

EO 10-20 MHS
10/12/06



Kraft Foods

4 October 2006

Catherine Witherspoon
Executive Officer
California Air Resource Board
1011 I Street
Sacramento, CA 95814

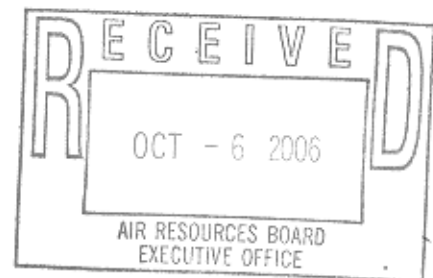
Dear Ms. Witherspoon,

As one of the leading food companies worldwide, quality and consumer safety is always Kraft's top priority. Kraft operates a number of food manufacturing facilities in California. The control of microorganisms that may impact the quality or safety of our products in our manufacturing environments is a key strategy within each of these facilities. I have outlined below the potential negative impact the current proposed regulation on VOC would have on our industry. Currently, Kraft and other food manufacturers utilize a product that would be eliminated by the proposed VOC regulation. Its elimination would remove a valuable tool from our quality and food safety toolbox.

The proposal to limit equipment sanitizers to 1% alcohol would have significant implications for our plants' microbiological environmental control programs. As a sanitizer, 1% alcohol would be ineffective. Since Alpet D-2, which is 58% alcohol, is the only "dry" sanitizer currently available, we would be forced to switch to a "wet" sanitizer that would introduce additional moisture into our manufacturing environment. Adding moisture to the environment is contrary to a good microbiological control strategy during operations. The additional moisture can be a contributing factor to the movement of microorganisms from one area to another. As a key member of the food industry, Kraft would urge you to grant an exemption to alcohol based sanitizers as this current proposal will be a step backward in our efforts to effectively control microorganisms in the manufacturing environment.

Sincerely,

Joe Stout
Director of Sanitation



c: Mr. Mallory -California Air Resource Board