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State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711



November 9, 2012

Gene Bridges
Patrick Cudahy
1 Sweet Applewood Lane
Cudahy, WI 53110

Subject: Welcome to Green Tier

Dear Gene:

Congratulations! We are glad to welcome you into Green Tier. You join a group of companies who are not only committed to superior environmental performance but also to superior economic performance.

In recognizing your past accomplishments and future commitments we promise to work towards promoting and recognizing your facility for taking the lead in environmental protection while assuring economic stability and growth. We are committed to publicizing Patrick Cudahy as a Green Tier participant on the DNR website. Undoubtedly, there will be other opportunities to bring the attention of your accomplishments to the forefront, and we hope to assist you in any manner possible in doing so as a Green Tier partner.

Ashok Singh has been assigned as your single point of contact. He can be reached at 414.263.8571 or at Ashok.singh@wisconsin.gov. Please contact Ashok with any questions concerning communications, required approvals, or technical assistance you may need. For your convenience the attached guidance outlines your benefits and important dates that affect your participation.

On behalf of the Wisconsin Department of Natural Resources, I am proud to extend this welcome to you. We are committed to working with you to build a customized relationship under the Green Tier Program. I am excited to embark on our new relationship and my staff is ready to assist as your business grows.

Sincerely,

/s/ Cathy Stepp

Cathy Stepp
Secretary

Attachments: Green Tier Commitment Outline
 Green Tier Logo Files and Guidance CD

Green Tier Commitment Outline for Smithfield Packaged Meats Corp. – Cudahy, WI

Approval Date – November 9, 2012

Commitment Outline Updated: 02/20/2020

The updates since participation started are:

- Change of project coordinator
- Change of company name
- Change of SPOC
- Updated general content, format and links

I. Environmental Management Systems (EMS) & Audit Requirements

Your EMS must either be ISO-certified, or you must demonstrate that it is functionally equivalent. For information on how to demonstrate the functional equivalency of your EMS, please see: <https://dnr.wi.gov/files/PDF/pubs/co/CO503.pdf>

You have supplied us with a copy of your ISO 14001 certification, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **April 2, 2013** and every year after that, you must perform an environmental management system audit. The department recommends that your first audit be completed by a DNR-approved outside environmental auditor.
- B. On or before, **April 2, 2016** and every third year, this audit **must** be completed by a DNR-approved outside EMS auditor. The list of approved auditors can be found at: <https://dnr.wi.gov/topic/GreenTier/Auditors.html>

II. Provide an Annual Report

- A. **Annual Report Due Date** - We have mutually agreed that the deadline for your Green Tier annual report is **October 15, 2013** and annually thereafter. (Please feel free to discuss alternative reporting dates with your Project Coordinator, JenniferA.Birkholz@Wisconsin.gov should your needs change.)
- B. **Reporting on Environmental Performance Commitments:** Your first report should follow the annual report instructions provided below and should provide data on your progress toward meeting your environmental performance commitments laid out in your Green Tier application or your previous year's Green Tier annual report.
- C. **Annually**, you will need to report progress on the commitments that you have made. For more details about annual reports and metrics, see the annual report instructions provided on the website; <https://dnr.wi.gov/topic/GreenTier/ReportInstructions.html>
- D. Please submit Green Tier Annual Reports to: GreenTier@Wisconsin.gov and your Single Point of Contact (SPOC), Susan.Eichelkraut@Wisconsin.gov.

III. Work toward Superior Environmental Performance

Implement environmental improvements that aim to achieve Superior Environmental Performance as defined in Green Tier law. This means environmental performance that results in measurable or discernible improvement in the quality of the air, water, land, or natural resources, or in the protection of the environment, beyond that which is achieved under environmental requirements. More information on Superior Environmental Performance can be found here:

