



January 7, 2020
 To: Cargill Customers
 Re: Safe Feed for Animals 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”) facilities producing ingredients intended for use in feed. The following facilities are inspected and verified by the Food and Drug Administration (FDA). The Cargill facilities covered by this letter include:

<u>Facility Location</u>	<u>City, State</u>	<u>FDA Registered</u>
1530 US Highway 60	Friona, TX	Yes
3201 E. Trail Street	Dodge City, KS	Yes
490 Road 9	Schuyler, NE	Yes
1505 E. Burlington Ave.	Fort Morgan, CO	Yes
1252 Route 706	Wyalusing, PA	Yes
3115 S. Fig Ave.	Fresno, CA	Yes
2621 Eugenia St.	Nashville, TN	Yes
3709 E. First St.	Fort Worth, TX	Yes
1529 23 rd St. East	Columbus, NE	Yes

Canadian facilities have similar programs to those in the U.S. The following facilities are inspected and verified by Canadian Food Inspection Agency (CFIA). These facilities meet or exceed the requirements of the CFIA, as well as import requirements:

<u>Facility Location</u>	<u>City, State</u>	<u>CFIA Registered</u>
472 Ave & Highway 2A North	High River, AB	Yes
162 Dunlop Drive	Guelph, ON	Yes

With regard to Cargill’s Food and Drug Administration (FDA) Facility Registrations, Cargill’s facility registrations were renewed on or before December 31, 2018 and are in effect through December 31, 2020. 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.

The product categories¹ covered by this letter include:

- Edible and Inedible Bones
- Rendered Products including but not limited to:
 - Gel Bone²
 - Dried Blood
 - Blood Plasma
 - Meat & Bone Meal
 - Technical Tallow
 - Inedible Tallow
- Denatured/Wet Organs
- Hides/Skins used for gelatin
- Grease

¹ Not all product categories are produced at each facility location.

² Gel Bone products are collected from edible processes and do not include skulls. Gel Bone is also known as degreased Bone Chips

Contact

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<https://www.cargill.com/meat-poultry/meat-food-safety>
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General Food Safety Programs

Cargill is committed to the safety and quality of our products. All Cargill rendering facilities covered by this letter process products that are in compliance with all applicable FDA³ regulations and/or Canadian Food Inspection Agency (CFIA) and are operating under a fully implemented Hazard Analysis Risk Based Preventative Control (HARPC) Plans. Facilities that process Meat and Bone meal are utilizing validated cooking temperatures⁴ for the reduction of potential pathogenic hazards. Facilities that process tallow maintain temperatures⁵ sufficient to control the growth of *Salmonella* spp. Furthermore, Cargill facilities have in place supporting written programs encompassing:

- Good Hygiene Practices (GHPs)
- Sanitation Program
 - Cargill meets the requirements as outlined in 21 CFR 507.19.
- 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 establishment such that if necessary, all products that are produced can be traced by product codes and/or volumes and or timeframe shipped to the first level of distribution. Each of our production businesses 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 on a minimum of annually to ensure effectiveness in the ability to trace all products and ensure all team members are competent in their roles.
 - Facilities meet the documentation requirements as outlined in 21 CFR 589.2000 and CFIA Health of Animals regulations section 165.
- Non-Conforming product control programs
- Pest Control Program
- Food Defense Program
 - Facilities are access controlled, fenced and/or guarded. At all production facilities, visitors are restricted, except under certain strictly controlled circumstances.
- Supplier Verification
 - Only materials of animals harvested from federally inspected facilities with ante mortem inspection are utilized in Cargill processes. Suppliers of beef materials within the United States and Canada are single source harvest facilities. Beef materials purchased from outside the US and Canada have appropriate segregation plans.
 - Only materials from approved vendors are utilized.
- Contaminants Assessment
 - All facilities have reviewed current programs and processing materials and determined the common chemical contaminants listed below are not inherent to the products produced at Cargill facilities.
 - Mycotoxins/ Vomitoxins
 - Heavy Metals
 - Pesticides/ Herbicides
 - Dioxins
 - PCB's
 - Fertilizers
 - Radionuclides
 - Euthanizing drugs
 - Thyroid Glands may be present in gullet and/or meat and bone meal. Thermal degradation of L- Thyroxin (T₄) occurs at temperatures above 120°C, with the disappearance of thyro-toxic

³ Edible products meets USDA FSIS 9 CFR 417

⁴ The facilities that process meat and bone meal will process product to a minimum of 260°F (126.6°C) for a minimum of 128 seconds.

⁵ The facilities that process tallow will maintain product temperature of minimum product temperature of 160°F (71.1°C).

