January 01, 2022
To: Cargill Customers
Re: Cargill Non-Harvest Raw Processing 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 raw further processing establishments in the United States, Mexico and Canada. The United States Department of Agriculture (USDA) establishments covered by this letter include:

Facility Location	FSIS Establishment #	FDA Registered
Newnan, GA	86G/ P86G	No
Hazelton, PA	86P/P86P	No
Marshall, MO	85M/P85M	No
West Columbia, SC	86A/P86A	No
Milwaukee, WI	20654/P20654	No
Fresno, CA	31913	No
Butler, WI	924A/P5758	No
Fresno, CA	34706	No
Ft. Worth, TX	86F	No
Camp Hill, PA	46700	No
North Kingstown, RI	4725B/P-4725B	No

The Canadian non-harvest raw further processed products establishments covered by this letter maintain 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 the Safe Food for Canadian Regulations (SFCR).

Facility Location	CFIA Establishment #	FDA Registered
Guelph, ON	216	No
Chambly, QB	93B	No
Calgary, AB	700	No
Brampton, ON	146	No
Spruce Grove, AB	146A	No

The Mexican Secretary of Agriculture, Livestock and Rural development SADER/ SENASICA who is responsible to carry out permanent inspection in **TIF** establishments to verify the compliance with the current Good Manufacturing Practices according with the Mexican regulations. The below establishment is being certified as TIF

Facility Location	TIF Establishment #	FDA Registered
Monterrey	722	No

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, CFIA or the SADER/SENASICA 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, CFIA and/or SADER/SENASICA regulations and are operating under a fully implemented Hazard Analysis and Critical Control Points (HACCP) Plan, which meets all requirements set forth in 9 CFR 417 (U.S.) and/or the Safe Food for Canadian Regulations (SFCR) and/or SADER/SENASICA regulations (Mexico). Facilities receiving ground beef

components have supplier requirements in place as outlined below to control exposure potential to *E. coli* O157:H7 and the Non-O157 Shiga Toxin *E. coli* (STEC6). Additionally, facilities have processes in place to monitor for foreign materials and manage processing and storage temperatures. Where finished product sampling occurs at the further processing facilities, a secondary test and hold program is implemented, along with disposition documentation. All Cargill establishments processing products reassess their HACCP plans annually or as their processes change in compliance with the requirements described in 9 CFR 417.4 and/or the FSCR. Additionally, Cargill establishments have in place Sanitation Standard Operating Procedures (SSOPs) that meet all requirements of 9 CFR 416 or the SFCR. Furthermore, Cargill establishments have written supporting programs encompassing:

- Good Hygiene Practices (GHPs)
- Foreign Material Control
- 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 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[1]. At all production establishments, visitors are restricted, except under certain strictly controlled circumstances. Food defense procedures are in place, and Cargill reviews these procedures on a routine 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.
- Labeling / Control of SRM
    - 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.

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

[1] The facility located in Brampton, ON (Est. 146) does not have surrounding fence, however, is access controlled.
[1] The facility located in Newnan, GA (Est. 86G/ P86G) is partially fenced (truck yard, maintenance yard, refrigeration systems), however, is access controlled.

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 specifications and Food Safety/ Quality 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
  - 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 harvest 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. In addition, poultry suppliers shall be compliant with standards set forth by the National Turkey Federation (NTF) Animal Care Guidelines and Best Management Practices or the National Chicken Council (NCC).
- Meat and Poultry 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 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;
  - Facilities shall have interventions to control Specified Risk Materials (SRM's)
  - Facility shall have validated interventions to control *E.coli* O157:H7 and STECs.
  - Microbiological Testing
    - All ground 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 not accept product that tests presumptive positive for *E. coli* O157:H7.

- Intact lot loads must arrive with a Negative result certificate of analysis or product notification document
- Verification Sampling including Shiga Toxin *Escherichia coli* 6 (STEC6) must be completed per our supplier agreements.
- Facility must have an effective "event period" program including actions on subprimals, if appropriate

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, but at the same time, no supplier can 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.

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 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 and no changes needed
1/12/2021 – Added North Kingstown and Camp Hill to location list.
1/1/2021 – Added control of SRM's.
1/1/2020 – added section for our new Mexico location and Mexico regulations.
10/24/19 – Updated CFIA MOP to the SFCR.
1/1/19 – Updated date and updated verbiage under Approved Supplier section.
3/6/18 – Updated FDA Registered facilities
1/2/18 – Clarified supplier 3rd party audits are GFSI or equivalent. Changed "recall" to "retrieval" and updated team names under retrieval point. Added "Product Hold Program" statement. Updated facility Est. numbers to include P86A. Updated Supplier Approval Programs section. Updated format. Added Bioterrorism and FDA registration numbers statement.
1/6/17 – Added 'dba' statement; made grammatical and clarification language updates.
8/22/16 – Added Columbia, SC location and updated version number

1/6/2016 – Updated version, removed Columbus, clarified supplier approval section and added non-meat supplier requirements. Added section headers.