<https://dnr.wi.gov/topic/GreenTier/SuperiorEnvironmentalPerformance.html>

IV. Green Tier - Tier 1 – DNR Commitments

- A. **Single Point of Contact (SPOC):** Your single point of contact or SPOC is your liaison to the department, answering your questions or making connections within DNR or with other experts. Your SPOC is: Susan Eichelkraut - DNR, Phone 414-263-8682, Susan.Eichelkraut@Wisconsin.gov
- B. **Green Tier Logo:** Green Tier participants may use the Green Tier logo on stationery, promotional and educational materials related to your facility. Logo files as well as the Green Tier Style Guide with additional guidelines and information are available online at: <https://wi-dnr.widencollective.com/portals/nkc57xuv/GreenTierBranding>. Your Project Coordinator can provide you with the current access code.
- C. **Recognition:** Along with the certificate of recognition, the department will host a [participant web page](#) for easy reference. Participants should provide information and pictures on their environmental efforts to populate the webpage. We will also promote your successes throughout your tenure in Green Tier using a variety of DNR communication channels.
- D. **Project Coordinators:** You should also feel free to contact your Project Coordinator for Green Tier specific information. Project Coordinators provide support to SPOCs and participants providing reminders on Green Tier requirement dates and by promoting a participant's successes. Your project coordinator is: Jenni Birkholz, Phone 608-266-8226, Cell 608-514-2182, JenniferA.Birkholz@Wisconsin.gov.
- E. **Minimum Inspection Frequency:** Because you have implemented an EMS, you are entitled to inspections at the lowest frequency permitted by the programs under law. The department will work with you to determine how this will work for you.
- F. **Deferred Civil Action:** You are entitled to Deferred Civil Enforcement as described in statutes (299.83(6m)(d)). If you discover a violation of an existing environmental requirement, you are entitled to protection from any civil penalties that the department might otherwise impose if you:
 - 1. Notify the department
 - 2. Provide a corrective action plan and documentation of your Environmental Management System (EMS) adjustments that ensure the violation will not happen again, and
 - 3. Correct the violations within 90 days

Notice: Collection of this information is authorized under s. 298.83 Wis. Stat. Participation in Green Tier and completion of this form are voluntary. Personal information collected on this form, including such data as your name, address, phone number, etc., will be used in the implementation of Green Tier and will be made broadly available under the Green Tier program. Information will also be made accessible to requesters under Wisconsin's Public Records Law (ss. 19.32 - 19.39, Wis. Stats.). If you need to request confidential treatment of any information in order to protect a trade secret, please contact a DNR representative prior to submitting this form. Applications must be considered complete by the DNR in order to be processed. For complete application instructions, see "Green Tier Application Instructions," publication number CO-501.

This application is for... (check one): Tier 1 Tier 2 (attach Letter of Intent to this form)

I. Applicant Information

Contact Name	Carter Hanson		Title	Environmental Coordinator				
Street Address	1 Sweet Applewood Lane		City	Cudahy	State	WI	ZIP Code	53110-0000
Telephone Number	(414) 918-3228		Fax Number			E-mail Address	carter.hanson@mlj.com	

II. Facility Information

Facility Name	Patrick Cudahy LLC		County	Milwaukee				
Street Address	1 Sweet Applewood Lane		City	Cudahy	State	WI	ZIP Code	53110-0000
Mailing Address	1 Sweet Applewood Lane		City	Cudahy	State	WI	ZIP Code	53110-0000

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity.

241008670

III. Scope of Green Tier Participation (check one)

- This application covers all activities at the facility listed in Section II.
- This application covers all activities at more than one facility. For each facility to be covered under this application provide the information from Section II on a separate page labeled **Attachment 1**.
- This application **does not** cover all activities at every covered facility. Please describe the exact scope of activities and facilities to be covered in the program on a separate page labeled **Attachment 1**.

IV. Environmental Performance

Please provide the following information on a separate page labeled **Attachment 2**. Refer to the *Application Instructions* for definitions of environmental performance and superior environmental performance.

Tier 1 Applicants:

- Describe your past and current environmental performance with respect to each covered facility or activity included in this application. Within this attachment establish a baseline date against which future progress can be measured.
- Describe your future plans for enhancing the environment with respect to the same facilities/activities.

Tier 2 Applicants:

- Provide information demonstrating your record of superior environmental performance. Within this attachment establish a baseline date against which future progress can be measured.
- Describe the measures you propose to take to maintain and improve your superior environmental performance.

V. Environmental Management System (EMS)

- a. Have you implemented an EMS that is certified to the ISO 14001 standard? Yes No (circle one)
- b. Have you implemented an EMS that is functionally equivalent to ISO 14001? Yes No (circle one)

If you circled "No" for both questions, you are not eligible for Tier 2. Please proceed to Section VI only if you are applying for Tier 1.

