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April 25, 2005

Jim Davis Gurrentz International Corp. FAX: 760-782-0362

Dear Mr. Davis:

Thank you for your inquiry regarding the Swift & Company policy for humane handling of animals. For us, proper and humane treatment of animals is a standard operating procedure, not just because it makes sense economically but because it is the right thing to do.

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Our humane handling program was designed and is continually evaluated by world-renowned animal handling specialist Dr. Temple Grandin of Colorado State University. Although Swift & Company has long operated in compliance with the federal Humane Slaughter Act, our work with Dr. Grandin has assisted us in making additional upgrades to both facilities and employee training programs that exceed federal requirements and further enhance the welfare of our animals. The result is a system of which we are proud.

We begin with an attention to detail in our facilities. The removal of small structural distractions, use of non-slip flooring, and elimination of sharp edges in chutes and pens all contribute to ease of movement and calmness. Use of "paddle sticks" and flags assist movement, and employees are instructed to limit yelling and use electrical prods only as a last resort.

Beyond these basic facility standards and initial handling guidelines, Swift & Company's policy is spelled out in a formal Standard Operating Procedure (SOP). That procedure has three primary elements: 1) minimization of animal vocalization from the squeeze pen through the stunning box, 2) testing procedures to ensure complete animal insensitivity, and 3) operational guidelines to reduce the incidence of re-stunning.

All Swift & Company employees who handle live animals are trained in these three SOP elements in order to become Certified Animal Handlers. In accordance with our SOP, humane handling procedures are audited daily by operations personnel, and weekly at random by quality assurance personnel. We have a zero-tolerance policy for sensitive animals beyond the stunning box, and any failure to comply with the SOP is addressed at the supervisor level.

Swift & Company also goes beyond the on-site premise with its humane handling. Transporters are required to acknowledge in writing the humane handling parameters that they must adhere to for proper delivery of livestock. This requires in addition to adherence to FSIS Directive 6900.2, the use of "Electrical Prods" is prohibited, whip or paddle use should be limited, livestock should not be hurried to cause bruising, slips or falls, downer cattle are not allowed and trailers are to be maintained in a sanitary manner to minimize cross contamination. Swine transporters are trained in proper handling practices through their participation in the National Pork Board's Truckers' Quality Assurance training, which is provided at our plants.

As a company, we know we are obligated to treat our animals humanely. We fulfill that obligation through rigorous training and oversight, and are pleased to provide wholesome beef and pork products that have been produced under these strict guidelines. I hope this information is helpful to you, and appreciate your interest in the well being of animals handled at Swift & Company.

Sincerely,

Warren Mirtsching

Vice President, Food Safety & Quality Assurance