26th June 2024

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

Subject: Written Assurance of Compliance - FDA Foreign Supplier Verification Program (FSVP)

Dear Mr. Zhiwen Teh,

Overview

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

CEPOTX 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:

- CIC or CVACBA certification along with it to ensure quality assurance,
- IBD NOP certification for the farm
- FITO Sanitario certification

To address potential hazards associated with cacao almonds, CEPOTX has implemented comprehensive preventive controls across our entire production process. Our commitment to food safety begins with the selection of raw materials. We source cacao almonds exclusively from reputable and approved farms, ensuring that they adhere to the highest agricultural and handling practices.

Once the cacao almonds are received at our facility, we meticulously sort, clean, and sanitize them to remove any foreign material or contaminants. The beans then undergo a thorough fermentation, which not only enhances the flavor profile of the cacao almonds but also contributes to the elimination of pathogens.

Following fermentation, the cacao almonds are sun dried and packaged in a controlled environment. 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 almonds meet our strict specifications.

Furthermore, CEPOTX has established a robust traceability system that allows us to track each batch of cacao almonds 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 CEPOTX 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 almonds, CEPOTX 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 almonds 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 roasted cacao almonds 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

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.

Fermenting

During fermentation, cacao almonds are placed in controlled environments where microbial reactions occur. This stage is vital for flavor development. Proper temperature and time controls are maintained to ensure uniform fermentation and prevent undesirable microbial growth.

Drying and Sorting

After fermentation, cacao almonds are dried to a specific moisture content to prevent mold growth and maintain quality. The almonds are sorted to remove any foreign particles, ensuring that only clean beans proceed to the next stage.

Packaging

The final product, cacao almonds, is carefully packaged in a controlled environment to maintain freshness and prevent contamination. Waterproof packaging is used to protect against oxidation and moisture.

Shipping

Cacao almonds 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 almonds’s journey and highlight key considerations to ensure compliance with FSVP regulations.

Potential hazards at critical points

Harvesting:

- **Biological Hazards**:
  - Microbial Contamination (Salmonella)
  - Insect Infestation
- **Physical Hazards**: Foreign objects like rocks, dirt, or debris from the field

Fermenting:

- **Biological Hazards**:
  - Microbial Growth (Salmonella)
  - Undesirable Fermentation
- **Chemical Hazards**: Contamination from pesticides or chemicals used in cacao plantations
- **Physical Hazards:** Inclusion of non-cacao materials in fermentation containers

Drying and Sorting:

- **Biological Hazards**: Mold growth due to improper drying practices.
- **Chemical Hazards**: Residues from cleaning agents or pesticides.
- **Physical Hazards**: Inclusion of foreign objects during drying and sorting.

Processing and Packaging:

- **Biological Hazards:** Cross-contamination from other ingredients.
- **Chemical Hazards**: Residues from cleaning agents or equipment.
- **Physical Hazards:**
  - Inclusion of foreign objects during the packaging process.
  - Metal fragments from processing equipment.

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 almonds, 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

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Microbial Contamination (salmonella)	Biological	Medium	Medium	We only harvest mature and perfect fruit directly from the tree. We utilize Garra tool to handle the fruit to ensure against broken skin which is a vector for contamination.	Harvested mature fruit does not have broken skin which will allow contamination to happen.
Insect Infestation	Biological	Low	Low	For organic cacao, natural organic insect repellents are used. When the environment is balance insect infestation is unlikely	NA
Foreign objects like rocks, dirt, or debris from the field	Physical	Low	Low	When fruits are harvested and broken and the beans are extracted. But the actual removal of this foreign objects are done at the later stage during drying	NA.

