HACCP Statement

Animal Protein
Alternative Protein

North America

Poultry

Thank you for requesting general information regarding specific initiatives at Cargill poultry product establishments in the US and Canada. Our facilities are integrated processes that harvest animals raised under Cargill's strict policies and requirements. The USDA Establishments covered by this letter include:

Facility Location	Establishment #	FDA Registered
California, MO	Est. P-961	No
Dayton, VA	Est. P-18	Yes
Springdale, AR	Est. P-963	Yes

The Canadian poultry harvest establishment covered by this letter maintains Canadian Food Inspection Agency's (CFIA) Food Safety Enhancement Program (FSEP), which has been recognized as similar and equivalent to USDA requirements. The establishment is federally registered and HACCP recognized.

Facility Location	Establishment #	FDA Registered
London, ON	Est. 470	No

With regard to Cargill's Food and Drug Administration (FDA) Facility Registrations, Cargill's facility registrations were renewed on or before December 31, 2022 and are in effect through December 31, 2024. 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.

General Food Safety Programs

Cargill is committed to the safety and quality of our products. All Cargill poultry harvest establishments are in compliance with all U.S. Department of Agriculture (USDA) or CFIA regulations and are operating under a fully implemented Hazard Analysis and Critical Control Points (HACCP) Plan, which meets all requirements set forth in 9 CFR 417 and/or the Safe Food for Canadian Regulations (SFCR). Cargill has identified validated Critical Control Points (CCP) for the process and monitor each at a minimum of each production day. The CCPs are validated by scientific research and internal monitoring. Cargill poultry harvest establishments in the US are in compliance with all USDA/FSIS requirements, and subject to *Salmonella* and *Campylobacter* Performance Standards. Cargill is currently operating in accordance with 9 CFR 381, consistent with the provisions of the Modernization of Poultry Slaughter Inspection Final Rule.

Cargill establishments have in place Sanitation Standard Operating Procedures (SSOPs) that meet all requirements of 9 CFR 416 or the Safe Food for Canadians Regulations (SFCR).   Furthermore, Cargill establishments have in place written supporting programs encompassing

- Good Hygiene Practices (GHPs)
- Foreign Material Control
- Retrieval and traceability procedure to ensure proper identification for all materials coming into/through the system and leaving the system.
    - o 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.
    - o In the event of a natural disaster or other crisis situation that renders a production facility inoperable, Cargill has production contingency plans that involve other Cargill facilities, as well as approved External Manufacturers.
- Pest Control Program
- Product Hold Program
    - o Ground turkey is tested for *Salmonella*, and known products that are above the threshold limit are diverted. This process has shown to reduce levels of *Salmonella* with a positive public health impact.
    - o This process has been reviewed by the USDA.
- Food Defense Program
    - o Establishments are access controlled, fenced and guarded. At all production establishments, visitors are restricted, except under certain strictly controlled circumstances. Food defense procedures have been in place for some time, and Cargill reviews these procedures on a regular basis.
- Allergen Control Program.
    - o 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.
    - o Additionally, all established allergen programs are a part of internal audits and annual third party GFSI certified audits.

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

Cargill has prerequisite programs as a foundation enabling our HACCP systems to function more effectively. Since our facilities do not continuously monitor the manufacturing processes of all materials received into the facilities, we rely on programs such as our Supplier Programs to help mitigate possible biological, chemical and physical hazards. The Supplier Programs provide the mechanisms by which we ensure supplier compliance with our Food Safety/ Quality and specifications 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:

