



Poultry Council

PennAg Industries Association

Northwoods Office Center
2215 Forest Hills Dr., Suite 39
Harrisburg, PA 17112-1099
Ph: 717-651-5920
Fx: 717-651-5926
E-Mail: jshirk@pennag.com

August 9, 2000

FDA Dockets Management Branch
5630 Fishers Lane
Room 1061
Rockville, MD 20852

1990 00 AUG 14 19:20

Subject: Comments on FDA Docket No. 00N-0504 and Current Thinking Meeting held July 31, 2000 titled "Public Meeting on Eggs – Current thinking on the National Standards for Egg Safety."

The PennAg Poultry Council, which represents the poultry industry in Pennsylvania, strongly endorses the general approach being proposed to reduce the risk associated with SE in eggs. We would make the following suggestions for consideration in the national program.

- 1) Regarding the proposal that all feed be Salmonella negative, we make the following comments:
 - a. there is no good evidence to show that feed is a significant source of SE
 - b. at the present time requiring a salmonella free feed (as contrasted with a SE free feed) would be prohibitively expensive for commercial egg production. Pelleting of layer rations presents nutritional issues (as excessive consumption) which can be difficult to address. The use of formaldehyde-propionic treatment would be prohibitively expensive for commercial layers as well as raise questions of long term food safety.
 - c. We would recommend that as in the NPIP program for breeders, the recommendation would be that feed containing animal protein be derived only from rendering plants participating in the Animal Protein Products Industry (APPI) Salmonella reduction program.
- 2) Regarding the proposal to require cleaning and disinfecting (C&D) of a positive house before placement of the next flock:
 - a. We support the requirement for C&D before another flock is placed if the prior flock environment was SE positive. If details regarding C&D are to be a part of the regulations, we believe the requirement should allow for flexibility in the

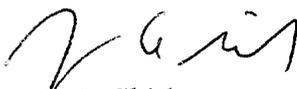
00N-0504

C 27

C&D procedure. If a specific procedure were to be outlined we would suggest wording such as "Cleaning and disinfecting will be done by such a method that has been shown by scientific study to achieve an acceptable reduction and/or elimination of residual SE."

- 3) Regarding and specific temperature requirement for on-farm refrigeration of eggs:
 - a. We believe the 36-hour proposal is realistic (36 hours or less between time of lay and refrigeration). When eggs are refrigerated we recommend that the requirement for this on-farm refrigeration be at a temperature no greater than 55 degrees Fahrenheit. The reasons for this are:
 - I. There is ample evidence that any low level of SE within a naturally infected egg will not undergo significant multiplication until the albumen begins to degrade and the bacteriostatic/bacteriocidal substances in the albumen (as lysozyme) lose their effectiveness. Even at room temperature this may take several weeks.
 - II. The cost involved with remodeling and operating on-farm coolers to maintain a 45-degree ambient temperature would not show a reasonable cost:benefit ratio.
 - III. Eggs are generally held in on-farm coolers for a relatively short period of time and then will be under the 45 degree Fahrenheit requirement for transport and post-processing
 - b. We would recommend an on-farm holding temperature of no greater than 55 degrees Fahrenheit providing the eggs were not to be stored on the farm for more than 4 days.
- 4) Regarding the proposal for labeling eggs with a 30 day expiration date from date of lay:
 - a. We believe that in some situations this is much too restrictive. Because eggs will be refrigerated and transported at 45 degrees Fahrenheit, we would recommend that if an expiration date is to be mandated, it should be 30 days from the date of processing. The prohibition of repackaging for retail sale would remain, as would the temperature requirements. It is unlikely this time would significantly increase the risk of SE given the fact that the eggs will be under refrigeration.

Thank you for consideration of these comments.


James A. Shirk
PennAg Poultry Council


Dr. David Kradel
PennAg Technical Advisor