HACCP Statement

Animal Protein
North America

Beef Harvest

Thank you for requesting general information regarding specific initiatives at Cargill protein beef harvest establishments in the US and Canada. Cargill employs a validated multi hurdle intervention system in the production of our quality beef products at all of our harvest facilities.

The following facilities are inspected and verified by the United States Department of Agriculture (USDA) Food Safety Inspection Services (FSIS), harvest and process only bovine species at their facility, and no other species or ingredients of animal origin are utilized in these processes. The USDA Establishment numbers covered by this letter include:

Facility Location	FSIS Establishment #	FDA Registered
Friona, TX	86E	Yes
Dodge City, KS	86K	Yes
Schuyler, NE	86M	Yes
Fort Morgan, CO	86R	Yes
Wyalusing, PA	9400	Yes

Canadian beef harvest facilities have similar and equivalent programs to those in the U.S. The following facilities are inspected and verified by Canadian Food Inspection Agency (CFIA) harvest and process only bovine species at their facility, and no other species or ingredients of animal origin are utilized at these facilities. These facilities meet or exceed the requirements of the Canadian Food Inspection Agency (CFIA), as well as USDA import requirements:

Facility Location	CFIA Establishment #	FDA Registered
High River, AB Canada	93	No
Guelph, ON Canada	51	No

With regard to Cargill's Food and Drug Administration (FDA) Facility Registrations, Cargill's facility registrations were renewed on or before December 31, 2024 and are in effect through December 31, 2026. Registration numbers are considered as being confidential; therefore, Cargill does not disclose that information. As applicable, Cargill adheres to the requirement for FDA inspected facilities to be registered pursuant to the Public Health and Bioterrorism Preparedness and Response Act of 2002, and the current FDA Food Safety and Modernization Act. Locations manufacturing products that are federally inspected by the USDA FSIS or the CFIA are not required to register.

General Food Safety Programs

Cargill is committed to the safety and quality of our products. All Cargill beef harvest facilities are in compliance with all USDA and/or CFIA regulations, as appropriate and all edible products are produced under a fully implemented Hazard Analysis and Critical Control Points (HACCP) Plan, which meets all requirements set forth in 9 CFR 417 and/or the Safe Food for Canadian Regulations (SFCR). Additionally, Cargill facilities have in place Sanitation Standard Operating Procedures (SSOPs) that meet all requirements of 9 CFR 416 and/or the SFCR.

Facilities that harvest and process raw beef products do consider *E. coli* O157:H7 and specified Non O157 Shiga Toxin *E. coli* (STEC) as a 'hazard reasonably likely to occur" in Harvest HACCP plans. As interventions, fed cattle beef harvest facilities in the U.S. and Canada have installed hide-on carcass wash, pre-evisceration rinse cabinets, post-evisceration acid rinse cabinets, and steam pasteurization cabinets. Cow harvest facilities have combinations of the following installed interventions; hide-on carcass wash, steam vacuums, acid rinse cabinet, and steam pasteurization cabinets or hot water treatments. To eliminate or reduce the identified hazards to below detectable levels, Cargill has identified thermal pasteurization in the form of validated steam pasteurization intervention or validated hot water treatment as a Critical Control Point (CCP) for beef carcasses, the thermal pasteurization CCP is validated by scientific research and internal use of time/temperature monitoring probes. These validation procedures meet the requirements of 9 CFR 417 and the SFCR. Cargill has identified an acid rinse cabinet as a validated intervention for red meat offal removed prior to the thermal pasteurization. All CCP and control point critical limits are monitored at a frequency to ensure process control. Additionally, a peroxyacetic acid based antimicrobial agent is being applied immediately prior to packaging of subprimals. This agent is recognized by USDA-FSIS (Directive 7120.1) and CFIA as a "processing aid", therefore, there is no implication to labeling or including it in the ingredient statement. This treatment has been microbiologically validated in the facilities utilizing indicator microorganisms.