- HACCP
    - Raw poultry purchased from the United States or Canada come from USDA/CFIA inspected facilities operating under a HACCP program.
    - Suppliers must have adequate segregation programs, if handling multiple species in one location, to ensure there is no risk of substitution and the labeled species is accurate.
    - Suppliers are required to have a program for testing for residues within their process.
- SSOPs, Pre-requisites and Training
    - Poultry supplier facilities must have implemented written SSOPs/Pre-requisite and training programs sufficient to ensure that all processing and handling equipment that contacts the poultry is cleaned and sanitized properly and that sanitation effectiveness is monitored during pre-operational inspection.
- Live Animal Handling
    - Are in compliance with FSIS Directive 6100.3 Ante-Mortem and Post-Mortem Poultry Inspection or the Safe Food for Canadian Regulations.
    - Require all animals be handled in a manner compliant with the current standards set forth by the National Turkey Federation (NTF) Animal Care Guidelines and Best Management Practices and the National Chicken Council (NCC).
    - As applicable, must have conducted an animal handling audit by a PAACO trained auditor annually.
- Audits
    - Poultry supplier facilities must schedule, conduct and maintain certification against a Global Food Safety Initiative (GFSI) certification or equivalent audit.
    - Ingredient suppliers must have an annual 3rd party GFSI or equivalent audit for each facility supplying Cargill. Additionally, must complete an allergen assessment and provide a specification for each product supplied to Cargill.

Animal Welfare

Cargill is committed to meeting all applicable federal regulations that pertain to animal handling and the proper care of animals, as well as the current National Turkey Federation (NTF) Animal Care Guidelines or National Chicken Council (NCC) Animal Handling Guidelines. The following information is provided to you to demonstrate our commitment to Animal Welfare:

- Cargill has training programs in place specifically designed to address animal handling procedures.
- Industry experts have been used to design equipment and review the animal handling and harvest process.
- Cargill completes daily monitoring audits to ensure animal handling requirements are met.
- An independent 3rd party Professional Animal Auditor Certification Organization (PAACO) trained auditor completes yearly audits. This confirms compliance with the NTF Animal Care Guidelines or NCC Animal Handling guidelines from the Hatchery to Harvest.
- Cargill is a registered participant in the National Poultry Improvement Plan (NPIP) and is testing birds for Avian Influenza according to this plan.

Audits

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

Export

To ensure all products meet or exceed the standards set for export into other countries, Cargill specifies certain products and produces them under the standards set forth for export into those countries. All products should be verified to be eligible for export* to that country prior to producing the finished product for export. All products are adequately labeled to provide the necessary required information to complete Form 9060-6 for export from the US or CFIA Meat Hygiene MOP Chapter 11.

Residue Testing

All US Cargill establishments are federally inspected by trained FSIS/USDA veterinarians, which inspect and test suspect carcasses for chemical residues. Cargill has an internal screening program of live poultry for pesticides. All birds of the sampled house are retained until sample results are returned and found to be acceptable. Additionally, there are programs in place to control drug issuance and withdrawal periods for each flock.

Cargill believes our food safety program sets the standard for the industry, but at the same time, no supplier can guarantee pathogen free raw materials. Accordingly, we want to reiterate the importance of proper handling and cooking of all raw products by you and your customers. Cargill commits to ensure prompt updates to our documents upon any changes to our procedures or processes.

References:

- USDA Export Checklist http://origin-www.fsis.usda.gov/regulations_&_policies/Export_Checklist/index.asp
- CFIA Export Chapter 11 http://www.inspection.gc.ca/english/fssa/meavia/man/ch11/11.1-6e.shtml

Revision History:
1/1/2024 – Reviewed, no changes needed.
1/1/2023 – Updated registration dates
11/17/2022 Updated to the Thrive Template
1/1/2022 – Added link to Supplier Approval Program
1/1/2021 – Updated FDA Registration Dates
10/30/2020 – remove statement about birds are born and raised in the same country as harvested.
1/1/2020 – Added note state Waco stopped harvesting turkeys in November 2019.
10/7/19 – updated FDA location to include Dayton
3/1/219 – Updated Canadian Regulations reference from MOP to SFCR
1/1/2019 – Updated FDA facility registration date.
3/6/18 – Updated FDA Registered facilities
1/2/2018 – Changed *Salmonella* Performance Standards, to *Salmonella* and *Campylobacter* Performance Standards. Updated Residue testing section. Changed "recall" to "retrieval" and updated team names in retrieval point. Added Product Hold and Segregation Program point. Updated Approval Supplier Programs Section. Added Bioterrorism and FDA registration numbers statement.
1/6/17 – updated dba statement
1/6/16 – Added Supplier approval section, moved NPIP statement, removed country of origin statement, and included *campylobacter* control statement.
1/12/15 - Updated to version 6.

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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