

FDA Enhanced Feed Ban (CMPAF) Statement

Animal Protein North America

Beef, Beef By-Products

Cargill Protein is very cognizant of the concern of the possibility of Bovine Spongiform Encephalopathy (BSE) occurring and has joined others in requiring our suppliers of live cattle to verify that the cattle we purchase from them are in compliance with FDA 21 CFR 589.2000. This is the regulation prohibiting the feeding of mammalian protein to bovines.

The following materials are prohibited in animal feed according to the feed ban:


- The entire carcass of BSE-positive cattle;
- The brains and spinal cord from cattle 30 months of age and older;
- The entire carcass of cattle not inspected and passed for human consumption that are 30 months of age or older from which brains and spinal cord were not removed;
- Tallow that is derived from BSE-positive cattle;
- Tallow that is derived from other materials prohibited by this rule that contains more than 0.15 percent insoluble impurities; and
- Mechanically separated beef that is derived from the materials prohibited by this rule.

The following describes Cargill's US FSIS federally inspected Beef harvest plants process for compliance with 21 CFR 589.2001 *Cattle materials prohibited in animal food or feed to prevent the transmission of bovine spongiform encephalopathy* or commonly referred as the FDA enhanced feed ban rule. The establishments covered by this letter include:

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

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 FDA Food Safety and Modernization Act. Locations manufacturing products that are federally inspected by the USDA FSIS are not required to register.

Cargill US harvest plants, including on-site rendering, do not process animals that have been identified and euthanized for potential central nervous system disorder or do not pass ante-mortem FSIS inspection. Mechanically separated beef is not produced in any facility.



If on plant site, dead or condemned animals in the yards or pens are age verified as over or under 30-months of age by FSIS or trained company personnel. Animals are appropriately marked by age determination to adequately differentiate between over and under 30-months of age. Any dead or condemned animals are either land filled or sent to a specialized renderer.

On the harvest floor, trained technicians perform dentition, based on USDA-FSIS Guidance Materials, to determine carcass age as either ≥ 30 -months or < 30 -months of age¹. The brains and spinal cord from all animals determined as

≥ 30 -months of age are segregated during removal and either land filled, or composted. These materials are not processed through on-site rendering plants. All Cattle Material Prohibited from Animal Feed (CMPAF) materials are collected, stored (if applicable), conveyed, and shipped (or composted) separately from non-CMPAF materials.

For meat & bone meal, the segregation of CMPAF (brains and spinal cord from ≥ 30 -month animals) during the harvest process is monitored for compliance through an internal program. If there is a failure to execute this program, immediate corrective actions are taken to either maintain the integrity of the feed or the finished product is held for final disposition.

For inedible tallow, all finished loads or finished storage tanks are sampled and held pending lab results. If the lab analysis is 0.15% insoluble impurities or less, the load is allowed to ship or the tallow storage tank is used to fill a railcar or truck. If the analysis is $> 0.15\%$ insoluble impurities, the load or storage tank must be reprocessed or held until sold for a non-animal feed use.

This process is verified by plant Food Safety, Quality & Regulatory personnel.

We comply with the USDA-AMS ARC 1036 Procedure, USDA QSA Program Segregation of Cattle Material Prohibited from Animal Feed (S-CMPAF). Cargill facilities covered by this letter² use USDA QSA verification audits to demonstrate conformance. These facilities shipping documents include the following statement as required in the ARC 1036: "Product meets QSA program requirements for CMPAF-free bovine inedible raw materials."

Inedible tallow shipments that may be used in animal feeds or pet foods will be accompanied by a Certificate-of-Analysis from our on-site laboratory indicating compliance of no more than 0.15% insoluble impurities.

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

FSQR Customer Value North America

NA-FSQRInfo@Cargill.com

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