In addition, all harvest facilities perform extensive microbiological tests on carcasses and other beef products that serve as verification that the intervention system is functioning as designed. Cargill's harvest facilities located in the U.S. and Canada participate in USDA-FSIS Salmonella performance standards sampling (or equivalent sampling program) and sample carcasses for generic E. coli using the protocol designed in accordance with the requirements stated in 9 CFR 310.25. Moreover, all facilities also conduct routine environmental sampling for product contact pre-operational cleanliness at a variety of points in the production system. Depending on the facility, the microbiological monitoring includes testing for Aerobic Plate Count (APC), coliforms, and/or generic E. coli. Monitoring results are evaluated on an ongoing basis for trend analysis of the facility and products. Furthermore, all Cargill beef harvest facilities have supporting prerequisite programs encompassing:

- Good Hygiene Practices (GHPs)
- Foreign Material Control
- Retrieval and traceability procedure to ensure proper identification for all materials coming into/through the system and leaving the system.
    - Retrieval procedures are in place at each production facility such that in an emergency all products that are produced can be traced as product codes and volumes shipped, to the first level of distribution. Each of our production facilities has a Retrieval team made up of personnel identified according to the necessary disciplines needed for prompt action. Members of the team include Operations, Supply Chain, Transportation, Business and Sales, Food Safety, Quality, and Regulatory (FSQR), Corporate Affairs, Legal and Information Technology (IT) personnel, as necessary. These procedures are practiced at a minimum of annually to ensure effectiveness in the ability to trace all products and ensure all team members are competent in their roles.
    - In the event of a natural disaster or other crisis situation that renders a production facility inoperable, Cargill has production contingency plans that involve other Cargill facilities, as well as approved External Manufacturers.
- Pest Control Program
- Product Hold Program
- Food Defense Program
    - Facilities are access controlled, fenced and/or guarded. At all production establishments, visitors are restricted, except under certain strictly controlled circumstances. Food defense procedures have been in place for some time, and Cargill reviews these procedures on a regular basis.

- Allergen Control Program
    - Allergens have been considered in the hazard analysis for each Cargill facility and, where appropriate, programs have been established around the handling of any allergen containing ingredients.
    - Additionally, all established allergen programs are a part of internal audits and annual third party GFSI certified audits.
- Livestock Program
    - A livestock program to require all cattle producers to certify compliance with 21 CFR 589.2000, Animal proteins prohibited in ruminant food.

Supplier Approval Programs (https://www.cargill.com/about/external-sem-manual)

Cargill recognizes that the quality and safety of the products we produce is strongly influenced by the quality and safety of the materials we receive and is committed to only using material from suppliers that meet or exceed our requirements. Cargill requires that all raw material suppliers comply with all applicable government regulations and meet the following requirements in order to become and remain an approved supplier:

- HACCP
    - Raw beef purchased from the United States or Canada are USDA/CFIA inspected facilities operating under a implemented HACCP program.
        - Foreign facilities must be operating under “equivalent” inspection programs and certified by USDA-FSIS to export to the US or CFIA to export to Canada.
        - Meet the USDA Salmonella Performance Standards – for products sold to or within the United States.
    - Facilities shall have validated interventions to control E.coli O157:H7.
    - Microbiological Testing
        - All ground beef components will be sampled and tested for E. coli O157:H7. An N=60 equivalent (such as cloth swabbing) or better sampling method must be used. Cargill will not accept product that tests presumptive positive for E. coli O157:H7.
        - Intact lot loads must arrive with a negative certificate of analysis or product notification document.
        - Verification Sampling including STEC 6 must be completed per our supplier agreements.
        - Facility must have an effective “event period” program including actions on subprimals.
    - Suppliers must have adequate segregation programs, if handling multiple species in one location, to ensure there is no risk of substitution and the labeled species is accurate.
- SSOPs, Pre-requisites and Training
    - Beef supplier facilities must have implemented written SSOPs/Pre-requisite and training programs sufficient to ensure that all processing and handling equipment that contacts the meat or poultry is cleaned and sanitized properly and that sanitation effectiveness is monitored during pre-operational inspection.
- Live Animal Handling
    - Beef harvests facilities must have programs that:
        - Exclude non-ambulatory disabled livestock as defined by FSIS 6900.2, Rev. 2.
        - Are in compliance with FSIS Directive 6100, Rev. 2 Ante-Mortem Livestock Inspection, Final Regulations for Non-Ambulatory Disabled Cattle and Specified Risk Materials (SRMs) or the SFCR.
        - Require all animals be handled in a manner compliant with the current “Recommended Animal Handling Guidelines and Audit Guide” published by the North American Meat Institute (NAMI) Foundation.

