., sharp edges)	Physical	Low	Medium	Regular maintenance and inspection of equipment	Equipment functioning properly without posing physical hazards
Foreign objects in packaging materials	Physical	Low	Medium	Regular inspection of packaging materials  Use approved packaging materials	No foreign objects detected in final product

## Shipping

<b>Hazard</b>	<b>Type</b>	<b>Probability</b>	<b>Severity of Illness or injury</b>	<b>Preventive Controls</b>	<b>Critical Limit</b>
Humidity Exposure	Biological	Medium	Low	The package used for shipping will be sealed and resistant to humidity.  Use sturdy and appropriate packaging materials to protect cacao nibs during shipping.	Package should be well sealed. During visual inspection upon arrival of cargo, the package should not be damaged.



the below listed intentional adulterations that compromise the safety, purity, and authenticity of our cacao molasses. Our commitment to transparency, traceability, and the meticulous execution of preventive controls reflects our steadfast adherence to regulatory guidelines and industry best practices. TrueTech Inc can trust that our products are delivered with utmost integrity, ensuring the health and satisfaction of consumers.

Potential Adulterations	Description	Preventive Controls
Dilution with Inferior Ingredients	Cacao molasses could be mixed with cheaper or inferior ingredients to increase volume, which might decrease the quality and nutritional value of the product.	An integrity seal will be adhered to the package prior to leaving the facility
Addition of Undeclared Allergens	Adding allergenic ingredients like nuts, dairy, or soy without proper declaration on the label can pose a risk to consumers with allergies.	All facilities will only process non-allergens
Mislabeling Origin	Falsely labeling the origin of the cacao could deceive consumers about the source and quality of the product.	We will conduct a taste sampling test since the taste is very specific to the location
Use of Unauthorized Additives	Adding unapproved additives, preservatives, or flavors to the cacao molasses could be harmful to consumers' health.	No additives are being introduced in the entire process as it is entirely organic.
Adulteration with Unsafe Substances	Adding unsafe substances or contaminants that may not be detectable through routine testing can pose health risks.	No additives are being introduced in the entire process as it is entirely organic.
Contamination with Heavy Metals	Cacao molasses could be contaminated with heavy metals like lead or cadmium, which can be harmful if consumed over time.	CIC will provide certification that there are no traces of heavy metals.
Use of Unsanitary Processing	If the cacao molasses are processed in unsanitary conditions, they could become contaminated with pathogens that may cause foodborne illnesses.	FitoSanitario certification will be provided for each shipment
Substitution with Lower-Quality Varieties	Substituting higher-quality cacao with lower-quality varieties could affect the flavor, aroma, and overall quality of the product.	We will conduct a taste sampling test since the taste is very specific to the location.
Economic Adulteration	Mixing cacao molasses with fillers or additives to reduce production costs while maintaining the appearance of quality.	CIC will provide certification that there are no traces of unauthorized additives within the shipment.

## Conclusion

We greatly value our partnership with TrueTech Inc and the trust you have placed in Coopercabruca as your supplier. Should you require any additional documentation or information regarding our compliance or preventive controls, please do not hesitate to contact us. We are fully dedicated to maintaining the integrity of our supply chain and ensuring the safety of the cacao nibs we provide.



With the overview provided, thank you for your continued collaboration and support. We look forward to contributing to the success of our shared endeavors.

Sincerely,

  
Orlanildes Santos Pereira  
President  
Coopercabruca (DUNS: 946690515)  
[coopercabruca@gmail.com](mailto:coopercabruca@gmail.com)  
+55 73 9978-8453