If you circled "Yes" for either question, please provide a copy of the following documents labeled as **Attachment 3**:

- Proof of ISO 14001 certification OR functional equivalence (refer to *Application Instructions* for details)
- Environmental policy statement and scope statement
- Documented objectives and targets for the covered facilities/activities

VI. Public Notice/Stakeholder Identification

Please provide in a separate document labeled **Attachment 4** a list of stakeholders whom you know or expect will have a strong interest in your Green Tier application, as well as contact information for those stakeholders. This information will help DNR expedite the processing of your application. Tier 2 applicants must provide additional information about stakeholder involvement in a Letter of Intent. Refer to *Application Instructions* for details.

VII. Enforcement Record

Please review the Enforcement Record requirements described in the *Application Instructions* very carefully, and then check the appropriate box:

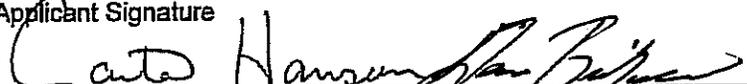
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

If a waiver is requested, please provide information describing any requirements not met and a justification for the waiver request on a separate page labeled **Attachment 5**. Note that waivers will be granted only in exceptional circumstances.

VIII. Tier 1 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Implement, within one year of the date of this application, an EMS for each covered facility or activity that is certified to the ISO 14001 standard or is functionally equivalent to ISO 14001 as determined by DNR.
- Conduct annual EMS audits, with every 3rd EMS audit performed by a DNR-approved outside environmental auditor.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on progress towards meeting objectives related to improved environmental performance for aspects regulated under chs. 29 to 31, 160, or 280 to 299, Wis. Stats., unregulated environmental aspects, or voluntary actions to restore, enhance, or preserve natural resources.

Applicant Signature 	Date Signed 4/13/12
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IX. Tier 2 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Conduct annual EMS audits performed by a DNR-approved outside environmental auditor.
- Conduct or have another person conduct an annual audit of compliance with environmental requirements that are applicable to the facilities and activities covered under Green Tier.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on each compliance audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.

Applicant Signature	Date Signed
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X. For Department Use Only					
Date Received	Initials of Reviewer	Status	Date Returned to Applicant for Additional Information	Date Denied	Date Approved

2011 Patrick Cudahy Environmental & Sustainability Review

What Does PC Do?

- ISO14001 Certified
- ISO14001 is an internationally recognized environmental management system
- Requires plants to:
 - comply with the law,
 - continually minimize environmental footprint,
 - support from top management
- Verified by a 3rd party auditor

PC's 2011 Footprint

- Disposed of 1,457 tons of trash to landfill – down 549 tons (27%) from previous year.
- Used 347 MCF of Natural Gas – down 7 MCF (2%) from previous year.
- Used 50 MWH of Electricity – down 12 MWH (19%) from previous year.
- Installed Super Efficient LED Lighting in new Dry Storage Building.
- PC received several Smithfield Foods Recognition Awards its 2011 efforts to reduce waste generation, energy conservation and water use reduction.
- Recycled 83 tons of plastics in 2011.
- Continue to chemically treat wastewater to reduce our discharges of BOD by 40% and TSS by 50%
- Coordinating with local Indian tribe (Potawatomi) on taking biogas generating wastes for their new Energy Generating System scheduled to come online in Sept 2013.