- Beef Supplier Audits
    - Beef supplier facilities must schedule, conduct and maintain certification against a Global Food Safety Initiative (GFSI) certification or equivalent audit.
    - As applicable, must have conducted an animal handling audit by a PAACO trained or equivalent auditor annually.
- Non-Meat Ingredient Suppliers
    - Must have an annual 3rd party GFSI or industry equivalent audit.
    - In corporate a food safety plan within their process, sufficient to identify and control hazards.
    - Provide a specification for products supplied to Cargill.
    - Complete an allergen assessment or other necessary documentation to support claims and/or nutritional panels.
- Beef Raw Meat Suppliers must also comply with:
    - Facility shall have validated interventions to control *E.coli* O157:H7 STECs.
    - Microbiological Testing
        - All non-intact beef components will be sampled and tested for E. coli O157:H7. An N=60 equivalent or better sampling method must be used. Cargill will only accept product that tests presumptive positive for E. coli O157:H7 with documented agreement.
        - Intact lot loads must arrive with a negative certificate of analysis or product notification document.
        - Verification Sampling including *Shiga Toxin Escherichia coli* (STEC 6) must be completed per our supplier agreements.
        - Facility must have an effective "event period" program including actions on subprimals, if appropriate.

Non O157 Shiga Toxin *E. coli*

Cargill refers to the Non O157 STEC6 (with *E. coli* O157:H7 as STEC7). As referenced in both FSIS Directive 10,010.1 revision 4 dated 8/20/15 and FSIS Directive 10,010.2 dated 7/01/2020 regarding verification activities, FSIS has carried out verification procedures, including sampling and testing manufacturing trim harvested on and after June 4, 2012 to ensure control of both *Escherichia coli* O157:H7 and six other serogroups of STEC (O26, O45, O103, O111, O121 and O145). Published research documents show the existing E. coli O157:H7 pathogen reduction technologies are effective on the STEC6. Therefore, no changes to pathogen control programs were implemented due to the reassessment. However, Cargill continues to collect and review necessary data from baseline research and testing methods for STEC7 and reassess accordingly.

STEC7 Control and Testing

As a part of our continuing food safety efforts, in facilities that test raw ground beef components, Cargill utilizes a Test and Hold program. A 'Product Notification Document' (PND) is sent to the customer receiving the tested raw ground beef components (the 'ship to' customer). This information contains the lot number of the product, the result, test method and other comments regarding the lab results. If you are not considered the 'ship to' customer, then this information would be sent to your sales representative or broker. Cargill's "PND" has been accepted with no objections by USDA and CFIA, as an alternative method to Certificate of Analysis (COA)[1].

A Test and Hold program is also in place in some facilities producing and testing finished ground beef. The statements of testing compliance are on the transportation bill of lading (BOL)[2].

[1] Please verify that your supplier program accepts a PND in lieu of a COA.
[2] Please ensure your supplier programs accept a BOL statement in lieu of a COA (if appropriate).