Fermenting

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Microbial Growth	Biological	Medium	Medium	This hazard is controlled during the	NA

(salmonella)				roasting critical control point	
Undesirable Fermentation	Biological	Medium	Medium	There are three traditional organic measures for this Measure 1: Smell test. Ensure there are no traces of putrefy smell Measure 2: Ensure PH is below 6. The batch cannot be too alkaline. 4.8 to 5.8PH is ideal Measure 3: Professional taste test.	Ensure there are no traces of putrefy smell Measure to ensure the PH of completed needs to be between 4.8 to 5.8PH Professional taste tester will indicate during tasting
Inclusion of non-cacao materials in fermentation containers	Physical	Low	Low	Fermentation is done in a wood box in the house of fermentation. Nothing else is allowed in the house besides the cacao almonds to be fermentation	Only cacao beans should be allowed to be placed in fermentation containers. No foreign objects will be allowed in the house of fermentation.
Contamination from pesticides or chemicals used in cacao plantations	Chemical	Low	Low	The facility will be located on the farm which has been organically certified. There will be not pesticide or artificial chemicals on the premise	To ensure no pesticide or chemicals are brought on to the premise The farmer continues to maintain organic certification for each batch of shipment. The certificate is an analysis report by CIC

Drying and Sorting

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Mold growth due to improper drying practices.	Biological	Medium	Medium	Turnover the beans frequently in the sun which still contain humidity often to ensure against mold. First 2 days: When sample of cacao almonds is squeezed, if there is humidity, there is the liquid dropped Beans will be turned over every 30 minutes in the sun	No visible mold Lab testing from CIC or CVACBA shall indicate mold shall not be above 3% threshold.

				When sample of cacao almonds is hand squeezed, it cracks 3rd day: Beans will be turned over every 1 hour in the sun 4th to 7th day: 4 to 5 times a day.	
Inclusion of foreign objects during drying and sorting process	Physical	Medium	Medium	Before the dried cacao almonds are collected, they are processed through sieve	Visibility ensure there are no more foreign objects after the sieving process
Residues from cleaning agents or pesticides	Chemical	Low	Medium	The facility will be located on the farm which has been organically certified. There will be not pesticide or artificial chemicals on the premise	To ensure no pesticide or chemicals are brought on to the premise The farmer continues to maintain organic certification for each batch of shipment. The certificate is an analysis report by CIC or CVACBA

Processing and Packing

Hazard		Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Mycotoxin Contamination	Biological	Low	Medium	Implement proper drying and storage practices to prevent mold growth. Regularly test for mycotoxins and reject contaminated batches. Package is sealed properly to ensure against moisture content	CIC or CVACBA will provide certification that Mycotoxin levels in cacao almonds are below the regulatory limits.
Oxidation	Biological	Medium	Low	NA	NA
Metal fragments from processing equipment.	Biological	Low	Low	Implement effective quality control measures to detect and remove foreign objects during processing. Regularly inspect equipment for signs of wear or damage.	Visual inspection that the final product should be free from foreign objects.

Foreign objects introduced during the packaging process.	Physical	Low	Low	Implement controls to prevent foreign objects from entering packaging materials. Use metal detectors or sieves to catch any contaminants before sealing.	The final packaged cacao almonds should be free from foreign objects.
Residues from heavy metals.	Chemical	Low	Medium	Implement a rigorous cleaning and sanitation program to ensure that heavy metals are not introduced during the packing and process of cacao almonds in the facilities.	CIC or CVACBA will provide certification that there are no traces of heavy metals.

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 almonds 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 almonds 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 almonds 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 almonds, 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.

Allergent	Probab	Severity of	Preventive Controls

	ility	Illness or injury	
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, CEPOTX 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 the below listed intentional adulterations that compromise the safety, purity, and authenticity of our cacao almonds. 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 almonds 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 almonds 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 almonds could be contaminated with heavy metals like lead or cadmium, which can be harmful if consumed over time.	CIC or CVACBA wiill provide certification that there are no traces of heavy metals.
Use of Unsanitary Processing	If the cacao almonds are processed in unsanitary conditions, they could become contaminated with pathogens that may cause foodborne illnesses.	MAPA 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 almonds with fillers or additives to reduce production costs while maintaining the appearance of quality.	CIC or CVACBA 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 CEPOTX 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 almonds 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,

JADER ADRIANO DA SILVA SANTOS:71612211291

Assinado de forma digital por JADER ADRIANO DA SILVA SANTOS:71612211291
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