



GRIFFIN INDUSTRIES

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November 14, 2005

Dear Valued Customer:

On October 6, 2005, The Food and Drug Administration (FDA) issued a proposed rule (Docket No. 2002N-0273) in the Federal Register. It is the FDA's position that the proposed rule is needed to further strengthen the existing safeguards in place that are designed to help prevent the spread of Bovine Spongiform Encephalopathy (commonly known as BSE) in U.S. cattle. This position is not supported by Animal Agriculture, the Rendering Industry and State Agencies dealing with the disposal of the affected material.

A summary of the proposed rule states the following:

The Food and Drug Administration (FDA) is proposing to amend the agency's regulations to prohibit the use of certain cattle origin materials in the food or feed of all animals. These materials include the following: brains and spinal cords from cattle 30 months of age or older; the entire carcass of any cattle not inspected and passed for human consumption unless the brain and spinal cord have been removed, including dead cattle and calves and nonambulatory livestock; and mechanically separated beef derived from any of the materials prohibited by the proposed rule.

WHAT DOES THIS MEAN?

This proposed rule requires that at all slaughter operations all Specified Risk Material (brains and spinal cords from cattle 30 months of age and older) and all deadstock and downer animals, must be removed and kept separate from all other inedible material for separate disposal to the local landfill. If this proposal is finalized by the FDA, we will cease our removal service of all dead animals due to the impossible task of removal of all brains and spinal cords from all ruminant animals. It is also possible that Griffin Industries might have to discontinue rendering service to all locker plants due to the impossible task of identifying all SRM's and to what category they should be classified, above or below the 30 month of age time frame. The increased and unwanted disposal of dead animals and SRM's will lead to environmental and animal health problems that the FDA has not considered in this proposal.

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2002N-0273

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WHAT CAN YOU DO TO HELP?

The FDA has granted a 75 day comment period for affected parties to respond with comments regarding the proposed rule. Griffin Industries would appreciate your participation by submitting comments back to the FDA indicating your disapproval of this proposed rule. The deadline for the comment period is December 20, 2005. A simple handwritten comment using any of the following talking points would be very helpful in getting the FDA to reconsider this unwarranted regulation. The BSE issue is winding down and the USDA's brain testing program has scientifically proven that the U.S. cattle population is safe from this European disease.

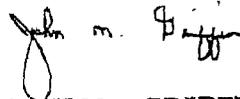
TALKING POINTS FOR RESPONSES:

- a. No need for additional feed restrictions based on current compliance
- b. The current ruminant to ruminant feed ban created in 1997 has been in force longer than most living animals and within two years will have survived all living cattle.
- c. The current USDA Surveillance Program clearly shows we do not have a BSE risk to the United States cattle population and support the data of the Harvard Risk Analysis Study.
- d. The FDA must maintain its regulatory decisions based on science, not political or international trade influence.
- e. The FDA must conduct an environmental assessment of the animal disposal issue created by this proposed regulation and the associated animal and human health concerns created by improper disposal and the increase cost associated by such action.
- f. With such action proposed by a federal agency with no enforcement ability, how will the FDA fund the state agencies who must deal with animal disposal and increased human health problems associated with animal disposal?
- g. Any other personal comments you feel will be helpful in getting the FDA to reconsider this unwarranted action.

If you would like to read and review the proposed rule in its entirety, it can be found on the FDA Web Site listed on the attached sheet. Also, included on the attached sheet is the various ways you can send your comments to the FDA before the December 20, 2005 deadline. If you have any additional questions or concerns that you would like to discuss regarding this matter, please call or write your local Griffin Industries Representative.

Your prompt attention to this matter is greatly appreciated!

Sincerely,



JOHN M. GRIFFIN, PRESIDENT
GRIFFIN INDUSTRIES, INC.