December 18, 1999

FDA/Dockets Mgmt Branch (HFA 305)
5630 Fishers Lane
Room 1061
Rockville MD 20852

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Docket No. 97N-0074

"While unmolted hens usually have to ingest about 50,000 Salmonella cells to become infected, molted hens need fewer than ten." - World Poultry Vol 12, No. 9 (1996)

Between 1985 and 1998 "over three-quarters of Salmonella Enteritidis outbreaks were linked to eggs, according to the Centers for Disease Control and Prevention." Causes cited in the report are "heavy rodent populations" and "forced molting."

Starving hens to manipulate egg production - the practice known as forced or induced molting - causes hens' immune systems to break down under the stress

Feed withdrawal from turkeys and chickens "has long been shown to markedly increase contamination with both Salmonella and Campylobacter. The birds look for other food sources during feed withdrawal, eating litter (the contaminated material the birds are forced to live in) when they are hungry." Since hens being starved in their cages do not have access to litter "they are driven to "pluck and consume" cage mates contaminated feathers (Avian Diseases 1995).

Sincerely for the Animals,

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97N-0074

C206

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