

## HAWAII EGG PRODUCERS COOPERATIVE

841 Bishop Street, Suite 850

Honolulu, Hawaii 96813

(808) 522-5133

1997

AUG 17 1997

August 10, 2000

USDA/FSIS Docket Clerk  
300 12th Street SW., rm. 102  
Cotton Annex  
Washington, D.C. 20250-3700

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

**Re: FSIS, Docket No. 98-045N4 and FDA, Docket No. 00N0504 – “Current Thinking Papers on the National Standards for Egg Safety”**

Dear Sir or Madame:

The Hawaii Egg Producers Cooperative is a cooperative representing the egg producers in the State of Hawaii. Hawaii production is more than 148 million eggs per year with a layer population of 580,000. The average number of layers per farm is 65,000.

Hawaii residents have a decided preference for fresh Hawaii produced eggs as indicated by the vast majority market share of local product.

Production costs are high, probably the highest in the country. Hawaii is a pocket market and eggs are not exported out of the State. Hawaii's production does not afford the industry with an egg breaking or pasteurization facility. No egg products are manufactured. Hawaii's industry does not re-process and repack outdated eggs. No chicks for egg production are hatched in our State. All chicks are air-shipped from the West Coast. There are only two slaughter facilities on two of eight islands, and one very small rendering plant on Oahu. All packing materials and feed are imported from the continental United States by ocean freight.

The Hawaii egg producers have limited alternatives. Eggs that cannot be sold would have to be destroyed. It is cost prohibitive to ship the eggs to breaker plants in California or elsewhere in the continental U.S.

The high cost and market isolation of the Hawaii egg industry, although healthy and vital to Hawaii consumers, is nonetheless economically fragile. The strategies set forth in the “Current Thinking Papers on the National Standard for Eggs Safety” would likely devastate the majority of our industry because of the suggested testing programs and no alternatives available for the diversion of eggs. Our average producer will not be able to absorb the new costs because economy of scale could result in a 15 – 30 percent increase in operating expenses, or 12 – 24 cents per dozen.

We believe the components for a SE reduction program are adequately addressed by our Hawaii Egg Quality Assurance Plan. Our industry uses SE controlled feed and chicks from SE-monitored program as general practices.

The Hawaii egg industry, the State of Hawaii Department of Health and State Department of Agriculture have effectively been able to regulate Hawaii egg production and marketing. Hawaii regulators are acquainted with local custom, practice and requirements and should continue regulatory oversight. We believe the “Current Thinking Papers on the National Standards for Egg Safety” do not provide Hawaii egg

00N-05-04

C28

producers/processors a "level playing field" with the continental U.S. industry. Hawaii producers participating in the Hawaii Egg Quality Assurance Plan should not be economical devastated with the new costs and procedures of the proposed National Standard for Egg Safety when the eggs they produce is SE negative.

We hereby comment on specific provisions of the "Current Thinking Papers on the National Standards for Egg Safety".

**FOOD AND DRUG ADMINISTRATION  
ON-FARM, PACKER/PROCESSOR, AND RETAIL STANDARDS  
FOR REDUCING *SALMONELLA ENTERITIDIS* IN SHELL EGGS**

**On-Farm Standards**

Coverage

Producers (other than those who sell all of their eggs directly to consumers (e.g., roadside stand operators) who provide eggs for the table egg market must comply with all requirements (Strategy I). Strategy I include the diversion of shell eggs to pasteurization. There are no egg breaking and pasteurization facilities in the State of Hawaii. Eggs that cannot be sold would have to be destroyed because it is cost prohibitive to ship the eggs to breaker plants to the mainland United States. The West Coast does not possess adequate number of breaker plants for West Coast producers. The Hawaii Egg Quality Assurance Plan allows Hawaii producers to work with local officials from the State Agriculture and State Health departments to divert eggs to a non-table egg use or depopulate the flock.

Verification of the SE Risk Reduction Plan

For operations with a traceback history, chick papers and housing should be environmentally tested before restocking pullets and layers. SE environmental testing should be conducted 2 weeks before depopulation.

For operations with no traceback history and enrolled in a State Egg Quality Assurance Plan, those operations should be required to conduct SE environmental testing two weeks before depopulation.

Multiple testing and condemnation of flocks solely for one environmental test result would have devastating impacts on the local industry and state economy. Hawaii is unable to replace chicks/pullets at any time different from the usual lay cycle. There is no commercial hatchery for egg-laying chicks in Hawaii. All chicks are ordered 5 months to one year in advance from out-of-state. All chicks are air-flown at one day of age. There are only two slaughter facilities on two of eight islands in our state, and one very small rendering plant on the Island of Oahu. Therefore, we have inadequate facilities to accommodate the disposal of eggs and flocks that result from the multiple environmental testing plan described in the Current Thinking Papers. **We do not know if the County landfills can accommodate the depopulation of flocks and diversion of eggs.**

We strongly believe our state quality assurance plan already contains the major components of a SE Risk Reduction Plan. The Hawaii Egg Quality Assurance Plan can effectively regulate Hawaii egg production and marketing given the limited alternatives unique to Hawaii. The Hawaii State Department of Health closely monitors the occurrence of SE and other food borne illness. Our state egg quality assurance plan should not be replaced by the National Standards for Egg Safety.

