



January 12, 2022
 To: Cargill Customers
 Re: Cargill Non-Harvest Further Processed Product HACCP Letter

Dear Valued Customer

Thank you for requesting general information regarding specific initiatives at Cargill Meat Solutions Corporation and Cargill Limited, dba Cargill Protein, (collectively hereinafter, "Cargill") non-harvest further processed products establishments in the United States and Canada. These facilities may produce raw seasoned or unseasoned non-intact meat and poultry, par fried or heat treated meat and poultry or fully cooked whole or further cut meat and poultry products, and fully cooked soups and sauces. The USDA Establishments covered by this letter include:

<u>Facility Location</u>	<u>FSIS Establishment #</u>	<u>FDA Registered</u>
Albert Lea, MN	2133 / P-29	Yes
Columbus, NE	86C / P-86C	Yes
Fort Worth, TX	21171 / P-21171	Yes
Nashville, TN	21171A / P-21171A	No
Nebraska City, NE	86J / P-7117	No
Timberville, VA	511 / P-7935	Yes
Waco, TX	635 / P-635	Yes
Round Rock, TX	46069/P-46049	Yes
Vernon, CA	45053/P-45053	Yes

The Canadian non-harvest further processed products establishments covered by this letter maintains Canadian Food Inspection Agency's (CFIA) Food Safety Enhancement Program (FSEP), which has been recognized as similar and equivalent to USDA requirements. The below establishments are Federally registered and HACCP recognized as described in Section 3 of the CFIA FSEP Manual.

<u>Facility Location</u>	<u>CFIA Establishment #</u>	<u>FDA Registered</u>
London, ON	470	No

With regard to Cargill's Food and Drug Administration (FDA) Facility Registrations, Cargill's facility registrations were renewed on or before December 31, 2020 and are in effect through December 31, 2022. 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 facilities are in compliance with all applicable USDA, FDA and/or CFIA regulations and are operating under a fully implemented Hazard Analysis and Critical Control Points (HACCP) Plan and/ or Preventive Control (PC) Plan, which meets all requirements set forth in 9 CFR 417 and/or Canadian Meat Inspection Regulations Section 30.1 and/or 21 CFR 117 or 21 CFR 530. The USDA/FDA inspected facilities that cook products have critical control points/preventive control points regarding lethality, stabilization and post lethality processes, as applicable to the product type. Other processes are covered by temperature controls. All Cargill establishments processed products facilities reassess their HACCP/PC plans annually or as their processes change in compliance with the requirements described in 9 CFR 417.4 or Section 3.4 of FSEP. Additionally, Cargill establishments have in place Sanitation Standard Operating Procedures (SSOPs) that meet all requirements of 9 CFR 416, 21 CFR 117 subpart B or CFIA, Chapter 3, Section 3.9 in the Manual of Procedures (MOP). Furthermore, Cargill establishments have in place written supporting programs encompassing:

- Good Hygiene Practices (GHPs)
- Foreign Material Control

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- Retrieval and traceability procedure to ensure proper identification for all products 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 an 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.
- Intended use
 - Raw vacuum packaged beef subprimals utilized for non-intact processes have been assessed accordingly within the facility HACCP plans. Any raw beef items sold from these establishments are not intended for use as a component for ground or raw beef, but intended to be fully cooked prior to consumption.
 - Any non-fully cooked, including but not limited to raw, partially cooked, ready to cook or par fried items sold from these establishments are intended to be fully cooked prior to consumption.

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

Cargill has prerequisite programs as a foundation enabling our HACCP systems to function more effectively. Since our facilities do not continuously monitor the manufacturing processes of all materials received into the facilities, we rely on programs such as our Supplier Programs to help mitigate possible biological, chemical and physical hazards. The Supplier Programs provide the mechanisms by which we ensure supplier compliance with our Food Safety/ Quality and specifications requirements.

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 meat and poultry purchased from the United States or Canada are USDA/CFIA inspected facilities operating under a Pathogen Reduction/Hazard Analysis and Critical Control Point (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.
 - 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

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- Meat and Poultry supplier facilities must have implemented written SSOPs/Pre-requisites 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
 - Meat and Poultry 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 CFIA MOP Chapter 17, Annex D.
 - 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. In addition, poultry suppliers shall be compliant with standards set forth by the National Turkey Federation (NTF) Animal Care Guidelines and Best Management Practices and the National Chicken Council (NCC).
- Supplier Audits
 - Meat and Poultry supplier facilities must schedule, conduct and maintain certification against a Global Food Safety Initiative (GFSI) certification 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
 - Incorporate 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

3rd Party Audits

Cargill non-harvest facilities have obtained certification under an approved Global Food Safety Initiatives (GFSI) standard for Food Safety and Quality.

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.

Cargill believes our food safety program sets the standard for the industry. Accordingly, we want to reiterate the importance of proper handling and cooking of all products by you and your customers. Cargill commits to ensure prompt updates to our documents upon any changes to our procedures or processes.

Cargill will continue to strive for excellence in providing our customers with a high-quality product manufactured under strict food safety standards. For additional information and/or updates please visit our website

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<http://www.cargill.com/products/meat-food-safety>. However, should you have any specific questions please contact us at Techsvs_Requests@cargill.com. As a valued customer, we appreciate your partnership and are pleased to help meet your needs.

Sincerely,

Angela L. Siemens, Ph.D.
Vice President Food Safety, Quality & Regulatory
Cargill Protein Group

Revision History:

- 1/1/2022 – Reviewed, no changes needed
- 1/12/2021 – Added Round Rock and Vernon locations
- 1/1/2021 – Updated FDA Registration dates
- 1/1/2020 – added non-fully cooked point under intended use.
- 1/1/19 – Updated FDA Registered dates and facilities
- 3/6/18 – Updated FDA Registered facilities
- 1/2/2018 – Updated format. Separated Canadian facilities out from USA facilities. Changed verbiage to align with other product stream HACCP letters. Added “Product Hold Program”. Updated Retrieval point and changed “Recall” to “Retrieval”. Added “Export” section. Added Bioterrorism and FDA registration numbers statement.
- 1/6/2017 – Updated dba names for Cargill.
- 1/6/2016 – Removed Springfield facility reference, clarified the supplier approval section, added non-meat ingredient supplier requirements, added section headers, added HACCP recognition date for London and updated the version number.
- 3/11/15 – Updated to show cease of production at the Springfield, MO facility, and removed the security reference to this location.
- 1/11/15 – Updated FDA registration information, clarification of supplier approval program requirements, corrected sentence structure and updated to version 3.

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