

## Exhibit A: Additional Information on the KFL testing

KFL considered a wide variety of factors in assessing whether the coconut water products contained added sugars. KFL used carbon stable isotope ratio analysis (Carbon SIRA scores), oligosaccharide analysis, and sugar profile analysis. The carbon stable isotope ratio method relies upon the differences in the <sup>13</sup>C content of the sugars found in fruit versus those derived from cane or corn. The sugars found naturally in fruits have Carbon SIRA scores in the range of -24 to -26 while added sugars from cane have a score of -12 and corn syrup of -10. Carbon SIRA scores are well-recognized as an effective method in detecting added sugars in fruit juices. FDA recognizes that carbon stable isotope analysis can be used to detect cane or corn sweeteners in orange and apple juices. 1/ In addition, at least one federal court has relied on the testing results from KFL for its finding that the fruit juice contained added sugar. 2/ KFL used an analysis of oligosaccharides to detect minor byproducts of starch-derived hydrolysis syrups such as rice and corn syrup, whereas sugar profile analyses rely on the differences of fructose/glucose ratio between juices and added cane or corn sugars. KFL also tested the products for the presence of sulfites.

Relying on these three analyses, as well as other characteristics of 100% pure juice (e.g., mineral profile), KFL concludes that the market leaders either contained no added sugars or disclosed the presence of the added sugars. KFL identified undeclared added sugars from sources such as hydrolyzed rice starch, high fructose corn syrup, and sucrose in 12 of the products. KFL also found undeclared levels of sulfites in 2 products at levels in excess of 10 ppm, the level that triggers labeling under the relevant FDA requirements. 3/ Sulfites frequently can be found in coconut water given the manner in which much of the coconut water is harvested throughout South East Asia. Many farmers harvest the coconut on the farm and collect the coconut meat and the water. The raw and unpasteurized coconut water is then transported to a packaging facility that may be some distance away from the farm. In many instances, the farmers add sulfites to prevent the coconut water from spoiling during transport. Given this common practice, suppliers collecting coconut water in this manner should label the presence of sulfites in the coconut water.

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1/ Relevant Section of FDA's Inspection Guide is available at: <http://www.fda.gov/ICECI/Inspections/InspectionGuides/ucm096410.htm>.

2/ *Pom Wonderful LLC. v. Purely Juice, Inc.*, No. 08-56375 (9th Cir. Dec. 28, 2009).

3/ 21 C.F.R. 101.100(a)(4).

**Exhibit B: Summary of KFL Test Results**

<b>Category (1) Samples without Added Sugars</b>				
<b>Sample #</b>	<b>Packaged</b>	<b>Products</b>	<b>Labels/Claims</b>	<b>KFL Test Results</b>
A3355	Packaged in U.S.	Zico Pure Premium Coconut Water, 14 oz Plastic (Indonesia)	<ul style="list-style-type: none"> <li>“100% coconut water”</li> </ul>	<ul style="list-style-type: none"> <li>Results are consistent with pure coconut water</li> </ul>
A3356	Packaged in U.S.	Zola 100% Natural Coconut Water, 1L Tetra Prisma	<ul style="list-style-type: none"> <li>“100% natural coconut water”</li> </ul>	<ul style="list-style-type: none"> <li>Results are consistent with pure coconut water</li> </ul>
A3357	Packaged in U.S.	Coco Libre Pure Organic Coconut Water, 11 oz Plastic	<ul style="list-style-type: none"> <li>“pure organic coconut water”</li> <li>“100% organic”</li> </ul>	<ul style="list-style-type: none"> <li>Results are consistent with pure coconut water</li> </ul>
A3376	Indonesia	Naked Pure Coconut Water, 11.2 ounce Tetra Prisma	<ul style="list-style-type: none"> <li>“No sugar added”</li> <li>“100% juice”</li> </ul>	<ul style="list-style-type: none"> <li>Results are consistent with pure coconut water</li> </ul>
<b>Category (2) Group A Samples with Declared Added Sugars</b>				
<b>Sample #</b>	<b>Packaged</b>	<b>Products</b>	<b>Labels/Claims</b>	<b>KFL Test Results</b>
A3371	Philippines	Vita Coco Pure Coconut Water 16.9 oz Tetra Prisma	<ul style="list-style-type: none"> <li>“pure coconut water”</li> <li>“100% natural”</li> <li>“100% juice”</li> <li>Ingredient statement discloses “less than 1% natural fruit sugar”</li> </ul>	<ul style="list-style-type: none"> <li>Contains added sugar</li> </ul>
A3372	Malaysia	Vita Coco Pure Water 16.9 oz Tetra Prisma	<ul style="list-style-type: none"> <li>“pure coconut water”</li> <li>“100% natural”</li> <li>“100% juice”</li> <li>Ingredient statement discloses “less than 1% natural fruit sugar”</li> </ul>	<ul style="list-style-type: none"> <li>Contains added sugar</li> </ul>

