



Paul Franz
*Manager, Commercial Practices
Group NA*

Associate General Counsel

1 P&G Plaza
Cincinnati, Ohio 45202

tel 513 983-6084/ fax 513 983-7635
franz.pa@pg.com / www.pg.com

May 22, 2008

John D. Dingell, Chairman
Bart Stupak, Chairman, Subcommittee on Oversight
and Investigations
U.S. House of Representatives
Committee on Energy and Commerce
Washington, DC 20515-6115

RE: Your Request Dated May 8, 2008

Gentlemen:

This letter is in response to your letter of May 8, 2008, requesting certain information concerning food products produced by The Procter & Gamble Company and/or its affiliates ("Procter & Gamble"). Procter & Gamble is dedicated to making life a little better every day for consumers around the world by selling products of superior quality and value. We are proud of our strong record of product quality and safety, and are pleased to voluntarily share this information about our food products.

As an initial matter, we would like to be clear about the scope of our responses. First, because your letter refers to "food products Americans purchase and consume," we are providing responses with respect to finished food for human consumption sold by Procter & Gamble in the United States. This will exclude products sold exclusively outside the U.S., as well as drugs, dietary supplements and food intended for animals. (As you may know, Procter & Gamble was instrumental in identifying and publicizing the issues related to pet food produced by Menu Foods. These issues led to a recall of a small segment of Procter & Gamble's pet food line.) Second, the time frame of your questions exceeds our record retention guidelines. We have provided what information we have, but cannot guarantee it is complete with respect to dates that exceed our retention guidelines. Finally, although it is not clear that chemicals listed under schemes like California's Proposition 65 are intended to be included (since Proposition 65



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listings are not limits), we note that Procter & Gamble was recently involved in a Proposition 65 issue in California related to acrylamide, a chemical that is formed whenever starchy foods are heated—e.g., baking a potato or bread. Acrylamide is a natural consequence of heating, and not a chemical contaminant of the sort your letter seems to be concerned with.

Within the scope outlined above, below is the information requested in your letter.

Your letter asked (Question 1) for a list of all food recalls and food safety alerts issued by Procter & Gamble. We have identified three instances where Procter & Gamble has initiated a market withdrawal for one of its food products. None of these would, in our view, constitute a recall or safety alert, but in the interests of being fully transparent we have listed them below.

March 4, 2004 – Procter & Gamble initiated a withdrawal of 6-can bundle packs of Pringles potato crisps because the outer container failed to list rice as an ingredient (the inner containers were correctly labeled). There were no product quality or safety issues involved in this retrieval.

October 3, 2001 – Procter & Gamble initiated a withdrawal of Sunny Delight juice drink because the product contained greater than the labeled amount of salt. Although this was a product quality issue, it did not involve microbial or chemical contamination.

April 18, 2001 – Procter & Gamble initiated a withdrawal of Pringles potato crisps because the ingredient statement listed “corn starch” instead of “corn meal”. There were no product quality or safety issues involved in this retrieval.

In each of the above instances, the Food & Drug Administration (“FDA”) was notified about the withdrawal (Question 5).

Your letter asked (Questions 2 and 3) for a list of instances where internal testing found the presence of chemical or certain microbial contamination in excess of applicable FDA or state limits. Procter & Gamble controls for microbial and chemical contamination in its food products using a program whereby qualified suppliers test raw materials through qualified laboratories for relevant contaminants. A “positive release” system ensures that raw materials are not used in Procter & Gamble’s manufacturing process until they are certified as meeting Procter & Gamble’s required standards. Because any raw materials containing excess levels of microbial or chemical contamination are screened out



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in advance, rather than tested for in finished product, there are no instances where internal testing indicates excess levels of contamination in Procter & Gamble's finished food products. This positive release system has been validated and shown to provide a high quality, safe product. Our regulatory, safety, and quality assurance teams monitor emerging food safety issues and update our positive release system as needed to ensure we are testing at the right frequencies and for the right substances.

Your letter also asked (Question 4) for a list of instances where raw materials or finished product was imported into the U.S. and testing indicated the presence of chemical or microbial contamination in excess of applicable FDA or state limits. Procter & Gamble does not normally import food products or ingredients into the U.S., except for green coffee, soluble coffee, and the occasional finished product. Materials imported by our suppliers are subject to the quality program described in the previous paragraph. For green coffee, soluble coffee, and the occasional finished product imported by Procter & Gamble, there are no instances where testing has indicated excess levels of microbial or chemical contamination.

Finally, your letter asked (Question 6) for a list of instances where FDA or state regulators were denied entrance to any Procter & Gamble facility or denied access (even temporarily) to any records regarding microbiological or chemical testing performed on products processed at the facility. We are not aware of any such instance.

We hope this information has been helpful. Please feel free to contact me if you have any further questions. My contact information can be found at the top of this letter.

Very truly yours,

Paul Franz