



Kendall J. Powell
Chairman and Chief Executive Officer

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GENERAL MILLS

June 3, 2008

Honorable Chairman Dingell
Committee on Energy & Commerce
U.S. House of Representatives
Washington, D.C. 20515

Honorable Chairman Bart Stupak
Subcommittee on Oversight & Investigations
Committee on Energy & Commerce
U.S. House of Representatives
Washington, D.C. 20515

Re: Letter Requesting Food Safety Data Dated May 8, 2008

Dear Chairman Dingell and Chairman Stupak:

This letter is in response to your letter dated May 8, 2008 addressed to my predecessor, Mr. Stephen Sanger. It incorporates all of the information and responses previously provided by Dr. Elizabeth Westring, the Vice-President of Quality and Regulatory Operations for General Mills. General Mills shares the Committees' concerns about ensuring a safe food supply in the United States. As a leading food manufacturer, we are committed to delivering brands our consumers trust and value.

General Mills, Inc. ("General Mills") is a major global packaged food manufacturer engaged for over 75 years in the development and production of food products including flour, ready-to-eat-cereals, refrigerated dough products, yogurt, dessert mixes, soups, vegetables, snacks and numerous other products. American consumers purchase and consume our products every day. These products sold in the United States are manufactured in numerous owned or contract manufacturer locations. We have long been an industry leader in developing and implementing quality management systems that are designed to ensure the safety of the food we produce and sell.

General Mills has operated using world-class standards and programs for food safety, food defense and quality throughout our history. For example, we pioneered the Hazard Analysis and Critical Control Point system (HACCP) to identify and reduce risks to food safety, led awareness and development of new industry-leading control programs for allergens, and volunteered as the first food manufacturer to host a multi-agency initiative to improve food safety and security, namely, the Strategic Partnership Program Agroterrorism Initiative. Each of our manufacturing locations has written food safety and food defense plans which are supported by comprehensive internal and third party verification programs. As a global company, we apply stringent safety and quality standards wherever we do business.

In response to your letter dated May 8, 2008, General Mills submits the following information for finished products produced in the United States and for finished products and ingredients imported into the United States, for consumption in the United States. The General Mills Quality and Regulatory Operations organization reviewed its centralized records for information related to chemical contaminants. Microbiological information was obtained from each manufacturing facility and compiled by the Director of Food Safety and Regulatory

Affairs. Data were not available for every year for every question from every location. The Pillsbury Company was acquired by General Mills in November 2001 and Pillsbury's record-keeping practices may have varied from General Mills' for periods prior to the acquisition as well as during the subsequent integration period. The data represent our best efforts to compile information presently available from company owned facilities and contract manufacturers for General Mills products imported into the United States or produced in the United States for sale in the United States.

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 brand affected, and the reason for the recall or alert. If the food was affected by microbial or chemical contamination, please identify the contaminant."*

General Mills has issued ten U.S. food recalls since 2000. We also have recall information for The Pillsbury Company for four events that occurred prior to its acquisition by General Mills (November of 2001). We have issued no food safety alerts. **(See Attachment 1)**

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

The data provided in Attachment 2 represent our internal (including testing we request from third party labs or our contract manufacturers) finished product testing for the pathogens *E. coli* 0157:H7, *Salmonella*, *Cyclospora cayetanensis*, *Cryptosporidium*, *Hepatitis A*, *Clostridium botulinum* and *Listeria monocytogenes*. **(See Attachment 2)**

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."*

In our comprehensive review of company testing records, we found that all our marketed products have met Federal and State regulatory limits for pesticides and other chemical contaminants. In one instance, the company found unacceptable pesticide levels in a purported organic fruit from a prospective supplier; that product was rejected. **(See Attachment 3)**

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."*

As with our domestic production, our review of the company's testing records of imported products and ingredients has shown them generally to be in compliance with U.S. regulatory requirements. In the instances noted in the attachment, some imported produce was found to have unacceptable pesticide levels; those products were rejected or destroyed. **(See Attachment 4)**

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

General Mills of course advises FDA (or USDA if appropriate), of all recalls, and as noted in Attachment 4, FDA was involved in two import actions. Where product was simply rejected back to the supplier or importer or was destroyed while in our possession, FDA was not informed.

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.”

Both law and company policy requires that FDA and State inspectors be given immediate access to company facilities, as well as any records to which access is mandated by statute or regulation. There is no instance of any denial of these requirements. In instances where records are protected and not required to be made available, our company policy requires the inspected site to ask for a written request from the inspector describing the need for the record, which is promptly reviewed with the requesting agency by corporate headquarters.

The information contained in this letter and the attachments is confidential, proprietary, and may contain trade secret information. I therefore ask that these materials receive confidential treatment by the Committees. I welcome the opportunity to answer any questions you might have about this information, and General Mills looks forward to ensuring that it has been responsive to the Committees' inquiry.

Sincerely,



Kendall J. Powell
Chairman and Chief Executive Officer

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

The Honorable John Shimkus, Ranking Member
Subcommittee on Oversight & Investigations