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**Sent:** Monday, July 10, 2006 3:29 PM  
**To:** FSIS RegulationsComments  
**Subject:** Docket #04-026N

Please find attached a document from Food & Water Watch, to be include in Docket # 04-026N, Notice on Salmonella Verification Sample Result Reporting: Agency Policy and Use in Public Health Protection.

Thank you.

## **BACKGROUND**

USDA's Food Safety and Inspection Service (FSIS), the government agency responsible for inspecting meat and poultry, has established acceptable levels of *Salmonella* contamination for different types of meat and poultry. Of particular concern, the agency's testing has demonstrated an increase in the percentage of broiler chickens contaminated with *Salmonella*, from 9.09% in 2000 to 16.25% in 2005.<sup>6</sup>

In 1998, FSIS began enforcing a new *Salmonella* standard by testing raw and ground products for the presence of the pathogen. The purpose of the new program was to use microbial sampling to determine when plants were not controlling food safety hazards in their production processes. Testing was also supposed to serve as an objective indicator of when industry and/or government were not fulfilling their food safety responsibilities.

The acceptable level of contamination established for each product was based on the average level of *Salmonella* present for each class of product at the time that initial baseline tests were taken. Consequently, the USDA's acceptable percentage of *Salmonella* contamination varies greatly by product.

<b>Type of Product</b>	<b>Acceptable Level of <i>Salmonella</i> Contamination</b>
Steers and Heifers	1.2%
Cows and Bulls	3.5%
Ground Beef	9.5%
Hogs	10.9%
Broiler Chickens	23.5%
Fresh Pork Sausage	34.0%
Ground Chicken	49.1%
Ground Turkey	54.7%

To determine the contamination level for a particular plant, the USDA tests a sample of the finished product each day that the plant is operating until the requisite number of samples are taken. The number of required daily samples differs by species. So, for example, the testing period for an plant that slaughters steers and heifers would be as long as is necessary to collect 82 daily samples, whereas the testing period for a broiler chicken plant would be long enough to collect 51 daily samples. The length of the testing period is also affected by the frequency with which a plant produces the product. Some small plants do not produce every day, and therefore the testing period would be longer at these plants to collect the same number of samples. The "contamination rate" of a plant is the percentage of the daily samples that are contaminated with *Salmonella* during the testing period.

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<sup>6</sup> [http://www.fsis.usda.gov/PDF/Serotypes\\_Profile\\_Salmonella\\_Tables\\_&\\_Figures.pdf](http://www.fsis.usda.gov/PDF/Serotypes_Profile_Salmonella_Tables_&_Figures.pdf)



## **METHODS**

The *Salmonella* testing results for 1998 through 2003 were acquired using the Freedom of Information Act. We have analyzed numerous FSIS testing databases over the past ten years and routinely discovered errors or gaps in the data. In the data available here, we discovered that up to three percent of the tests may be missing from the database. All of our calculations are based on the data available in the records we received.

The records we received from the agency listed results by the plant's establishment number. We found the names of the companies operating these plants in the "Meat, Poultry and Egg Product Inspection Directory," found on the agency's website.<sup>9</sup> We used the version of directory available during June 2006. The directory does not provide information for a few of the plants we found in the test result database, which are indicated on the chart.

## **FINDINGS**

### Overall

Our analysis found that 106 broiler chicken plants in 27 states and Puerto Rico failed to meet the performance standard in at least one *Salmonella* testing period. These plants are listed in Attachment 1. A more detailed chart, including states and dates of testing can be found in Attachment 2.

Our analysis of the data also confirms that the *Salmonella* contamination rate has risen in the past two years. Using a modified version of the performance categories the agency plans to use, we analyzed the number of test periods in each of the categories rather than the number of plants (which might have more than one test period per year.)

<b>Test Periods by Contamination Rate and Year</b>				
<b>Year</b>	<b>Zero Contamination</b>	<b><u>Category 1</u> Less than 12% Contamination</b>	<b><u>Category 2</u> 13-24% Contamination</b>	<b><u>Category 3</u> 25% or more Contamination (Failed to meet USDA standard)</b>
1998 - 2003	9.7%	54.2%	24.4%	11.8%
2004	4.3%	53.1%	30.3%	12.4%
2005	4.6%	47.2%	30.3%	18.0%

<sup>9</sup> [http://www.fsis.usda.gov/Regulations\\_& Policies/Meat\\_Poultry\\_Egg\\_Inspection\\_Directory/index.asp](http://www.fsis.usda.gov/Regulations_& Policies/Meat_Poultry_Egg_Inspection_Directory/index.asp), accessed during June 2006.