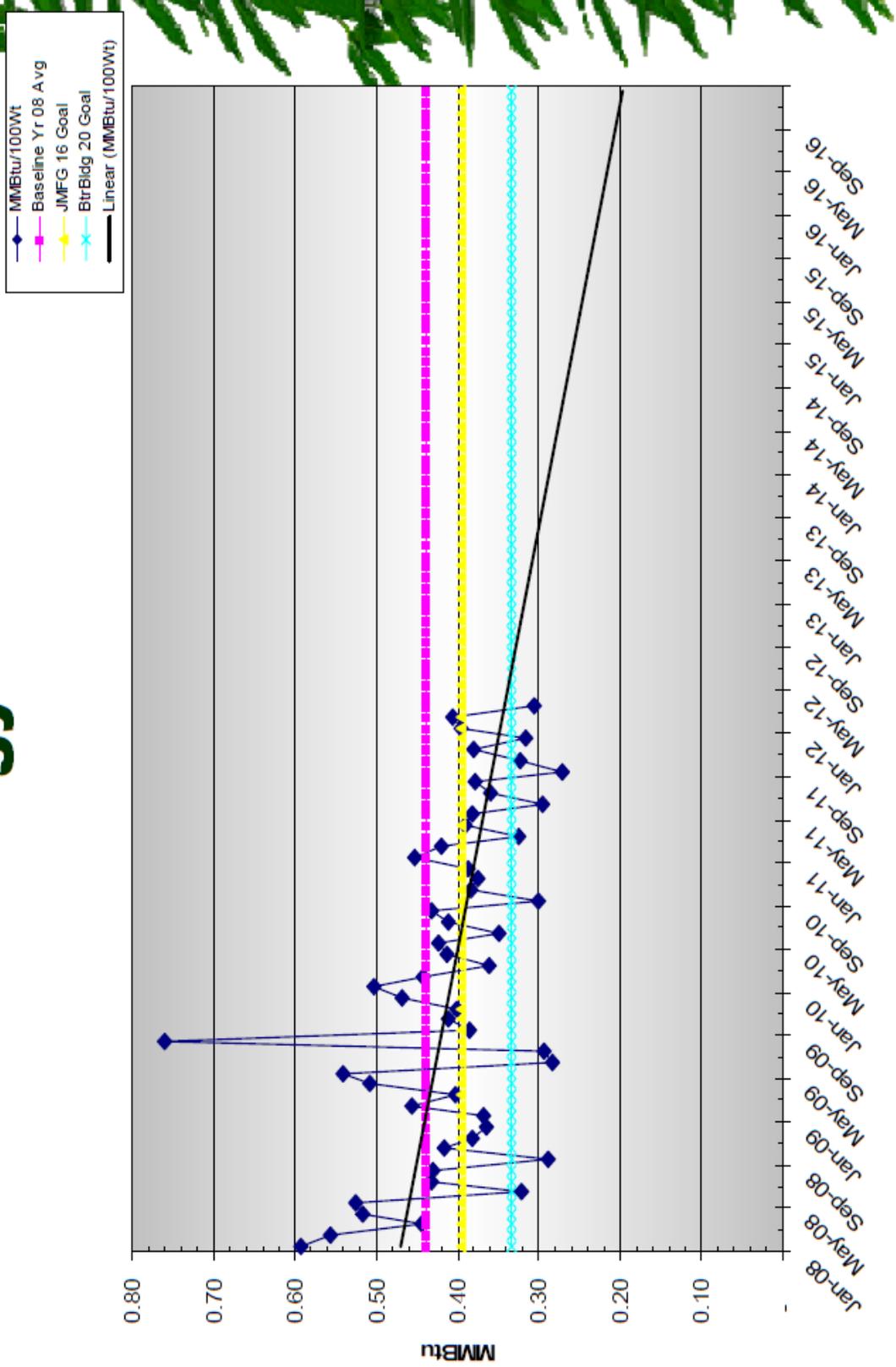
PCI's 2011 Environmental Improvement Plan

- Installed burner management systems to reduce natural gas usage by 4% and decrease pollution at the same time.
- Replaced steam water heater with direct fired natural gas water heater to save 20% on energy.
- We're planning to replace more metal halide light fixtures with LEDs to save on electricity during 2012.
- We continue to evaluate feasibility of taking our remaining landfill wastes and converting them into alternative fuels to be used by other companies for energy purposes (Greenwood Fuels, Inc.)
- In 2011, PC was recognized by US Department of Energy for its progress in the Save Energy Now Leaders Program by reducing its energy usage by 15% during its first year in the program.

