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ALAN D. WILSON  
PRESIDENT & CEO  
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June 12, 2008

The Honorable John D. Dingell  
Chairman  
House Committee on Energy and Commerce  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Bart Stupak  
Chairman  
Subcommittee on Oversight and Investigations  
House Committee on Energy and Commerce  
2125 Rayburn House Office Building  
Washington, DC 20515

Re: McCormick & Company, Inc. Response to May 8, 2008 Request for the  
Company's International Operations

Dear Chairman Dingell and Chairman Stupak:

On May 30, 2008, I wrote to you with information concerning McCormick & Company, Inc.'s ("McCormick" or "the Company") domestic operations in response to your May 8<sup>th</sup> request to provide the House Committee on Energy and Commerce and its Subcommittee on Oversight and Investigations ("the Committee") with information concerning possible microbiological or chemical contamination of food processed and sold by the Company. I am writing now to further respond to your inquiries with information about McCormick's overseas operations that import food products into the United States. We appreciate your willingness to extend us this extra time to search for and collect information from our international facilities.

Our response focuses on finished products that are manufactured by our foreign operations and imported into the United States. We do not include in this response information on raw materials that are shipped by these foreign operations to our domestic operation for further processing. Our earlier response would have captured the microbiological and chemical contaminant testing results and other potentially responsive information regarding such imported raw materials.

As with our May 30<sup>th</sup> response, we reviewed information in our files concerning microbiological and chemical test results from internal and external lab testing. We also contacted the responsible individuals at our international manufacturing facilities and asked them to review the microbiological and chemical contaminant testing data. When available, we reviewed information that dates back to January 1, 2000. However, for a number of our overseas

operations, records were not available back to 2000; in those instances we reviewed records as far back as they were available. When compiling our response, we included information in our files from companies that we have acquired since January 1, 2000. We have not divested any overseas facilities that manufacture products for the U.S. during that time period.

Below, we set out each question and our response.

*Question #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.*

McCormick has not recalled or issued any food safety alerts concerning any of the products we have manufactured in our foreign operations and imported into the United States.

*Question #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.*

As we described in our May 30<sup>th</sup> response, McCormick is engaged in the manufacture, marketing and distribution of spices, herbs seasonings and flavors. Because such raw agricultural commodities have the potential to be exposed to microbial contamination during growth, harvest, storage and transportation, we employ process controls and upstream testing to assure the integrity of the finished product, including the use of proprietary micro-reduction treatments. Our international operations test raw materials and rely on certificates of analysis and certificates of compliance. In some countries, due diligence compliance involves considerable testing, including end product testing. In addition, our foreign facilities operate under a Hazard Analysis Critical Control Point (HACCP) plan and are routinely audited and receive certification for compliance with food safety and quality standards such as ISO, IFS, or BRC & SQF 2000.

The programs employed by the Company's foreign operations are comparable to those used by the domestic operations. We monitor our spices and other raw materials for *E. coli*, *Salmonella* and *Listeria*. We test for the generic category of *E. coli* and *Listeria*, which includes many strains that are non-pathogenic and considered unharmed. We do not test for the other microorganisms listed in your request.

Between 2004 and 2008, McCormick subjected finished products manufactured in China to nearly 3,000 *Salmonella* tests, which is over and above the standard process controls and testing. We instituted this additional testing in response to public concerns regarding outbreaks linked to Chinese products. None of the finished products tested positive for *Salmonella*.

Our review of our international records did not identify any instance of a positive result for the microorganisms tested for any McCormick finished products manufactured by our foreign operations and imported into the United States.

Question #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.*

We reviewed our files and found no instances in which one of the finished products manufactured by our foreign operations and imported into the United States tested positive for a chemical contaminant.

Question #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 noted in response to questions 2 and 3 above, we have nothing to report.

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

We have nothing to report.

Question #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.*

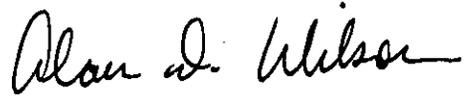
We are unaware of any instance in which we denied FDA or a state regulatory agency entry to our foreign facilities. Indeed, one McCormick joint venture in India hosted a tour of the facility for HHS Secretary Leavitt earlier this year. The tour was well received and Secretary Leavitt posted his impressions on his blog (available at [http://secretarysblog.hhs.gov/my\\_weblog/2008/01/day-3-in-india.html](http://secretarysblog.hhs.gov/my_weblog/2008/01/day-3-in-india.html)). We also are unaware of any instance in which we have denied FDA or state agencies access to any records regarding microbiological or chemical testing performed on products processed at our overseas facilities.

\* \* \*

McCormick is very proud of its record of success in implementing and maintaining controls in its foreign operations to prevent or eliminate the introduction into commerce of food containing chemical or microbiological contaminants that would render the food unsafe or adulterated. We are committed to offering the highest quality, safest products from both our overseas and domestic operations. We have tried our best to identify all responsive documents and believe we have done so. If we find additional responsive documents, we will file a supplemental response.

As with our May 30<sup>th</sup> response, we do not view this submission as waiving any rights, privileges, or immunities.

Respectfully submitted,

A handwritten signature in black ink that reads "Alan D. Wilson". The signature is written in a cursive style with a prominent initial "A".

Alan Wilson  
President and Chief Executive Officer  
McCormick & Company, Inc.

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

The Honorable John Shimkus, Ranking Member  
Subcommittee on Oversight and Investigation