Finally, our analysis shows that a recent change to the policy on testing frequency, which would delay testing for some plants, could cause plants with troubling rates of contamination to escape testing.

The USDA notice, released June 29, 2006, states that plants that had two testing periods with contamination rates less than half the acceptable level (less than 12 percent), would not likely be scheduled for more testing for 12 to 24 months because of their above average performance. This reliance on previous performance is misguided, as circumstances in a plant can change very quickly. This is indicated in the testing database, which reveals dramatic changes in contamination rates in plants from one testing period to another.

If this new standard had been in effect during the 1998 to 2005 period we examined, up to 22 plants which failed to meet the *Salmonella* standard would have likely not have been tested because they had less than 12 percent contamination in two previous testing periods.

## The Top 7 Companies

The following is the analysis of all testing data from 1998 through 2005 of the seven companies operating the most broiler chicken plants.

***NOTE: A contamination rate below 24% meets the USDA's standard.***

**Tyson Foods, Inc.** operates 36 broiler-producing plants and FSIS recorded 253 test periods at those plants. *(The government data appears to be missing seven test period results.)*

10 of the 36 plants (27.8%) failed at least one test period.

5.1% of the company's total test periods resulted in failure.

The average contamination rate of failing test periods was 33.0%.

The average contamination rate of passing test periods was 7.7%.

**Pilgrim's Pride Corporation** operates 22 broiler-producing plants and FSIS recorded 164 test periods at those plants. *(The government data appears to be missing six test period results.)*

7 of the 22 plants (31.8%) failed at least one test period.

9.2% of the company's total test periods resulted in failure.

The average contamination rate of failing test periods was 35.0%.

The average contamination rate of passing test periods was 8.8%.

**Goldkist Inc.** operates 11 broiler-producing plants and FSIS recorded 78 testing periods at those plants. *(The government data appears to be missing four test period results.)*

5 of the 11 plants (45.5%) failed at least one test period.

9.0% of the company's total test periods resulted in failure.

The average contamination rate of failing test periods was 40.9%.

The average contamination rate of passing test periods was 10.2%.

**Perdue Farms** operates ten broiler-producing plants and FSIS recorded 66 test periods at those plants. *(The government data appears to be missing one test period result).*

5 of the 10 plants (50%) failed at least one test period.

9.1% of the company's total test periods resulted in failure.

The average contamination rate of failing test periods was 36.0%.

The average contamination rate of failing test periods was 11.2%.

**Wayne Farms** operates seven broiler-producing plants and FSIS recorded 56 test periods at those plants. *(The government data appears to be missing two test period results).*

5 of the 7 plants (71.4%) failed at least one test period.

14.3% of the company's total test periods resulted in failure.

The average contamination rate of failing test periods was 32.0%.

The average contamination rate of passing test periods was 10.7%.

**Sanderson Farms, Inc.** operates six broiler-producing plants and FSIS recorded 43 test periods at those plants. *(The government data appears to be missing one test period result).*

None of the plants failed any test period.

The average contamination rate of passing test periods was 6.3%.

**Foster Farms** operates four broiler-producing plants and FSIS recorded 22 test periods at those plants. *(No test periods appear to be missing from the government data.)*

2 of the 4 plants (50%) failed at least one test period.

13.7% of the company's total test periods resulted in failure.

The average contamination rate of failing test periods was 32.0%.

The average contamination rate of passing test periods was 9.18%.

## **RECOMMENDATIONS**

In light of these findings, Food & Water Watch recommends that:

- The USDA should seek legislation that makes performance standards enforceable under the meat and poultry inspection statutes.
- The USDA should publish on its website *Salmonella* testing results for each plant on a quarterly basis, including the number of samples taken at the plant and the number that tested positive for *Salmonella*.
- The USDA should abandon a new policy that plants which had less than half the acceptable rate of *Salmonella* in their last two testing periods will not be scheduled for another testing period for 12 to 24 months.





# These broiler chicken establishments failed to meet USDA's standard for *Salmonella* at least once between January 1998 and December 2005.

