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August 3, 2000

Dockets Management Branch  
Food and Drug Administration  
300 12th Street, SW, Room 102  
Cotton Annex  
Washington, DC 20250-3700

**Docket No. 00N-0504**

Re: Contamination of Eggs

Dear Sir or Madame,

I understand that the President's Council on Food Safety has identified egg safety as a component of food safety that warrants immediate attention, and appreciate the opportunity to comment on the FDA's Egg Safety Action Plan.

To achieve the objective of eliminating the possibility of Salmonella Enteritidis infection of eggs, it is necessary that the cause of this disease be arrested. SE has been traced back to the way hens are kept and treated, as the conditions in which they are required to live and carry out their sole purpose of egg production causes unbearable stress on their immune systems. This is brought about by: overcrowding in battery cages that does not allow them to stretch, let alone exercise; unsanitary conditions including diseased air they spend their entire lives breathing and bearing the presence of fecal matter from other birds; and inhumane treatment such as debeaking, lack of support given by wire flooring and forced molting.

These are all primary causes that the plan at present does not address. While it may be unreasonable to expect the industry to change all of this soon, there is now doubt that the practice of force molting can immediately end, as this does not involve capital expenditure like acting upon the other causes mentioned above would.

Eggs will not be free of infection from Salmonella Enteritidis unless the hens laying them are too. Among the other actions that need to be taken to ensure that the egg industry raises healthy, unstressed hens, which will translate to the production of healthy eggs, please impose an immediate ban on Forced Molting.

Yours very truly,



Peter Fulda

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