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August 14, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket NO. 00N-0504

In response to the Food and Drug Administration's (FDA) comments on "Egg Safety From Production to Consumption: An Action Plan to Eliminate Salmonella Enteritidis Illnesses Due to Eggs," the Animal Welfare Institute submits the following comments.

The Administration is to be credited for recognizing the desperate need to improve egg safety and to reduce Salmonella Enteritidis illness.

A U.S. Department of Agriculture (USDA) Risk Assessment concluded that human Salmonella Enteritidis could be "reduced by 2.1 percent (6,300 cases per year in the United States) if forced molting were eliminated" (USDA Farm Animal Well-Being Task Group Meeting document, July 21, 1998). Shockingly, the FDA's response to the Egg Safety Plan does not even mention the primary causes of Salmonella Enteritidis in hens and eggs. Primary causes of Salmonella Enteritidis include overcrowding and forced molting. Laying hens that are overcrowded are debeaked, toe trimmed, deprived of exercise and their natural instincts to nest and dustbathe. Forced molting, a 5-14 day starvation period, suppresses the hens' immune systems and makes them, their eggs and humans susceptible to Salmonella infection.

Egg borne contamination threatens public health. If the FDA is truly concerned about ensuring egg safety from farm to table it would prohibit overcrowding and forced molting which are not only primary sources of Salmonella in laying hens but are also inhumane.

Sincerely,

Wendy Swann
Research Associate

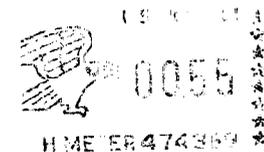
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