



Moody Dunbar, Inc.

Sweet Bell Peppers • Branded Pimientos • Private Labeled Sweet Potatoes

May 21, 2008

The Honorable John D. Dingell
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Bart T. Stupak
Chairman
Subcommittee on Oversight and Investigations
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Dingell and Chairman Stupak:

This letter is in response to your correspondence dated May 8, 2008 regarding the investigation of the safety of the United States' national food supply currently being conducted by the Committee on Energy and Commerce and its Subcommittee on Oversight and Investigations. Below are responses to each portion of the Committee's request for information occurring on or after January 1, 2000. A brief description of Moody Dunbar, Inc. and its integrated safety programs is also provided.

Moody Dunbar, Inc. (The Company) is an American family owned food processing company and a certified small business which has been in continuous operation by the Dunbar family for seventy five years. The Company operates two canning production facilities, one in California and one in North Carolina. The Company is headquartered in Tennessee. The two canning plants both operate within internal systems for food safety and quality assurance. Both plants are regularly inspected by Federal, state, and local agencies and third-party auditors. At the Federal level, we are subject to oversight by the Food and Drug Administration (FDA).

The Company's customer base includes other food manufacturers, retail food chains, and a variety of restaurant and institutional foodservice distributors. The Company works closely with this range of customer types and is required to meet stringent food safety standards and requirements. Many of these customers require detailed safety audits of the facilities on a regular basis and constantly monitor its performance on these audits.

Responses to the Committee's requests are as follows:

1. A list of all food recalls and food safety alerts issued by your company. For each recall or safety alert, please provide the date of the recall or alert, the product and the brand affected, and the reason for the recall or alert. If the food was affected by microbial or chemical contamination, please identify the contaminant.

RESPONSE: The Company has not had an incident involving either a product recall or a food safety alert from January 1, 2000 to the present. Properly processed canned foods are shelf-stable and commercially sterile. They are free of all microorganisms that are capable of reproducing in the food under normal non-refrigerated conditions, and free of viable microorganisms (including spores) of public health significance. Moody Dunbar, Inc. follows these high standards and safety practices and basic scientific principles derived over many years by the FDA and the canned food industry.

2. For each brand or kind of product, please list all instances when internal microbiological testing was found to be positive for the presences of *E. coli*, *Salmonella*, *Cyclospora cayetanensis*, *Cryptosporidium*, hepatitis A, *Clostridium botulinum*, or *Listeria* in excess of the highest acceptable to the Food and Drug Administration(FDA) or any State regulatory authority.

RESPONSE: Routine microbiological testing of canned foods is not required so long as FDA approved process standards are strictly enforced and documented. It is a well established fact that canned foods properly and correctly processed are commercially sterile; and thus, they are free of microorganisms capable of reproducing in the food and are free of viable microorganisms of public health significance. Since the Company adheres to FDA's strict standards, the Company has not needed to perform internal microbiological testing and has not found any of the above microbiological contaminants in any of its products.

The Company's Safety Program consists of many components. Both locations have HACCP (Hazard Analysis Critical Control Point) programs. The company is subject to FDA inspection at both manufacturing sites. In addition, the California Department of Health Services performs weekly inspections of our California facility, collecting samples from each production code and PH testing each code. No production code can be shipped from the California plant site without first being released by the California Department of Health Services.

The Company also, at the request of our customers, is inspected and audited by AIB International (a third party auditing agent) at both plants. These plants have consistently scored "Superior" or "Excellent" on these audits. Finally, the two plants are regularly and satisfactorily inspected and audited by third parties engaged by its customers.

3. For each brand or kind of product, please list the instances when internal testing was found to be positive for the presence of a chemical contaminant at levels in excess of the highest limit acceptable to FDA or any State regulatory authority.

RESPONSE: The Company has had no instances when internal testing was found to be positive for the presence of a chemical contaminant at levels in excess of the highest limit acceptable to the FDA or any State regulatory agency.

The Company inspects growers' crops in the field, and reviews grower pesticide application records in detail. Growers are also audited by third party auditors such as AIB International to make sure the records are accurate and maintained, and all chemicals are documented according to the USDA and State guidelines. Growers also participate in sustainable agriculture, which includes a written policy, stewardship practices, strategies, integrated pest management (IPM) and good grower crop management. The program provides assurance that products are safe from chemical contaminants for customers and the environment we live in. The program is audited every year.

4. For products imported into the United States for handling or processing by any facility operated by your firm, please list the instances when internal or outside laboratory testing was positive for the presence of either a chemical or microbiological contaminant in excess of FDA or State regulatory limits.

Response: The Company has not imported products into the United States since January 1, 2000.

5. For each of the above items, please specify whether FDA was notified, and if not, why not.

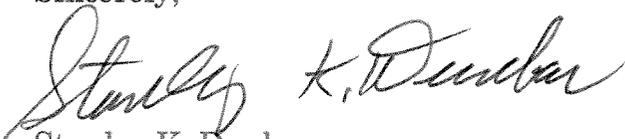
Response: The Company has not recalled any products or discovered chemical or microbiological contaminants in excess of FDA or State regulatory limits, so the Company has not needed to notify the FDA.

6. Please supply a list of all instances where FDA or any State regulatory authority was denied entrance to any facility, foreign or domestic, or denied access to any records regarding microbiological or chemical testing performed on products processed at the facility. This request encompasses denials of initial requests for entry or any such testing record regardless of whether the plant or its records were to be made available for inspection at a later date.

Response: The Company cooperates fully with FDA and state regulatory agencies during inspections. To the best of our knowledge, the Company has not denied entrance to the FDA or any State regulatory authority at any facility nor has the Company denied the FDA or any regulatory authority access to records and information requested.

In summary, we hope we have provided the information you have requested to assure you that Moody Dunbar, Inc. and its subsidiaries process very safe food products for Americans to purchase and consume.

Sincerely,



Stanley K. Dunbar
President and CEO

cc: The Honorable Joe Barton
Ranking Member
Committee on Energy and Commerce

The Honorable John M. Shimkus
Ranking Member
Subcommittee on Oversight and Investigations