

18th September 2023

Subject: Declaration of Supplier Evaluation 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 nibs 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 roasted cacao nibs 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 beans 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 beans are dried to a specific moisture content to prevent mold growth and maintain quality. The beans are sorted to remove any foreign particles, ensuring that only clean beans proceed to the next stage.

Roasting

Roasting cacao beans brings out their rich flavors. Controlled temperatures and times are employed to achieve the desired flavor profile while minimizing the formation of undesirable compounds like acrylamide.

Cracking and Winnowing

The roasted cacao beans are cracked to remove the outer shell, yielding cacao nibs. Winnowing is performed to separate nibs from the shells, ensuring that the final product is free from shell fragments.

Packaging

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

Shipping

Cacao nibs 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

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.

Roasting:

- **Biological**
 - Acrylamide Formation
 - Over-Roasting
- **Physical Hazards:** Foreign objects like metal fragments from roasting equipment.

Cracking and Winnowing:

- **Biological**
 - Particulate Contamination
 - Cross-Contamination
- **Physical Hazards:**
 - Inclusion of shell fragments or foreign materials in cracked cacao beans.

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

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

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Microbial Contamination (salmonella)	Biological	Medium	Medium	Only harvest mature and perfect fruit directly from the tree. Only 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 (salmonella)	Biological	Medium	Medium	This hazard is controlled during the roasting critical control point	NA
Undesirable Fermentation	Biological	Medium	Medium	<p>There are three traditional organic measures for this</p> <p>Measure 1: Smell test. Ensure there are no traces of putrefy smell</p> <p>Measure 2: Ensure PH is below 6. The batch cannot be too alkaline. 4.8 to 5.8PH is ideal</p> <p>Measure 3: Professional taste test.</p>	<p>Ensure there are no traces of putrefy smell</p> <p>Measure to ensure the PH of completed needs to be between 4.8 to 5.8PH</p> <p>Professional taste tester will indicate during tasting</p>
Inclusion of non-cacao materials in fermentation containers	Physical	Low	Low	<p>Fermentation is done in a wood box in the house of fermentation.</p> <p>Nothing else is allowed in the house besides the cacao nibs to be fermentation</p>	<p>Only cacao beans should be allowed to be placed in fermentation containers.</p> <p>No foreign objects will be allowed in the house of fermentation.</p>
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	<p>To ensure no pesticide or chemicals are brought on to the premise</p> <p>The farmer continues to maintain organic certification for each batch of shipment. The certificate is an analysis report by CIC</p>

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	<p>Turnover the beans frequently in the sun which still contain humidity often to ensure against mold.</p> <p>First 2 days:</p>	<p>No visible mold</p> <p>Lab testing from CIC shall indicate mold shall not be above 3% threshold.</p>

				<p>When sample of cacao nibs is squeezed, if there is humidity, there is the liquid dropped</p> <p>Beans will be turned over every 30 minutes in the sun</p> <p>When sample of cacao nibs is hand squeezed, it cracks</p> <p>3rd day: Beans will be turned over every 1 hour in the sun</p> <p>4th to 7th day: 4 to 5 times a day.</p>	
Inclusion of foreign objects during drying and sorting process	Physical	Medium	Medium	Before the dried cacao nibs 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	<p>To ensure no pesticide or chemicals are brought on to the premise</p> <p>The farmer continues to maintain organic certification for each batch of shipment. The certificate is an analysis report by CIC</p>

Roasting

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Microbial Growth (salmonella)	Biological	Medium	High	<p>The roasting process itself will kill off the microbial growth.</p> <p>The internal temperature of the cacao nibs during roasting reaches 180°C for 30 minutes.</p>	CIC will provide certification that Mycotoxin levels in cacao nibs are below the regulatory limits..
Acrylamide Formation	Biological	Medium	Low	<p>Daily cleaning to ensure properly functioning equipment</p> <p>Required maintenance is performed when malfunction is observed before cacao nibs are processed</p>	<p>Machine is cleaned everyday</p> <p>Mechanics will provide certification that maintenance has been done.</p>
Over-Roasting	Biological	Low	Low	Daily cleaning to ensure properly functioning equipment	Machine is cleaned everyday

				Required maintenance is performed when malfunction is observed before cacao nibs are processed	Mechanics will provide certification that maintenance has been done.
Foreign objects like metal fragments from roasting equipment.	Physical	Medium	Medium	The stove is sealed during roasting Regular maintenance is done on the stove.	Mechanics will provide certification that maintenance has been done.

Cracking and Winnowing

Hazard	Type	Probability	Severity of Illness or injury	Preventive Controls	Critical Limit
Particulate Contamination	Biological	Low	Low	The machine is sealed. Daily cleaning to ensure properly functioning equipment Required maintenance is performed when malfunction is observed before cacao nibs are processed	Mechanics will provide certification that maintenance has been done.
Cross-Contamination	Biological	Low	Low	Clean and sanitize winnowing equipment between batches. Implement proper allergen controls to prevent cross-contact. The facility only processes cacao nibs	No cross-contact with allergens should occur during winnowing. Visual check to ensure undesirable ingredients are in the facility
Inclusion of shell fragments or foreign materials in cracked cacao beans.	Physical	Medium	Low	Use proper cracking and winnowing equipment to minimize shell fragments. Implement visual inspections and sieving to remove foreign materials. Workers are to wear hair mesh and gloves.	Shell fragments in cracked cacao beans shall be less than 3%.

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.	CIC will provide certification that Mycotoxin levels in cacao nibs are below the regulatory limits.

				Package is sealed properly to ensure against moisture content	
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 nibs 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 nibs in the facilities.	CIC 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 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 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

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	Probab ility	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	Roasted cacao nibs 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	Adding unapproved additives, preservatives, or flavors to	No additives are being introduced in the

Additives	the roasted cacao nibs could be harmful to consumers' health.	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	Roasted cacao nibs 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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