**FOOD SAFETY AND INSPECTION SERVICE  
STANDARDS FOR SHELL EGG PACKERS AND  
EGG PRODUCTS PROCESSING ESTABLISHMENTS**

### Shell Egg Packer and Egg Products Processor Standards

Requirements for shell egg packers and egg products processors may include:

Sanitation SOP's, Hazard Analysis and HACCP Plan

When packing shell eggs for the consumer, the use of only new primary packing materials will increase marketing costs by 10-15 percent. Since no primary packing materials are produced in Hawaii, all materials must be shipped by ocean freight. The availability of adequate packing materials will be difficult. Any transportation and labor disputes at the West Coast and Hawaii ports significantly restrict supply.

It is estimated that 20 percent of packing materials are reused for direct sale to the consumer at the producer-packer's own facility. Producer-packers only reuse their own primary packing materials that are clean and dry. Hawaii egg industry requests that this practice continue because of the geographic and transportation constraints unique to Hawaii's chain of islands.

#### FOOD AND DRUG ADMINISTRATION RETAIL STANDARDS (USING 1999 FOOD CODE PROVISIONS)

The focus is still at the farm level when there should be equal surveillance and regulation of foodservice establishments to meet continuous farm-to-table approach. Foodservice handlers should complete training on risk reduction for food preparation and handling, just as each production facility must successfully complete training on SE risk reduction measures for egg production.

In conclusion, we strongly urge FDA and USDA/FSIS to reconsider our comments stated above and of April 14, 2000. We believe the "Current Thinking Papers" do not meet the following goals of the Egg Safety National Standards to: (1) Be cost effective and attentive to small business, and (2) Recognize regional differences of agriculture practices and ensure standards allow for these differences. We believe Hawaii egg producers/processors are not given a "level playing field" with the continental U.S. industry. The "Current Thinking Papers" presents a plan that is better suited for egg production in the Central and Eastern regions of the U.S. Though Hawaii egg producers have flocks of more than 3,000 layers, all egg operations would be recognized by the Small Business Administration as small businesses according to SIC code. Our average producer will not be able to absorb the new costs because economy of scale could result in 15-30 percent increase in operating expenses. Hawaii's entire egg industry is comprised of 580,000 layers, which is equal to or less than a single production facility in major egg producing states.

We strongly urge where there are Federal agreed upon standards and procedures with State egg quality assurance plans, those states with existing local egg quality assurance plans be given regulatory oversight. States that do not have egg quality assurance programs should follow the Federal program.

Sincerely,



Phyllis S. Shimabukuro-Gciser  
President

From **[Redacted]**  
 Date **8/11/00**

Sender's Name **Hawaii Egg Producers Coop** Phone **808 668-2359**

Company \_\_\_\_\_

Address **841 Bishop Street, Suite 850** Dept./Floor/Suite/Room \_\_\_\_\_

City **Honolulu** State **HI** ZIP **96813**

Your Internal Billing Reference \_\_\_\_\_

To Recipient's Name **FDA/Dockets Management Branch (HFA 305)**

Company \_\_\_\_\_

Address **5630 Fishers Lane** We cannot deliver to P.O. boxes or P.O. ZIP codes \_\_\_\_\_

**Room 1061** Dept./Room/Suite/Room \_\_\_\_\_

City **Rockville** State **MD** ZIP **20852**



**4a Express Package Service**  
 FedEx Priority Overnight (Next business morning)  FedEx Standard Overnight (Next business afternoon)  FedEx First Overnight (Earliest next business morning delivery to select locations)  
 FedEx 2Day\* (Second business day)  FedEx Express Saver\* (Third business day)  
 \*FedEx Envelope/Letter Rate not available. Minimum charge: One-pound rate.

**4b Express Freight Service**  
 FedEx 1Day Freight\* (Next business day)  FedEx 2Day Freight (Second business day)  FedEx 3Day Freight (Third business day)  
 \*Call for Confirmation.

**5 Packaging**  
 FedEx Envelope/Letter\*  FedEx Pak\*  Other Pkg. (Includes FedEx Box, FedEx Tube, and customer pkg.)  
 \*Declared value limit \$500

**6 Special Handling** Include FedEx address in Section 3.  
 SATURDAY Delivery (Available for FedEx Priority Overnight and FedEx 2Day to select ZIP codes)  SUNDAY Delivery (Available for FedEx Priority Overnight to select ZIP codes)  HOLD Weekday at FedEx Location (Not available with FedEx First Overnight)  HOLD Saturday at FedEx Location (Available for FedEx Priority Overnight and FedEx 2Day to select locations)  
 Does this shipment contain dangerous goods? One box must be checked.  
 No  Yes (As per attached Shipper's Declaration)  Yes (Shipper's Declaration not required)  Dry Ice (Dry Ice, 3 UN 1845 \_\_\_\_\_ x \_\_\_\_\_ kg)  
 Dangerous Goods cannot be shipped in FedEx packaging.  Cargo Aircraft Only

**7 Payment Bill to:** Enter FedEx Acct. No. or Credit Card No. **AMEX** Obtain Recip. Acct. No.  
 Sender Acct. No. in Section 1 will be billed.  Recipient  Third Party  Credit Card  Cash/Check

Total Packages	Total Weight	Total Declared Value†	Total Charges
		\$ .00	
			Credit Card Auth.

**8 Release Signature** Sign to authorize delivery without obtaining signature.

By signing you authorize us to deliver this shipment without obtaining a signature and agree to indemnify and hold us harmless from any resulting claims.  
**Questions? Call 1-800-Go-FedEx** (800-463-3339)  
 Visit our Web site at [www.fedex.com](http://www.fedex.com)  
 Rev. Date 8/99 • Part #154815 • ©1994-99 FedEx • PRINTED IN U.S.A. G8FE 6/00

**360**