



May 19, 2008

The Honorable John D. Dingell
Chairman
Committee on Energy & Commerce
U.S. House of Representatives
Washington, DC 20515-6115

The Honorable Bart Stupak
Chairman
Subcommittee on Oversight & Investigations
U.S. House of Representatives
Washington, DC 20515-6115

Dear Chairman Dingell and Chairman Stupak:

In response to your May 8, 2008 correspondence to the Wm. Wrigley Jr. Company, we have reviewed all International and US records in our possession to respond to your questions regarding food products produced or sold in the US. As our records retention plan calls for the routine destruction of some of these documents during the relevant time period, we have provided our responses based on actual data available during the relevant time period.

As you may know, our business is limited to the manufacture of gum and confectionery products, which are compositionally stable. Ingredients used in our products include alditols, high intensity sweeteners, bulk sweeteners, gum base and flavors. These materials have a low inherent microbial risk due to a combination of the following factors: low water activity and bacteriostatic activity of flavors and antioxidants, as well as the process temperature and mechanical shear involved in the manufacture of gum base. Wrigley routinely tests incoming materials for target microorganisms and our experience has been that our supply meets material requirements, specifications and applicable regulations. Microbiological testing data generated by Wrigley at our laboratories here in Chicago shows that Wrigley finished gum, chewy candy, mints and hard boiled sugar candy are microbiologically stable due to inherent product formulation characteristics and the products' low water activity.

Wrigley tests materials for known chemical contaminants based on the risk factors inherent in material sourcing and/or processing systems. Chemical contamination testing also is an element of our supplier quality program, and our suppliers are required to meet Wrigley's material specifications with respect to a component's composition and any chemical contaminants. Our specifications are derived from scientific guidance provided by the Codex Alimentarius Commission and the US Food and Drug Administration.

Wrigley responses to the specific questions you have presented are as follows:

1. Wrigley has never had to conduct a food recall or food safety alert. Our strict quality standards have ensured food safety and overall product quality. Our company has always been focused on delighting our customers through premium quality products.

2. As stated above, our products are inherently microbiologically stable, and we therefore do not routinely test them for pathogens. We have however tested our products for indicator microorganisms using external laboratories and to our knowledge have had no positive results for pathogens to date.
3. Based solely on available records, Wrigley has conducted over 200 analyses on finished products for chemical contaminants during the relevant time period. This testing is mainly metals analysis (e.g., arsenic, cadmium, iron, lead, mercury, tin, copper, antimony, etc.), and none of these tests have resulted in a positive result exceeding FDA guidelines.
4. We do not have any instances of positive results for either microbial or chemical contaminants testing from internal or external laboratories based on our records review here at Wrigley Global Analytical labs and at Cafosa, a subsidiary of Wrigley acquired in 2003, whose main import is gum base ingredient used in the manufacture of our products.

Our material suppliers are obligated to meet US requirements regarding chemical and/or microbial contamination. Wrigley requires suppliers to meet these requirements through material specification compliance. Our supplier quality management system requests qualification of the supplier site through third party audit testing and material functional attribute testing. Wrigley has not been notified by our suppliers of any positive results to date.

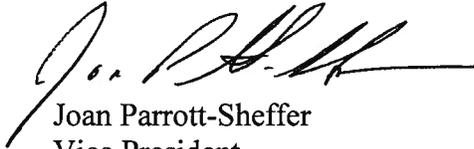
5. As detailed above, Wrigley to date has not encountered circumstances requiring FDA notification. However, should such situation arise in the future, Wrigley would proactively notify the FDA and manage the situation to ensure consumer safety.
6. Wrigley internal procedures require facility management to contact the Global Quality organization prior to allowing FDA or state regulatory authorities into the facility. We are not aware of any situation where an inspector has been denied entrance to a Wrigley facility. If our technical staff is not on site, it is possible that a Wrigley facility could request to re-schedule a factory visit to ensure we properly meet the inspector's needs.

Records of our product manufacture or laboratory testing are made available to inspectors at the time of the site visit. Wrigley does not allow records to be copied and/or retained by the inspector and would require a written request to forward confidential company records to the agency. We are not aware of any specific situations where records have been requested by an inspector.

Confidential

We appreciate this opportunity to provide input as your Committee works to formulate solutions to ensure the continued safety of the US food supply. If you should have any questions about the information provided here, please contact David Largey, Director - Global Quality Center of Excellence at 312-794-6508. We have identified this document as confidential and request notification prior to its distribution beyond the Members and staff of the Committee.

Respectfully submitted,



Joan Parrott-Sheffer
Vice President
Global Quality and ESH

cc: William D. Perez

bcc: Scott Thayer
David Largey
Chris Perille
Melissa Weber
JoAnn Milbratz