



HARPC Statement

Animal Protein North America

Human Grade Pet Food

Thank you for requesting general information regarding specific initiatives at Cargill's Human Grade Pet Food Facilities. The facilities covered by this letter are:

<u>Facility Location</u>	<u>FSIS Establishment #</u>	<u>FDA Registered</u>
Albert Lea, MN	2133 / P-29	Yes
Fort Worth, TX	21171 / P-21171	Yes

Cargill's Food and Drug Administration (FDA) facility registrations are renewed on or before December 31, 2024, and in effect through December 31, 2026. Registration numbers are considered confidential as FDA does not release them publicly or provide a public facing database of registered facilities; therefore, Cargill does not disclose that information. 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.

Human Grade Statement

Cargill follows the Association of American Feed Control Officials (AAFCO) definition of "Human Grade", as included in AAFCO's 2020 Official Publication. Cargill confirms that the Human Grade Pet Food produced at the above facilities is:

1. Stored, handled, processed, and transported in compliance with current good manufacturing practices for human food as specified in 21 CFR Part 117;
2. Produced at a manufacturing facility which is licensed to produce human food by the appropriate authority.
3. Processed to utilize AAFCO's standard and the US Department of Agriculture's (USDA) Agriculture Marketing Service (AMS) Process Verified Program (PVP) to validate human grade labeling claims.
4. All ingredients used are fit for human consumption. Cargill's Supplier and External Manufacturer Program ensures all ingredients are fit for human consumption.

Cargill makes no representation or warranties as to whether the finished product would be appropriate nutritionally for human consumption.


Food Safety Programs

Cargill is committed to the safety and quality of our products. The Human Grade Pet Food facilities are in compliance with FDA regulations and are 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 Part 117. The HARPC also considers the handling of pet food by humans per 21 CFR

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507.33(d)(8).


Per Compliance Policy Guide (CPG) Sec 690.800 “*Salmonella* in Food for Animals”, the facilities covered by this letter consider *Salmonella* as a ‘hazard reasonably likely to occur’ in the HARPC plan, therefore Preventive Controls (PC) 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 PC critical limits are monitored for each lot of product produced. Additionally, each facility has multiple steps to control the risk of *Salmonella* in pet food products including but not limited to: raw processing controls and thermal treatment.

In addition, the facilities also perform 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 facilities and products. Furthermore, the Cargill facilities have 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.
- Pest Control Program
- Product Hold Program
- Food Defense Program
 - Facilities are access controlled and fenced. At the production facilities, 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.
- Environmental Sampling utilizing 3rd party accredited laboratories for microbiological analysis.
- Labeling Review Program.
- Sanitary Transportation Rule.

Supplier and External Manufacturer (SEM) Program

Cargill is committed to providing safe, regulatory compliant, and high-quality products. This is a responsibility that we share with our supply chain partners and are dedicated with developing sustainable relationships to support our customers with their mission



Cargill has established global human and animal food processes and standards to protect the integrity of all our products. Our supplier qualification process ensures materials procured are manufactured in accordance with all regulations applicable for countries of operation and distribution. In summary, the qualification process includes:

- A review of production source and geography to determine potential risks
- At minimum, review the summary of the manufacturing facility's Hazard Analysis Critical Control Point (HACCP), Hazard Analysis and Risk-Based Preventive Controls (HARPC) plan or other relevant food safety plan to ensure associated risks are identified and adequately addressed
- Verification of eligibility to import
- Product labeling to review compliance with regulations
- Review of manufacturing facility's 3rd Party Global Food Safety Initiative (GFSI) audit report
- Review of material category specific certification (e.g. BAP, GAP, BQA)
- Agreed upon material specifications
- A signed agreement attesting to a continuing guarantee.

An annual reassessment is conducted to ensure the manufacturing facility continues to meet program requirements and updated audit documentation is obtained, then reviewed for acceptability. Cargill also utilizes a nonconformity management system to track, trend, and provide continuous feedback to our supply partners. This process drives continuous improvement in our suppliers, as well as our systems.
(<https://www.cargill.com/doc/1432115454033/sem-requirements-manual-version-3-en-pdf.pdf>)

3rd Party Audits

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

Revision History:

1/1/2025 – Updated registration dates. Added AAFFCO PVP - human grade claim.
1/1/2024 – Reviewed, no changes needed.
1/1/2023 – Updated registration dates
1/1/2022 – Reviewed, no updates needed
1/1/2021 – Updated FDA Registration dates
7/30/2020 – Initial letter

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

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