<b>Category (2) Group A Samples with Declared Added Sugars</b>				
<b>Sample #</b>	<b>Packaged</b>	<b>Products</b>	<b>Labels/Claims</b>	<b>KFL Test Results</b>
A3373	Sri Lanka	Vita Coco Pure Water 11.1 oz Tetra Prisma	<ul style="list-style-type: none"> <li>• “pure coconut water”</li> <li>• “100% natural”</li> <li>• “100% juice”</li> <li>• Ingredient statement discloses “less than 1% natural fruit sugar”</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> </ul>
A3377	Thailand	Goya Coconut Water with Pulp	<ul style="list-style-type: none"> <li>• Ingredient statement discloses sugar and sulfite</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> <li>• Contains 17.2 ppm sulfite</li> </ul>
<b>Category (2) Group B Samples with Undeclared Added Sugars</b>				
<b>Sample #</b>	<b>Packaged</b>	<b>Products</b>	<b>Labels/Claims</b>	<b>KFL Test Results</b>
A3360	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “With 100% Natural Coconut Water”</li> <li>• “No Sugar Added”</li> <li>• Ingredient statement does not disclose added sugar</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added hydrolyzed starch syrup</li> </ul>
A3361	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “100% Coconut Water”</li> <li>• “No Added Sugar”</li> <li>• “No Sugar or Artificial Sweetener Added”</li> <li>• Ingredient statement does not disclose added sugar</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> </ul>
A3363	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• Ingredient statement does not disclose added sugar</li> <li>• Label does not disclose sulfite</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> <li>• Contains 14.1 ppm sulfite</li> </ul>
A3364	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• Ingredient statement does not disclose added sugar</li> <li>• Label does not disclose sulfite</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> <li>• Contains 19.03 ppm sulfite</li> </ul>

<b>Category (2) Group B Samples with Undeclared Added Sugars</b>				
<b>Sample #</b>	<b>Packaged</b>	<b>Products</b>	<b>Labels/Claims</b>	<b>KFL Test Results</b>
A3365	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “100% Pure Young Coconut Water”</li> <li>• Ingredient statement does not disclose added sugar</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> </ul>
A3366	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• Ingredient statement does not disclose added sugar</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> </ul>
A3367	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “Unsweetened”</li> <li>• Ingredient statement does not disclose added sugar</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> </ul>
A3368	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “No Added Sugar”</li> <li>• Ingredient statement does not disclose added sugar</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar</li> </ul>
A3369	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “100% Pure Coconut Water”</li> <li>• Ingredient statement does not disclose added sugar</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sugar and hydrolyzed starch syrup</li> </ul>
A3894	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “100% Juice”</li> <li>• “100% Natural Coconut Water”</li> </ul>	<ul style="list-style-type: none"> <li>• Results are atypical for pure coconut water. The product may contain a small quantity of added sucrose.</li> </ul>
A3960	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “No added sugar”</li> <li>• “100% juice”</li> </ul>	<ul style="list-style-type: none"> <li>• The results are not consistent with pure coconut water. The product contains added sucrose</li> </ul>
A4079	Thailand	REDACTED	<ul style="list-style-type: none"> <li>• “100% natural coconut water”</li> <li>• “No preservatives or added sugar”</li> </ul>	<ul style="list-style-type: none"> <li>• Contains added sucrose</li> </ul>