

GEORGIA POULTRY LABORATORY

MAIN LABORATORY
BOX 20 • OAKWOOD, GEORGIA 30566
PHONE: (770) 535-5996
Fax: (770) 535-1948



August 8, 2000

Dear Sir or Madam,

I would like the opportunity to comment on the "Current Thinking Papers on Egg Safety National Standards" (Docket No. 00N-0504). I had the opportunity to attend the meeting and I was disappointed by the shallowness of the outline basically that was presented to us. I am concerned about how the proposed rule will deal with such important issues as "biosecurity", "rodent control", and "cleaning and disinfection". It was not clear whether FDA is going to mandate a program or if each poultry company will be allowed to develop their own program. If they are allowed to draw up individual programs (which I believe is the proper way) how will FDA oversee each program to ensure that each program meets the necessary requirements? If the intent is to have a national program, FDA should be aware of the vast differences in housing and management within the commercial egg industry. It would be impossible to write a program that would "fit" each company or each housing type.

I am concerned how the requirement for Salmonella-negative feed will be enforced. Monitoring every ingredient and every lot of feed will require a tremendous amount of sampling and culture. Since poultry feed is transported to the farm the day it is made, by the time the culture result is known the chickens have eaten the feed. A more reasonable and practical approach would be for the rendering plant and feed mill to adopt sanitation procedures to reduce the level of Salmonella and prevent contamination of product.

Another concern is the requirement for refrigerating eggs (i.e. 45 F) if they are held for more than 36 hours after lay. When these eggs are processed the temperature differential between the egg and the wash water will result in a lot of cracking.

I would like to know how the timing of the environmental testing of the laying houses came about. What are these times based on? The Action Plan also had an environmental test in the pullet house. Has that been taken out? Who will collect these samples and where will they be tested?

I heard for the first time of the development of a microbial performance standard for liquid egg prior to pasteurization. I question the rationale for the standard to be on unpasteurized liquid egg that will be pasteurized. Why test a product that will pass through a kill step? A similar mistake exists in the "Mega Reg" where carcasses are cultured before the chill tank. Eggs intended for pasteurization may be of lesser quality than commercial whole eggs and may even contain SE (this plan will mandate that suspected SE infected flocks pasteurize their eggs). I do not understand how you can mandate sending eggs that may contain SE to the breakers and then punish them because



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they have SE in them. I would highly recommend that FDA rethink this performance standard.

Sincerely,

W. Douglas Waltman, II

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