A similar Test and Hold program is in place for all components destined for use in raw ground products such as Hearts, Head Meat, Cheek Meat, Weasand Meat, Tongue Root, PDCB, FTB and other raw ground beef components[3]. Cargill would like to outline certain key aspects of its *E. coli* verification-testing program:

- Beef Trim lot integrity will always be kept intact. Lots will not be broken or split to cause combos within a lot to be sent to different customers.
- A robust N=60 surface excision sample program (such as cloth swabbing) is used for boxed and combo trim and other comboed raw beef components such as whole muscle meats sampled for *E. coli* O157:H7. A minimum of 60 samples are taken per lot, whether the lot is 1 combo or maximum of 5 combos.
- Note that Cargill does not sample and test any vacuumed packaged boxed primal or subprimal products since they are intended solely for intact product use. We would strongly encourage our customers to not use traditional boxed beef primals and subprimals in raw ground products and instead purchase trim in a combo or box or purchase grinds. This will ensure you have a test result meeting regulation requirements and a microbiologically independent lot. See the section of this letter entitled Vacuum Packaged Beef Subprimals Not Intended for Grinding for additional details.
- Ground Beef 95% lean product group [including Finely Textured Beef (FTB) and product variations including Primal specific products (i.e. Round, Sirloin and Chuck), Breed specific products (i.e. Angus, Certified Angus Beef), and Grade specific products (i.e. Choice); this product is also known in the marketplace as Beef Trimmings Finely Textured (BTFT) and (Canada Only) Finely Textured Beef Trimmings (BTFT)] sample program is in place where individual box sampling is performed for each lot and a minimum of 375g is tested. This program is used to meet the FSIS best practice expectation that customers conduct on-going verification of its incoming product and the SFCR.
- Partially Defatted Chopped Beef (PDCB) and Partially Defatted Cooked Chopped Beef (PDCCB) are also involved in sampling programs in which individual box sampling is performed for each lot and a minimum of 375g is tested.
- Cargill utilizes 3rd party accredited laboratories to conduct the tests.
- BioControl Assurance GDS, a PCR based test method, is utilized for *E. coli* O157:H7 and STEC6 testing. No cultural confirmation is completed for *E. coli O157:H7*. Disposition is determined on a presumptive positive test result. Cultural confirmation may, on occasion, be completed for STEC6.
- Cargill has a third-party verification program of its *E. coli* O157:H7 sampling program. Under this program, raw ground beef components are ground, sampled and analyzed to verify the effectiveness of sampling technique. The verification program is conducted at a minimum of once quarterly with an increased frequency during high prevalence months (April through September). This program is used to meet the FSIS best practice expectation that customers conduct on-going verification of its incoming product and the SFCR. Cargill has chosen to also test STEC6 within this program to provide additional data for review and verification of the interventions effectiveness on STEC6.

Event Period Protocol

Cargill has an “Event Period” program that when an abnormal number of presumptive positive *E. coli* O157:H7 results on trim and/or ground beef have occurred in the same production day, a facility will hold and evaluate previously tested negative like-kind products. During this evaluation, a determination is made on whether or not products that previously tested negative may be associated with the presumptive positive product. If product is associated, that product is held and removed from the raw ground beef material stream. Untested subprimal products may be evaluated for determination of association with the positive raw ground beef components as well. Additional details are available in separate letter.

[3]Please note that vacuum packaged beef subprimals in a box have not been tested and are not intended for use in ground beef products.

Vacuum Packaged Beef Subprimals Not Intended For Grinding

Each Cargill facility produces subprimal products packaged into vacuum bags and either boxed or placed into combos that are not tested and are intended solely for intact use. Cargill expects any customers who purchase vacuum

packaged primals in boxes or combos, and utilizes these products for non-intact processes, to address the specific usage within their HACCP plan.

Cargill also produces tested trim and subprimal products that are not bagged and packaged in lined boxes or combos. Tested products are intended for non-intact use, such as grinding, needle tenderizing or injection.

