



IN DEFENSE OF ANIMALS

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August 7, 2000

Dockets Management Branch  
Food and Drug Administration  
5630 Fishers Lane, Rm 1061  
Rockville, MD 20852

Docket No. 00N-0504

Re: Contamination of Eggs and the FDA Egg Safety Plan

In Defense of Animals appreciates the opportunity to offer written comment on the USDA proposal to reduce contamination, specifically of *Salmonella enteritidis* in eggs. IDA is a national, non-profit organization dedicated to promoting the rights of animals by defending their rights, welfare and habitats. We speak on behalf of our 70,000 US members and the billions of animals used by the egg industry.

We believe that in order for any plan for increasing egg safety to be effective, it must address the root causes of the problems leading to contamination. These are all traceable to conditions on modern factory farms where hens are severely overcrowded in battery cages.

It is not unusual for a battery hen house to have several hundred thousand birds per house. One "farm" may have dozens of houses. Egg farms exist which can have anywhere from a half million to several million birds.

All husbandry efforts on such "farms" must of necessity be done by automation. These birds are rarely, if ever, tended by a human hand. The cleaning, watering, and feeding of these animals takes place by means of a conveyor system. The conveyor belt, which is designed to sweep away feces, wraps around so that the excrement from the floor of one level above becomes the ceiling for the floor below. Because cages are stacked in tiers, excrement continually drops down to the level below. The result is that the hens spend their lives steeped in manure and ammonia fumes from urine.

This creates an environment of intense and unwholesome microbial growth. Even a healthy bird in such circumstances would be challenged to remain disease-free. But these birds are not healthy. They suffer from musculo-skeletal deformities from living in crowded quarters which prohibit the normal range of motion, including normal wingspan. They develop deformities of their feet from living on a wire surface. They develop painful oviduct diseases such as prolapsed uteri and/or infections from a life of excessive egg production. Debeaking procedures performed early in the bird's life lead many to have difficulty with eating. Veterinarians and poultry specialists alike have documented that debeaking itself leads to chronic painful conditions.

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Hens are subjected to forced molting - a starvation practice that is considered a standard procedure by the US egg industry to manipulate egg laying. It involves the removal of ALL food from hens used for commercial egg production for 5 to 14 days (typically 10 to 14 days) to manipulate the hormones responsible for egg production and feather cover. Forced molting is designed to force the birds to lose 25 to 30 percent of their body weight and to shock their system into another round of egg production. It results in a greater yield of eggs produced, but at enormous expense to the bird.

The modern day egg-laying hen is physiologically challenged to the point where her immune systems is severely compromised. These are the reasons that Salmonella enteritidis poisoning in eggs continues to grow yearly. Fifty years ago, or less, one could eat eggs raw. Today such a practice is unthinkable. It isn't that eggs themselves have undergone any process of transformation, but that modern agricultural practices have become incompatible with life.

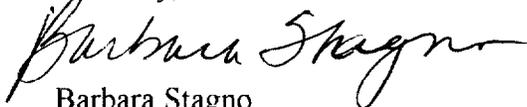
It is imperative that USDA and FDA seriously address this issue by ceasing to allow such practices to continue. The public looks to the government to ensure that the food supply is safe. They have a right to expect that those entrusted with oversight and regulation of safe food fulfill their mandate.

IDA joins other organizations, such as United Poultry Concerns and the Association of Veterinarians for Animal Rights, in demanding that practices such as forced molting be banned. The battery cage must also be banned, as has already been done in the United Kingdom. Reductions in overcrowding will greatly eliminate diseases caused by fecal contamination, stress and forced starvation.

Only when the conditions on egg farms have been improved to eliminate the degree of 1) filth and contamination, 2) stress induced by overcrowding and 3) suffering and illnesses imposed by practices which mutilate or starve chickens, will we see any improvement in the safety of eggs for human consumption. There will be no shortcuts. The laws of nature are firm. They will not bend for human benefit or cease to exist because they cost egg producers too much money to consider.

While the egg industry can choose to favor profits over food safety, government must not. We should like to point out that an increasingly informed public is aware that much of the food supply is contaminated and are altering their dietary choices accordingly.

Sincerely,



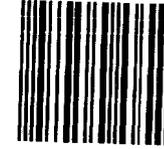
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