



January 1, 2021
To: Cargill Customers
Re: Pet Treat HARPC Letter

Dear Valued Customer

Thank you for requesting general information regarding the food safety initiatives at the Cargill Meat Solutions Corporation, dba Cargill Protein (hereinafter "Cargill") pet treat establishment. The establishment covered by this letter is:

<u>Facility Location</u>	<u>City, State</u>	<u>FDA Registered</u>
2350 Academy Ave.	Sanger, CA	Yes

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 are not required to register.

Cargill is committed to the safety and quality of our products. The Pet Treat establishment is in compliance with FDA regulations and is operating under a fully implemented plan which meets requirements set forth in FDA FSMA regulations regarding Hazard Analysis and Risk Based Preventive Controls (HARPC) set forth in 21 CFR 500.35.

The establishment does consider *Salmonella* as a "hazard reasonably likely to occur" in the HARPC plan, therefore Preventive Controls have been established to mitigate this risk. This control is achieved through validated cook parameters meeting FSIS Appendix A (Compliance guidelines for meeting lethality performance standards for certain meat and poultry products.). All Preventive Controls (PC) critical limits are monitored for each lot of product produced. Additionally, the establishment has multiple steps to control the risk of *Salmonella* in pet treat products including but not limited to; raw processing controls and thermal treatment. The establishment also performs microbiological tests on environment and finished products that serve as verification that the system is functioning as designed. Monitoring results are evaluated on an ongoing basis for trend analysis of the establishment and products. Furthermore, the Cargill Pet Treat establishment has supporting written programs encompassing:

- Good Hygiene Program (GHP)
- Foreign Material Controls
- Retrieval and traceability procedure to ensure proper identification for all products coming into/through 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 approved External Manufacturers.
- Pest Control Program
- Product Hold Program
- Food Defense Program
 - Establishment is access controlled and fenced. At the production establishment, visitors are restricted, except under certain strictly controlled circumstances. Food defense procedures are in place and Cargill reviews these procedures on a routine basis.

Contact

Cargill Protein Group
Techsvs_Requests@cargill.com

<https://www.cargill.com/meat-poultry/meat-food-safety>
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- Quality testing for water activity (Aw)
- Environmental Sampling utilizing 3rd party accredited laboratories for microbiological analysis.
- All labels meet AAFCO guidelines.

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

Cargill has prerequisite programs as a foundation enabling our HARPC systems to function more effectively. Since our facilities do not continuously monitor the harvest process of all raw products received into the facilities, we rely on programs such as our Raw Material Supplier Programs to help mitigate possible chemical hazards. The Raw Material 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:

- Food Safety System
 - Raw meat and bone materials are purchased from USDA inspected facilities operating under a Pathogen Reduction/Hazard Analysis and Critical Control Point (HACCP) program.
- Sanitation, Pre-requisites and Training
 - Supplier facilities must have implemented written Sanitation, Pre-requisite and training programs sufficient to ensure that all processing and handling equipment that contacts the ingredients are cleaned and sanitized properly.
- Raw Meat and Bone Materials
 - Suppliers must have programs that:
 - Exclude non-ambulatory disabled livestock as defined by FSIS 6900.1, Revision 1.
 - Are in compliance with FSIS Notice 56-07, Final Regulations for Non-Ambulatory Disabled Cattle and Specified Risk Materials (SRMs).
 - Require all animals be handled in a manner compliant with the current “Recommended Animal Handling Guidelines and Audit Guide”. Published by 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).

Food Safety System Audits

Cargill Pet Treat facility in Sanger, California has obtained certification under an approved Global Food Safety Initiative (GFSI) standard for Food Safety and Quality.

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 products. Accordingly, we want to reiterate the importance of proper handling 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 <https://www.cargill.com/meat-poultry/feed-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.

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Vice President Food Safety, Quality & Regulatory
Cargill Protein Group



Revision History:

1/1/2021 – updated FDA Registration dates.

1/1/2020 – Updated validation for statement.

1/1/2019 – Updated FDA registration dates

1/2/2018 – Added GFSI certification to audit section. Updated web address and added email address for additional information. Updated HACCP to HARPC to match FSMA language. Added statement for control of Salmonella. Changed “recall” to “retrieval” and updated team names under retrieval point. Updated Approved Supplier Programs section. Changed format.

7/22/2015 – Initial letter

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