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FSMA Compliance/Food Safety Plan Statement

The Food Safety Modernization Act (FSMA) was signed into law on January 4, 2011. To implement the law, the Food and Drug Administration (FDA) has developed seven regulations, each with varying applicability and compliance dates. Edison Grain Incorporated (Edison Grain) is committed to complying with all applicable FSMA requirements and regulations.

Edison Grain has determined that it is subject to the following regulations under FSMA:

- **Preventive Controls for Human Food Rule (PCHF).** Edison Grain is in full compliance with the PCHF Rule (21 CFR Part 117):
 - Edison Grain follows Current Good Manufacturing Practices (cGMPs).
 - Edison Grain has three trained Preventive Controls Qualified Individuals (PCQIs) on staff. Team members receive required training and are qualified individuals as defined by the rule.
 - Edison Grain has a **Food Safety Plan** with the following elements:
 - Hazard Analysis
 - Preventive Controls (Process, Sanitation, Allergen, and Supply-Chain)
 - Recall Plan
 - Monitoring, Verification, Validation
 - Corrective Actions
 - Edison Grain complies with PCHF record keeping requirements.
- **Foreign Supplier Verification Program (FSVP).** Edison Grain meets the obligations of the FSVP through its compliance with the PCHF rule (see 21 CFR 1.502(c)). Edison Grain complies with section 1.509 of the FSVP.
- **Mitigation Strategies to Protect Food Against Intentional Adulteration (IA).** Edison Grain's compliance date under the IA rule is July 27, 2020. Edison Grain currently has a Food Defense Plan in place, and will ensure that it fully meets the requirements of the IA rule by its compliance date.

Jeffrey E. Barnes
President
Edison Grain Incorporated