



USDA Modernization of Egg Products Inspection

Cargill Protein - Eggs

Dear Valued Customer,

On September 9th, 2020, the U.S. Department of Agriculture (USDA) Food Safety Inspection Service (FSIS) released an advance publication of the Egg Products Inspection Regulations. The final rule aligns the egg products regulations with current requirements in the meat and poultry inspection regulations.

Currently our Cargill Protein - Eggs locations in the United States manufacture egg products under continuous inspection of USDA FSIS under the Egg Products Inspection Act (EPIA) published in 1970. We meet or exceed all the requirements set forth by the EPIA and will continue to do as we transition to the new regulatory requirements.

We also manufacture cooked egg products containing meat or poultry products under the jurisdiction of USDA FSIS. Cargill has a deep knowledge of these regulatory requirements that will be implemented as part of this transition.

The final rule will have a staged implementation with different compliance timelines. The first part will be effective 60 days after the publication to the Federal Register, with other portions of the regulation effective 1 year and 2 years after its publication.

We do not anticipate any significant changes to our Food Safety Management Systems, as the changes reflected in the Egg Products Inspection Regulation have been implemented across our facilities since 1990. Similarly, we do not anticipate any major process interruptions due to these regulatory changes. In short, we are well prepared for this change.

Our Food Safety Management System is comprised of Pre-Requisite Programs (PRPs) and Hazard Analysis Critical Control Points (HACCP). PRPs are the foundation of our food safety management system and address: Construction and Layout of Buildings; Layout of Premises and Workspace; Utilities - Air, Water, Energy; Waste Disposal; Equipment Suitability, Cleaning and Maintenance; Management of Purchased Materials; Measures for Prevention of Cross Contamination; Cleaning and Sanitizing; Pest Control; Personnel Hygiene and Employee Facilities; Rework; Product Recall Procedures; Warehousing; Product Information and Consumer Awareness; Food Defense, Bio-vigilance and Bioterrorism. PRPs are monitored and verified for compliance to requirements.

PRPs support a formal science-based HACCP program tailored to each process and led by dedicated food safety coordinators at each plant in conjunction with the plant food safety committee. Each HACCP plan evaluates the likelihood and severity that a hazard will occur. Hazards types are categorized as biological (*Salmonella* spp., *Listeria monocytogenes*), chemical (chemical residue, allergens), and physical (foreign objects).

As part of HACCP verification, a test and hold policy is in place for finished products undergoing microbiological testing for targeted pathogens.

Training is a key element for all our processes and is essential to ensure all stakeholders understand the requirements and why they are important to our customer. All required stakeholders will receive documented training on the updated requirements as they are implemented.

Cargill Protein - Eggs will continue to use state-of-the-art Food Safety Systems and is committed to the production of safe, high quality food for our customers. Please feel free to contact me with any further questions or concerns.

Sincerely,



Contact

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