TYSON		PILGRIM'S PRIDE	
Est. #	Year of Failure	Est. #	Year of Failure
P-164	2000, 2003	P-121	2000, 2002
P-622	2005	P-843	2001, 2002
P-758	2005	P-1279	1999, 2001, 2003
P-806	2000, 2002	P-5787	2001
P-1241	2001, 2005	P-6638	1999, 2003
P-5842*	2005	P-13485	2001, 2002, 2004
P-6651	2005	P-17340	1999
P-7085	2002	GOLDKIST	
P-7089	1998	Est. #	Year of Failure
P-19514	2004	P-16	2002
WAYNE FARMS		P-413	2002
Est. #	Year of Failure	P1201	1999, 2002
P-170	1998	P-1277	2004
P-445	2001, 2003	P-17500	2005
P-912*	2005	PERDUE	
P-1009	1998, 2003	Est. #	Year of Failure
P-1235*	2005	P-764	2004
FOSTER FARMS		P-1243	2000
Est. #	Year of Failure	P-1318	2003
P-6137	2001	P-2178	1999, 2004
P-6164A*	2002, 2005	P-7903	2004

FAILURES at SMALLER COMPANIES			
Est. #	Year of Failure	Est. #	Year of Failure
P-3	1998	P-6510	1998
P-39	1999	P-6529	2002
P-134*	2000, 2004	P-6616*	2005
P-290	1999	P-7470*	2005
P-308	1998, 2004	P-7487*	1999, 2005
P-322	2001	P-7632	1999
P-385	2000	P-7927	1999, 2000
P-396	1999	P-7987	2002
P-419*	2005	P-8107*	2002
P-468	1999	P-9897*	2000
P-493*	2005	P-9965	2004
P-509	1999, 2003	P-12432*	2005
P-533	2002, 2003	P-12434*	2000, 2003, 2004
P-667	2005	P-13369*	2005
P-687	2004	P-15724	2002
P-727	2003	P-18414	2003, 2004, 2005
P-744	2000	18739*	2000, 2000, 2005
P-794	2000	18927*	2005
P-890	2004	18978	2002, 2003, 2004
P-910	2005	19014*	2001
P-930*	2005	19128*	2000, 2005
P-1009	1998, 2003	19865*	1999, 2001, 2001, 2002, 2004, 2004
P-1015	2002, 2003	20138*	1999, 2000
P-1257	2002	20251*	2001, 2003, 2005
P-1283	2005	20322	2002, 2002
P-1304*	2002, 2005	20446*	2005
P-1309	2001, 2004	20538*	2002, 2005
P-1538*	2005	20604	2004
P-2028*	2005	20979	2001, 2001
P-2882*	2005	27425*	2005
P-4653A*	2000, 2005	31567	2004
P-6504	1999		

\* indicates an establishment for which we have no record of a passing test period after the last Year of Failure listed in this chart.

The data used to make this chart ended in December 2005. USDA typically conducts at least one test period per year, at each establishment. They may conduct more than one. Passing test periods are *not* listed.

Each package of raw poultry must display the establishment number in either the inspection legend oval or, by itself, on other labeling material.





