Smithfield™
Beef Group

Statement of Compliance with Federal Register Interim Final Rules Regarding:

Prohibition of the Use of Specified Risk Materials in Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Animals;

Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems; and

Prohibition of the Use of Certain Stunning Devices Used To Immobilize Cattle During Slaughter.

January 11, 2007

This letter is to notify you and your company that all Smithfield Beef Group Facilities (listed below) have implemented programs in order to comply with The United States Department of Agriculture's (USDA) Food Safety Inspection Service's (FSIS) recent Interim Final Rules published in the Federal Register on January 12, 2004. More specifically, outlined below are the steps our company has taken over the past several years to address the risk of Bovine Spongiform Encephalopathy (BSE).

- Since 1997 Smithfield Beef Group has required a "Livestock Owner Certificate" stating that, to the best of the owner's knowledge, none of the livestock purchased by Smithfield Beef Group, are adulterated within the meaning of the Federal Food, Drug, and Cosmetic Act [§21CFR589.2000] (i.e., none of the cattle or other ruminants have been fed any feed containing protein derived from mammalian tissues).

- Smithfield Beef Group's downer or non-ambulatory animal policy states that any animal(s) **not** capable of movement under their own power **will not** be presented for antemortem inspection and said animal(s) will be disposed of properly to ensure that no part of the animal(s) will enter the human food supply. We also work in full cooperation with FSIS to ensure that we are in compliance with all applicable regulations regarding the humane treatment and proper disposition of non-ambulatory livestock should they become disabled after antemortem inspection.

- Smithfield Beef Group's policy concerning animal(s) to be tested for Bovine Spongiform Encephalopathy (BSE) states that any animal(s) that is (are) to be tested for BSE will be completely and properly disposed of (disposal in a landfill or by incineration) so to ensure that no products from the tested animal(s) enter the human food or rendered product supply.

- Smithfield Beef Group's policy in place to segregate specified risk materials (SRMs) from human food require that:
    - The spinal cords, tonsils, and distal ileum of all cattle, regardless of age, will be removed during harvest and made inedible to prevent subsequent contact between the SRM and any edible meat products,
    - The skulls of cattle, regardless of age, including the brain, trigeminal ganglia, eyes and tonsils will be removed during harvest and made inedible to prevent subsequent contact between the SRM head and any edible meat products,
    - In order to ensure complete removal of the dorsal root ganglia, the vertebral column of cattle aged 30 months or older (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) will be removed from the carcass during fabrication and disposed of as inedible product.

- Smithfield Beef Group's policy to determine the age of cattle that do not have some form of age identification presented with the animal at the time of slaughter is based on the dentition guidelines provided by FSIS in Notice 5-04 (January 12, 2004). All cattle determined to be 30 months of age or over are identified and segregated to ensure proper disposal of their associated SRM's.

- All bone in products shipped by our facilities containing any part of the vertebral column that has been identified as an SRM in cattle 30 months of age or older are subject to the above controls and therefore are derived from cattle less than 30 months of age.

- Verification procedures, utilizing periodic process audits, have been established to ensure the proper implementation of the above policies.

- Smithfield Beef Group made the decision to remove all advanced meat recovery (AMR) systems from all facilities in December of 2002; the final system was removed from production in March of 2003 and we no longer produce AMR products. In addition we do not utilize AMR as raw material in the production of our ground products.

- As per §9CFR 313.15(b)(2)(ii) the use of captive bolt stunners that deliberately inject compressed air (air injection stunning) into the cranium at the end of a penetration cycle are not used to stun cattle in our facilities.

- Smithfield Beef Group has developed a "BSE CRISIS PLAN" that describes in detail, key background information on the disease, current BSE prevention strategies, current Smithfield Beef Group firewalls, future Smithfield Beef Group firewalls, best practices for removal and disposition of Specified Risk Materials, post-positive diagnostics, a crisis communication plan, and mock crisis activities.

We hope that you find this information useful in reassessing your programs with regard to the above mentioned regulations. Please feel free to contact the Food Safety Manager at the respective facility from which you purchase products or me if you have any further questions regarding this matter.

Respectfully,

Steve VanLannen
Vice President of General Managers, and
Technical Services-Food Safety, Microbiology and
Quality Assurance
Smithfield Beef Group.
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Plant	Location	Est. #
Packerland Packing Company	Green Bay, WI	EST 562 & 562B
Packerland Plainwell	Plainwell, MI	EST 562M
Moyer Packing Company	Souderton, PA	EST 1311
Sun Land Beef Company	Tolleson, AZ	EST 267