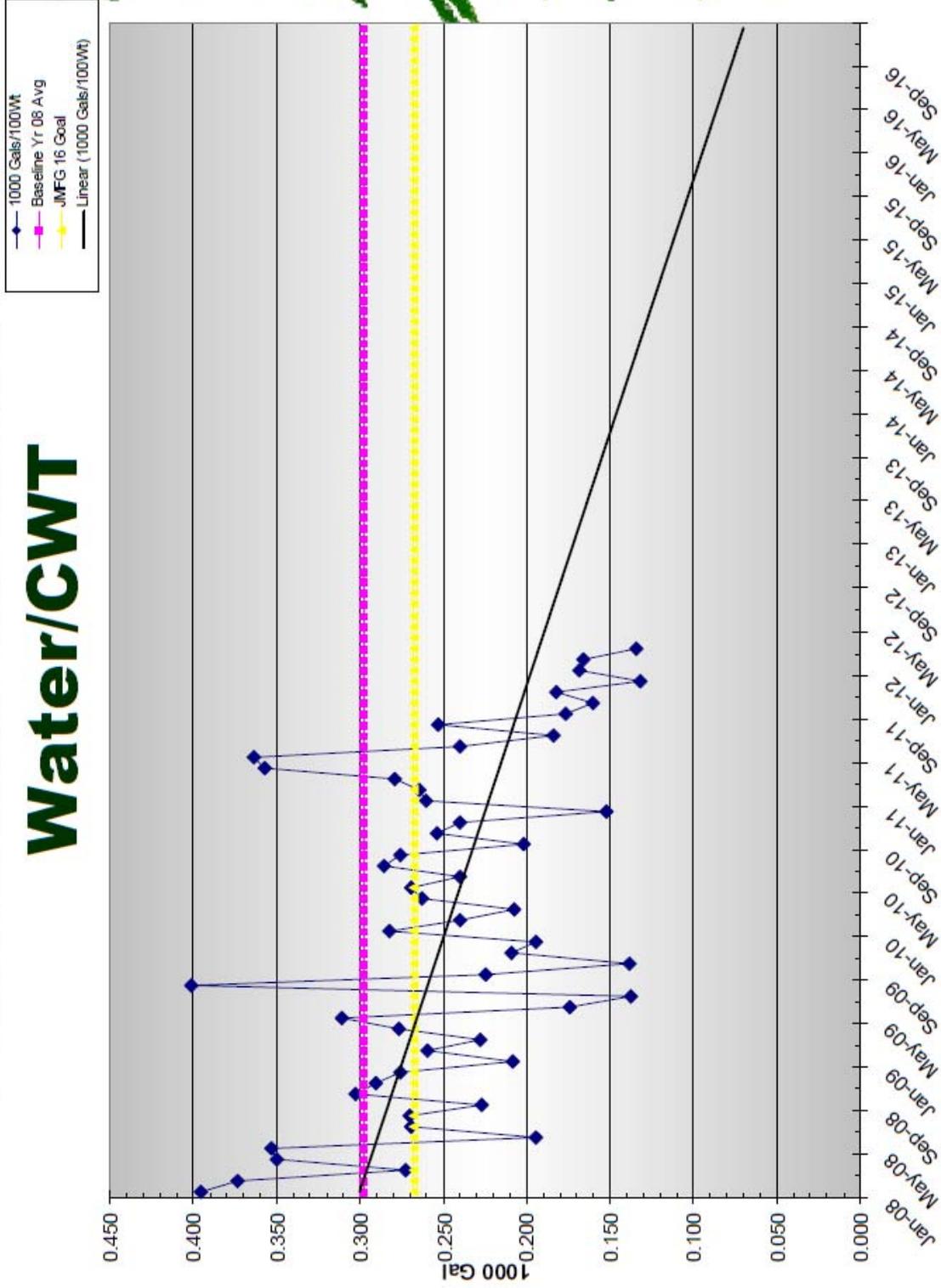
PCI's Environmental Targets

1. Zero landfill
2. Reduce Energy Use by 25% by 2020.
3. Reduce Water Use by 10% by 2016.
4. Reduce toxic chemical usage wherever we can.