# Salmonella Failures at USDA-Inspected Broiler Chicken Establishments, 1998-2005

Establishment Number	Company Name	State	Number of Passing Test Periods 1998 - 2005	Dates of Failed Test Periods	Contamination Rate of Failed Test Periods
3	Mountaire Firms of Delaware	DE	5	4/24/98 - 6/25/98	47.06%
				8/24/98 - 11/11/98	27.45%
16	Gold Kist, Inc.	NC	5	3/26/02 - 7/15/02	25.49%
				8/22/02 - 11/18/02	33.33%
39	Pine Manor/Miller Poultry	IN	6	3/11/99 - 6/3/99	43.14%
121	Pilgrim's Pride Corp.	AR	4	2/8/00 - 5/3/00	49.02%
				10/2/01 - 1/10/02	39.22%
134	David Elliot Poultry Farm Inc.	PA	3	4/1/00 - 8/31/00	31.37%
				2/24/04 - 7/7/04	27.45%
164	Tyson Foods, Inc.	MS	6	2/8/00 - 4/21/00	27.45%
				5/19/03 - 8/7/03	27.45%
170	Wayne Farms LLC	GA	6	3/3/98 - 5/19/98	27.45%
290	Townsend's, Inc.	NC	7	3/9/98 - 7/27/99	41.18%
308	Koch Foods of Mississippi LLC	MS	7	3/19/98 - 6/11/98	27.45%
				2/16/04 - 4/22/04	29.41%
322	Gold'n Plump Poultry, Inc.	MN	8	12/1/00 - 3/1/01	41.18%
385	Not Listed at Agency Website		3	6/21/99 - 8/3/00	27.45%
396	Townsend's, Inc.	NC	2	6/1/99 - 8/11/99	58.82%
413	Gold Kist Holdings	AL	7	8/12/02 - 10/25/02	39.22%
419	Case Farms of NC, Inc.	NC	5	4/25/05 - 7/12/05	56.86%
445	Wayne Farms LLC	NC	7	1/2/01 - 3/20/01	29.41%
				5/19/03 - 8/5/03	27.45%
468	Townsend's of Arkansas, Inc.	AR	7	3/10/98 - 10/29/99	27.45%
493	B.C. Natural Chicken, Inc.	PA	6	2/8/05 - 4/22/05	50.98%
509	Koch Foods LLC	TN	6	6/1/99 - 8/17/99	45.01%
				4/7/03 - 6/19/03	25.49%
				1/3/02 - 4/9/02	31.37%
533	Hain Pure Protein Corp.	PA	5	9/23/02 - 1/6/03	64.71%
				7/7/03 - 8/20/03	Set stopped before completion
622	Tyson Foods, Inc	NC	7	1/4/05 - 4/15/05	47.06%
667	Montaire Farms/Delmarva, Inc.	DE	4	1/3/05 - 3/21/05	54.90%

687	Columbia Farms, Inc.	SC	6	10/13/03 - 1/19/04	29.41%
727	Simmons Foods,	MO	6	1/6/03 - 3/26/03	33.33%
744	Vineland Kosher Poultry Co.	NJ	4	5/15/00 - 9/5/00	43.14%
758	Tyson Foods, Inc.	MS	8	1/6/05 -3/22/05	37.25%
764	Perdue Farms Inc.	MD	7	2/10/04 - 5/5/04	60.78%
794	B & B Poultry Co, Inc.	NJ	3	2/18/00 - 12/5/00	29.41%
806	Tyson Foods, Inc.	VA	7	5/1/00 - 7/19/00	27.45%
				1/7/02 - 3/28/02	35.29%
843	Pilgrim's Pride Corp.	NC	6	11/27/00 - 2/20/01	29.41%
				10/14/02 -12/30-02	25.49%
877	Not Listed at Agency Website		5	12/18/01 - 4/2/02	29.41%
890	Peco Foods, Inc.	MS	4	2/11/04 - 4/27/04	27.45%
				7/27/04 - 10/06/04	39.22%
910	Harrison Poultry, Inc.	GA	7	1/3/05 - 3/15/05	33.33%
				5/9/05 - 7/25/05	58.82%
912	Wayne Farms LLC	AL	7	4/26/05 - 7/29/05	41.18%
930	Fulton Processors, Inc.	CA	6	7/26/05 -11/28/05	37.25%
1009	Wayne Farms LLC	AR	6	3/9/98 - 6/8/98	37.25%
				8/18/98 - 10/30/98	29.41%
				4/4/03 - 6/24/03	33.33%
1015	Empire Kosher Poultry, Inc.	PA	3	7/15/02 - 10/22/02	31.37%
				1/6/03 - 4/9/03	25.49%
1201	Gold Kist, Inc.	NC	5	4/6/98 - 2/4/99	35.29%
				4/1/02 - 8/28/02	41.18%
1214	Not Listed at Agency Website		4	3/5/1999 - 5/25/99	31.37%
1235	Wayne Farms	AL	7	2/15/05 - 4/27/05	31.37%
1241	Tyson Foods, Inc.	IN	7	11/29/00 - 2/22/01	33.33%
				4/25/05 - 7/19/05	29.41%
1243	Perdue Farms, Inc.	NC	5	2/8/00 - 6/2/00	25.49%
1257	Fieldale Farms Corp.	GA	7	3/18/02 - 6/4/02	31.37%
				8/12/02 - 10/25/02	27.45%
1277	Gold Kist Poultry	GA	7	9/29/03 - 1/13/04	47.06%
1279	Pilgrim's Pride	GA	7	3/2/99 - 5/17/99	31.37%
				10/8/01 - 12/27/01	33.33%
				3/17/2003 - 6/4/03	43.14%
1283	Forest Packing Company	MS	6	1/3/05 - 3/16/05	41.18%
1304	Farmer's Pride, Inc.	PA	5	12/13/01 - 3/20/02	37.25%
				4/29/02 - 7/17/02	35.29%
				2/7/05 - 4/25/05	41.18%
1309	Columbia Farms, Inc.	SC	4	3/12/01 - 6/25/01	54.90%
				7/25/01 - 11/16/01	37.25%
1318	Perdue Farms, Inc.	DE	6	6/8/04 - 9/2/04	25.49%
				3/18/03 - 6/11/03	29.41%

