2nd Aug 2024

Subject: Declaration of Supplier Evaluation for Cacao Molasses as under FDA Foreign Supplier Verification Program (FSVP) for small importer

I, Zhiwen Teh, hereby declare that as the FSVP importer, I have meticulously evaluated and verified that Coopercabruca has undertaken all essential measures to effectively control the hazards identified under the FSVP modified requirements for small importers.

Through comprehensive assessments of their processes, from sourcing and harvesting cacao molasses to their final shipment, I can affirm that stringent preventive controls, monitoring, and corrective actions have been systematically implemented to mitigate potential risks.

Our commitment to maintaining food safety and quality standards is resolute, and I stand behind the accuracy and completeness of this evaluation. It is with confidence that I confirm Coopercabruca's compliance with the FSVP small importer regulations, ensuring the delivery of safe and reliable cacao nibs to our valued partners at TrueTech Inc.

This declaration of evaluation is based on the following hazard analysis outcome and the subsequent preventive control that has been put in place

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 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 30 minutes 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.

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

Identification of potential hazards at critical points

This section highlights the hazards identified at various stages from harvesting to the shipping of cacao nibs from Coopercabruca to TrueTech Inc in the USA

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 4: Storage of Frozen Cacao Honey

- **Biological Hazards:**
  - Microbial growth during freezing 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

Stage 7: Shipping:

- **Biological Hazards:**

    - Humidity Exposure
    - Cross-Contamination
- Physical
    - Physical damage due to improper packaging or handling during transit.
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Preventative Controls

We have evaluated that the following are sufficient preventive measures put in place by Coopercabruca to prevent the risk of hazards introduced throughout the entire process of preparing roasted cacao nibs, from harvesting to shipping.

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 insert contamination
Microbial growth on pods (e.g., mold, bacteria)	Biological	Medium	High	Inspect fields regularly, use pest control measures	No visible signs of insert 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 |

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
Contamination from nearby chemical sources	Chemical	Low	High	Proper storage and handling of chemicals Isolate cacao honey extraction	No evidence of cross-contamination with chemicals

				from chemical-related processes	
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 Regular inspection of storage area and containers	No visible damage to containers

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 Illness or injury	Preventive Controls	Critical Limit
Contamination from equipment or handling	Biological	Medium	High	Proper hygiene practices Regular cleaning and sanitizing of	No visual signs of contamination

				equipment Wear protective gear (e.g., gloves, masks)	
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

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
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.
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	Physical	Medium	Low	The package used for shipping will be sealed and resistant to humidity.	Package should be well sealed. During visual

packaging or handling during transit.				Use sturdy and appropriate packaging materials to protect cacao nibs during shipping.	inspection upon arrival of cargo, the package should not be damaged.

Prevention against allergens introduction

We have access that these are sufficient preventive measures put in place by Coopercabrua to prevent the risk of allergen introduction and cross-contact throughout the entire process of preparing roasted cacao nibs, from harvesting to shipping and it is in compliance with safety requirements under FDA FSVP regulations.

Allergent	**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

We have access that these are sufficient preventive controls put in place by Coopercabrua to prevent intentional adulteration throughout the entire process of preparing roasted cacao nibs, from harvesting to shipping and it is in compliance with safety requirements under FDA FSVP regulations.

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 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 roasted cacao nibs 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 nibs 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 nibs 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.

Sincerely,

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