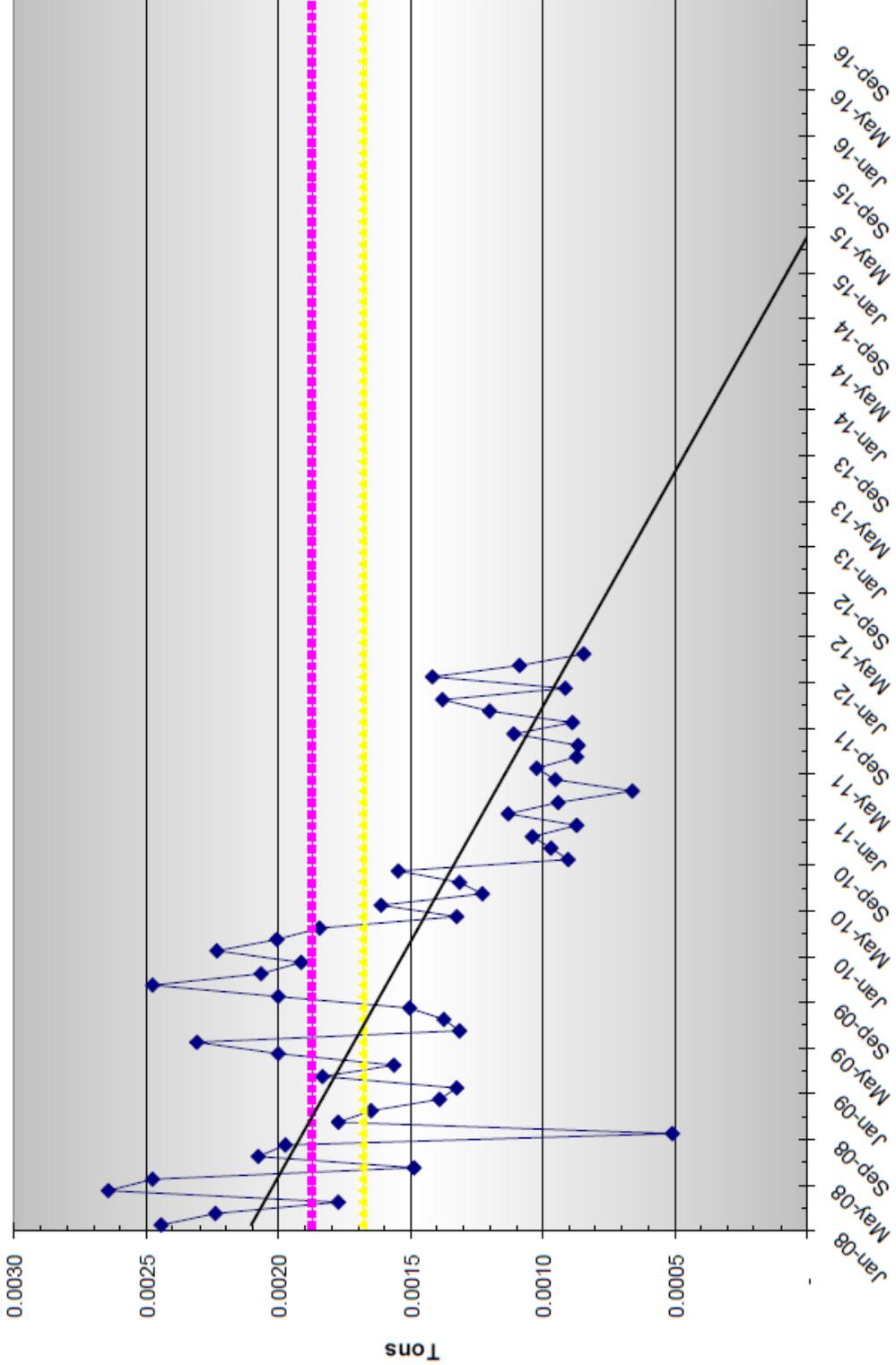
Proof We are Improving: Environmental Metrics - Energy/CWT



Proof We are Improving: Environmental Metrics - Water/CWT



Proof We are Improving: Environmental Metrics – Landfill Waste/CWT



789 North Dixboro Road, Ann Arbor, Michigan 48105
(888) NSF-9000

Certificate of Registration

This certifies that the Environmental Management System of

Smithfield Foods, Inc.

Patrick Cudahy, Inc.
One Sweet Apple-Wood Lane
Cudahy, Wisconsin, 53110, United States

has been assessed by NSF-ISR and found to be in conformance to the following standard(s):

ISO 14001:2004

Scope of Registration:

All United States Smithfield Foods, Inc. facilities including meat production, slaughter, further food processing facilities and production support services.

Exclusions: None

Industrial Classification:

IAF - EMS: 25
SIC: 2013



Certificate Number: 2Y491-EM3-2Y507
Certificate Issue Date: 29-OCT-2010
Registration Date: 28-OCT-2010
Expiration Date *: 27-OCT-2013


James A. Cuff, General
Manager NSF-ISR, Ltd.