1538	Wapsie Produce, Inc.	IA	0	6/6/05- 12/12/05	39.22%
2028	Culver Duck Farms, Inc.	IN	2	5/27/03 -3/25/05	25.49%
2178	Perdue Farms, Inc.	DE	7	3/2/99 - 5/25/99 6/7/04 - 8/24/04	37.25% 25.49%
2640	Not Listed at Agency Website		4	1/2/02 - 4/5/02	33.33%
2882	Petaluma Acquisition LLC	CA	4	8/12/04 - 1/3/05 6/13/05 - 9/13/05	39.22% 27.45%
4653A	Agriprocessors Inc.	IA	2	5/9/00 - 11/29/00 8/1/05 - 12/1/05	25.49% 29.41%
5787	Pilgrim's Pride Corp.	LA	7	3/12/01 - 5/30/01 7/16/01 -10/12/01	33.33% 47.06%
5842	Tyson Foods, Inc.	AR	6	1/19/05 - 4/12/05	27.45%
6137	Foster Poultry Farms	CA	7	3/7/01 - 5/31/01	27.45%
6164A	Foster Poultry Farms	WA	2	3/20/02 - 6/12/02 11/11/04 - 1/24/05	25.49% 43.14%
6504	Peco Foods Inc.	AL	8	3/2/99 - 5/20/99	35.29%
6510	Peco Foods Inc.	MS	7	4/17/98 - 7/6/98 9/15/98 - 12/7/98	27.45% 27.45%
6529	Sylvest Farms, Inc.	AL	8	8/14/02 - 10/31/02	29.41%
6616	Peco Foods, Inc.	MS	7	7/27/05 - 11/10/05	25.49%
6638	Pilgrim's Pride Corp. of Delaware	AL	8	3/3/99 - 5/27/99 3/18/03 - 6/9/03	25.49% 27.45%
6651	Tyson Foods, Inc	TN	5	11/8/04-2/7/05	25.49%
				5/17/00 - 9/11/00	35.29%
				10/11/00 - 1/25/01	50.98%
6658	Not Listed at Agency Website		0	4/25/02 - 6/17/02	Set stopped before completion
				2/20/03 - 4/9/03	Set stopped before completion
7085	Tyson Foods, Inc.	OK	8	1/3/02 - 3/19/02	27.45%
7089	Tyson Foods, Inc.	MO	7	3/5/98 - 6/1/98	29.41%
7372	Not Listed at Agency Website		3	3/2/98 - 7/22/98 10/5/98 - 12/22/98	29.41% 33.33%
7470	Mountaire Farms, Inc.- NC Div.	NC	5	8/04/05- 12/30/05	45.01%
7487	Koch Foods LLC	TN	5	6/3/99 - 10/11/99 3/8/05- 6/23/05	37.25% 27.45%
7632	Zorro Leasing LLC	CA	7	3/3/99 - 5/26/99 8/13/99 - 11/4/99	27.45% 31.37%
7903	Perdue Farms, Inc.	VA	7	10/7/03- 1/16/04	37.25%
7927	Allen Family Foods, Inc.	MD	7	12/9/98 - 3/9/99 2/14/00 - 5/2/00	43.14% 31.37%
7987	Amick Farms, Inc.	SC	5	7/19/2001 - 1/15/02	27.45%
8107	Squab Producers of CA	CA	1	3/2/01 - 7/16/02	25.49%
8215	Not Listed at Agency Website		0	11/2/00 - 6/13/01	60.78%