3rd Party Audits

Cargill Beef Harvest facilities have obtained certification under an approved Global Food Safety Initiative (GFSI) standard. In addition, each facility is evaluated by a 3rd party auditing firm using an E. coli addendum, Animal Welfare (including transportation) by a PAACO Certified auditor and SRM audit annually

Control of Specified Risk Materials

Cargill is very cognizant of the concern of Bovine Spongiform Encephalopathy (BSE) occurring in North America and has joined others in requiring our suppliers of live cattle to verify that the cattle we purchase from them are in compliance with FDS CFR 9 589.2000. Operations at our facilities are governed by applicable USDA/CFIA regulations, including all additions pertaining to the exclusion of "Specified Risk Materials (SRMs)" from the human food supply. Cargill Beef harvest facilities are in compliance with FSIS-2007-0015, Final Regulations for Non-Ambulatory Disabled Cattle and Specified Risk Materials (SRMs) or the SFCA. All SRMs are segregated from Human food and discarded to inedible rendering, incinerated or landfilled:

- The tonsils and spinal cords are removed from all carcasses.
- The skull including brains, eyes and trigeminal ganglia are sent to landfill from all cattle 30 months and older.
- In order to ensure the complete removal of the dorsal root ganglia, the vertebral column of cattle aged 30 months and older (excluding the vertebrate of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) will be removed during fabrication and discarded to inedible rendering, incinerated or landfilled.
- Carcasses are segregated according to age based on the guidelines presented in FSIS-2007-0015 or the SFCR. to ensure proper disposal of SRMs from cattle 30 months or older.
- Eighty inches of small intestines including the distal ileum as measured from the ileocecal junction is discarded to rendering.
- No air injection stunning is used.
- Cattle identified as over 30 months of age are identified in the finished product containers at the Canadian facilities with either a triangle 3 marking or a 'CD' as the first digits of the item number on the finished box label. CD item codes also have ONLY FOR DOMESTIC SALE IN CANADA on a box or combo label.
- US facilities follow labeling directives 6100.1, 6100.4 and 7160.1 for proper identification of products.
- Condemned cattle not undergoing antemortem inspection are not processed by the facility and are removed by a licensed rendering facility or send to a landfill/composting.

Animal Handling

Cargill is committed to meeting all applicable regulations that pertain to animal handling and the proper care of animals as regulated by the USDA/ CFIA Animal Welfare regulations, as well as the current North American Meat Institute (NAMI) Good Management Practices for Animal Handling. The following information is provided to demonstrate our commitment to Animal Welfare:

- Cargill has a systematic approach to humane handling that meets or exceeds FSIS Directive 6900.2 and/or the SFCR and Meat Inspection Regulation 57.
- Cargill has training programs in place specifically designed to address animal handling issues. The NAMI training guidelines developed by Dr. Temple Grandin are the foundation of this program.
- Industry experts have been used to design equipment and review the animal handling and slaughter process.
- An independent 3rd party Professional Animal Auditor Certification Organization (PAACO) trained auditor completes yearly audits. In addition, Cargill completes internal daily monitoring audits, as well as independent 3rd party daily observation audits to ensure animal handling requirements are continuously met.
- All Cargill Beef Harvest facilities have a PAACO certified auditor on site.

Export

To ensure all products meet or exceed the standards set for export into other countries, Cargill specifies certain products and produces them under the standards set forth for export into those countries. All products should be verified to be eligible for export to that country prior to producing the finished product for export. All products are adequately labeled to provide the necessary required information to complete Form 9060-6 for export.