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potential. Therefore, the levels of thyroxin necessary to cause thyrotoxicosis would not likely be in the meat and bone meal and tallow products produced at Cargill.

- Biological contaminants that may be inherent to the product or processes have been evaluated and addressed accordingly within the hazard assessment. Dry meal products and denatured/wet organs are only intended for use in processes with additional lethality process steps.
- Facilities utilize metal control programs as part of their foreign material controls.
- Transportation
 - Transportation vehicles contracted by Cargill shall be in compliant with Cargill's transportation policy.
 - Transportation vehicles are inspected prior to loading.
 - Seals on all loads
 - Cargill does not conduct multiple drops on bulk loads.

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 CFIA MOP Chapter 17, Annex D. All SRMs are segregated from human food and discarded to inedible rendering, incinerated or landfilled (these are general practices, we shall follow country specific requirements):

- Dead/Downer stock is not processed into rendered materials at Cargill facilities.
- Carcasses are segregated according to age based on the guidelines presented in FSIS-2007-0015 or CFIA MOP Chapter 17, Annex D. to ensure proper disposal of SRMs from cattle 30 months or older.
- The skull including brains, eyes and trigeminal ganglia are sent to landfill from all cattle 30 months and older.
- The vertebral column of cattle aged 30 months and older is removed during fabrication and discarded to inedible.
- Eighty inches of small intestines, including the distal ileum, as measured from the ileocecal junction is removed and rendered.
- No air injection stunning is used.

3rd Party Audits

Cargill Canadian Rendering facilities are operating under Animal Protein Producers Industry (APPI) code of practice (COP). All Cargill U.S. Beef Rendering facilities are currently operating under certification against the Safe Food Safe Feed updated code of practices.

Animal Welfare

Cargill feed ingredients source from suppliers that are committed to meeting all applicable regulations that pertain to animal handling and the proper care of animals as regulated by the USDA and/or CFIA Animal Welfare regulations, as well as the current North American Meat Institute (NAMI) Good Management Practices for Animal Handling. Suppliers provide 3rd party audits or other information to confirm this commitment.

Residue Testing

Cargill does not use uninspected animals to manufacture hides or animal feed ingredients. All Cargill Protein Group facilities are federally inspected by trained FSIS/USDA or CFIA veterinarians, which inspect and test carcasses for chemical residues as prescribed. Cargill does not process carcasses that test positive for residue violation in our rendering facilities.

Country of Origin Statement

The animal based materials utilized within the rendering facilities at Cargill facilities primarily originate from animals born and raised in the United States, Mexico, Canada, Australia or New Zealand. However, since cattle are not typically an integrated system, Cargill cannot guarantee cattle are exclusively born or raised in these countries. Cargill does not have direct ship to most Cargill facilities and requires all cattle to be on the soil of country of harvests a minimum of 100 days prior to processing, with the exception of the Wyalusing, PA facility may receive cattle via direct ship from Canada.

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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. However, if you have specific Country of Origin needs or requirements, please contact your Cargill representative for further discussion.

Natural Claims

Cargill's raw harvested products used in feed applications meet the following AAFCO definition;

“A feed or ingredient derived solely from plant, animal or mined sources, either in its unprocessed state or having been subject to physical processing, heat processing, rendering, purification, extraction, hydrolysis, enzymolysis or fermentation, but not having been produced by or subject to a chemically synthetic process and not containing any additives or processing aids that are chemically synthetic except in amounts as might occur unavoidable in good manufacturing practices.”

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. In addition, Cargill notes that claims made on meat and poultry products for human food must be approved through the Food Safety Inspection Services (FSIS) per 9 CFR 412.1(c)(3).

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 lethality treatment 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 <https://www.cargill.com/meat-poultry/feed-safety>. However, should you have any specific questions please contact our office at 316-291-2500 or 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:

1/1/2020 – Added footnote in Country of Origin section for the Wyalusing PA facility.

1/2/2019 – Added the Natural Claims section and updated FDA registration dates. Added euthanasia drugs under Contaminants Assessment.

5/15/2018 – Updated 3rd party audit section to show all US Rendering facilities are SFSF certified.

3/22/2018 – Added clarifying comment in SRM section “(these are general practices, we shall follow country specific requirements):”

1/2/2018 – Changed format. Add Techsvs_request@cargill.com email for further questions. Updated Country or Origin section. Changed “Recall” to “Retrieval” and updated team members in Retrieval team. Added footnote “Edible products meets USDA FSIS 9 CFR 417”. Updated product categories. Added statement about FDA Bioterrorism.

8/16/2017 – Added SRM statement, included dead stock statement, modified to make clarifications regarding processing parameters.

10/28/16 – Added footnote of lethality minimums for meat and bone meal.

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