<b>8418</b>	Not Listed at Agency Website		2	3/13/00 - 8/10/00	31.37%
<b>9194</b>	Not Listed at Agency Website		2	11/30/00-2/23/01	27.45%
<b>9885</b>	Not Listed at Agency Website		0	11/6/00 - 12/25/01	33.33%
<b>9897</b>	Luu Family Corp.	CA	0	4/26/00 - 10/2/00	29.41%
<b>9965</b>	Eberly Poultry Inc.	PA	2	4/29/04 -11/5/04	56.86%
<b>12432</b>	Medeiros Farms, Inc.	HI	2	3/22/05- 12/5/05	49.02%
				6/2/99 - 1/3/00	33.33%
<b>12434</b>	Pacific Poultry Co., Ltd.	HI	3	3/17/03 - 7/23/03	29.41%
				10/9/03 - 4/16/04	37.25%
<b>13369</b>	George's Processing, Inc.	MO	7	7/26/05- 10/17/05	50.98%
				6/22/98 - 3/26/01	43.14%
<b>13485</b>	Pilgrim's Pride Corp.	LA	4	10/2/01 - 2/18/02	31.37%
				7/6/04 - 9/21/04	37.25%
<b>15724</b>	Case Farms of Ohio, Inc.	OH	6	1/3/02 - 4/4/02	41.18%
				8/26/02 - 11/7/02	52.94%
<b>17340</b>	Pilgrim's Pride Corp.	KY	4	3/2/98 - 11/30/99	25.49%
<b>17500</b>	Gold Kist Inc.	AL	8	3/15/05 - 5/27/05	80.39%
				3/27/03/- 6/13/03	45.01%
<b>18414</b>	M.B.Consultant LTD.	NY	1 (two sets appear to be missing from the database)	4/14/04 - 6/2/04	Set stopped before completion
				10/19/04 - 1/24/05	25.49%
				3/2/99 - 2/8/00	43.14%
<b>18739</b>	Cal Fresh	CA	0 (one set appears to be missing from the database)	4/13/00 - 12/7/00	39.22%
				1/10/05 - 4/18/05	33.33%
<b>18927</b>	Spring Prairie Hutterian Breth	MN	0	12/5/00 - 9/6/05	25.49%
				1/2/01 - 4/1/02	43.14%
<b>18978</b>	Misty Knoll Farm	VT	1	4/29/02 -7/21/03	35.29%
				12/1/03 - 9/7/04	Set stopped before completion
<b>19014</b>	Yee Tung, Inc.	NJ	0	3/27/01 - 9/7/01	56.86%
<b>19128</b>	Case Farms of NC, Inc.	NC	3	10/13/99 - 1/3/00	27.45%
				7/21/05 - 10/3/05	29.41%
<b>19514</b>	Tyson Foods, Inc.	KY	6	7/6/04 - 10/5/04	58.82%
				3/5/99 - 6/3/99	33.33%
				3/5/01 - 5/31/01	43.14%
				7/9/01 - 10/15/01	33.33%
<b>19865</b>	House of Raeford Farms of LA	LA	3	8/14/02 - 10/23/02	Set stopped before completion
				2/11/04 - 4/22/04	47.06%
				7/12/04 -9/27/04	25.49%
<b>20138</b>	Bo-Bo Poultry Market, Inc.	NY	0	3/8/99 - 7/1/99	70.59%
				11/3/99 - 3/9/00	43.14%

<b>20251</b>	Tecumseh Poultry	NE	3	11/8/00 - 3/12/01	31.37%
				4/16/03 - 7/2/03	25.49%
				4/26/05 - 7/15/05	35.29%
<b>20322</b>	Charoen Pokphand USA- Inc.**	AL	5	1/7/02 - 4/8/02	37.25%
				6/17/02 - 9/9/02	25.49%
<b>20446</b>	Central IL Poultry Processing	IL	0	7/27/05- 10/25/05	43.14%
<b>20538</b>	Grower's Choice	NC	0 (one set appears to be missing from the database)	11/7/00 - 5/7/02	74.51%
				2/9/05 - 6/28/05	31.37%
<b>20589</b>	Not Listed at Agency Website		1	10/31/01 - 6/11/02	27.45%
<b>20604</b>	Gerber's Poultry, Inc.	OH	3	7/7/04 - 9/17/04	29.41%
<b>20979</b>	Simmons Food, Inc.	AR	7	11/29/00 - 3/15/01	29.41%
				5/1/01 - 7/20/01	25.49%
<b>27425</b>	G and G Poultry Inc.	PA	0	12/20/04 -5/2/05	29.41%
<b>31567</b>	Productos Aviolas Del Sur Inc.	PR	1	9/8/04 -12/6/04	52.94%

\*\* This plant was sold to Equity Group Eufaula Div. in 2004.