Residue Testing

All US Cargill Meat Solutions establishments are federally inspected by trained FSIS/USDA veterinarians, which inspect and test suspect carcasses for chemical residues. In addition, FSIS Directive 10,800.1 “Procedures for Residue Sampling, Testing, and other Responsibilities for the National Residue Program” and its Clarification Notice 44-01 outline procedures for random evaluation of carcasses. Each Public Health Veterinarian (PHV) located at each Cargill Facility will follow the random sampling request sent to them from the Office of Public Health Science (OPHS). Any sampled carcasses are retained until sample results are returned and found to be negative. Additionally, all Canadian Cargill establishments are also Federally inspected under the supervision of CFIA veterinarians. The inspection staff follows the random sampling plan to test for residues as outlined in the CFIA “National Chemical Residue Monitoring Program”. The facilities have implemented acknowledgement forms that producers sign to ensure understanding and compliance with the requirements for animals to be suitable for human consumption at the time of harvest.

General Statements

Cargill beef harvest facilities are continuously striving to minimize pathogenic bacteria contamination through the implementation of proven new technology and advanced testing programs, while at the same time exploring new technologies as they come into existence.

Cargill believes our food safety program sets the standard for the industry, but at the same time, neither we, nor for that matter, anyone is able to guarantee pathogen free raw materials. Accordingly, we want to reiterate the importance of proper handling and cooking of all raw meat products by you and your customers. Cargill commits to ensure prompt updates to our documents upon any changes to our procedures or processes.

References:

Published Non-O157 STEC documents can be found from the NAMI Foundation website: http://www.namif.org/research/

BIFSCo Best Practices for Processing Raw Ground Beef Products www.bifsco.org/bestpractices.aspx

FSIS Directive 10,010.1 (pages 58 – 60) http://www.fsis.usda.gov/Regulations_&_Policies/index.asp

Compliance Guidelines for Establishments on the FSIS Microbiological Testing program and other verification activities for *Escherichia coli* O157:H7 April 13, 2004 http://www.fsis.usda.gov/oppde/rdad/fsisdirectives/10010_1/ecolio157h7dirguid4-13-04.pdf

USDA Export Checklist http://origin-www.fsis.usda.gov/regulations_&_policies/Export_Checklist/index.asp

Revision History:

3/28/2025 – Added footnotes.
1/1/2025 – Removed the Fresno, CA facility from plant listing. Updated FDA registration dates.
1/1/2024 – Reviewed, no changes needed.
1/1/2023 – Updated FTB to Ground Beef 95%, added verbiage around cloth swabbing, transferred to new template
11/22/2022 transferred statement to the Thrive template.
1/1/2022 – Reviewed, no changes needed
1/1/2021 – Updated FDA registration dates
7/20/20 – Updated revision date for FSIS Directive
10,010.2 1/1/20 – updated wording to improve sentence
flow.
3/11/19 – updated references from CFIA MOP to The SFCR
1/1/19 – Add a General Statement section and updated FDA registered dated.
4/30/18 – Added statement saying product with CD on the label is for only Domestic Sale In Canada.
3/6/18 – Updated FDA Registered facilities.
2/1/18 – Updated identification of cattle over 30 months of age from Canadian facilities.
1/2/18 – Added "product hold program", added "by a PAACO Certified auditor" to the Animal Welfare (including transportation) statement. Added cattle not undergoing antemortem inspection statement. Updated 30 month of age identification statement. Changed "Recall" to "Retrieval" and updated team names under retrieval point. Changed format. Updated Approved Supplier Programs section. Added Bioterrorism and FDA registration numbers statement.
6/29/17 – added the "Finely Texture Meat" statement.
1/7/17 – Added the 'dba' statement; made grammatical and clarification language updates.
1/7/16 – Removed Milwaukee facility references. Added single species statements, updated allergen control section, added supplier approval requirements, added Canadian chemical residue program statement, added CFIA animal welfare regulation reference and made grammatical and clarification language updates.

***Claims**: The labeling, substantiation and decision making of all claims for your products is your responsibility. We recommend you consult regulatory and legal advisors familiar with all applicable laws, rules and regulations prior to making labeling and claims decisions for your products.*

Contact

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