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

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SUBJECT: Docket Numbers 98N-1230; 96P-0418; 97P-0197

Gentlemen and Ladies:

I find it astonishing - and I am shocked - that the Food and Drug Administration has left unchallenged the inhumane practice of forced molting of egg-laying hens! **FORCED MOLTING INVOLVES THE INTENTIONAL STARVATION OF HENS FOR PERIODS UP TO 14 DAYS!** This is so stressful that it severely cripples the hens' immune systems, rendering them highly susceptible to deadly bacteria. And- incredibly - approximately sixty (60) % of egg producers in the United States utilize forced molting - either by drastically reducing the hens' rations or totally withdrawing their food and water for up to two weeks!

Forced molting is done so that an "additional round" of egg laying is brought about more quickly than it would occur naturally (because the longer a bird goes without molting, the poorer quality of egg it produces). However - research reveals that, in flocks subjected to forced molting:

1. Eggs produced contain considerably higher levels of salmonella
2. (according to USDA research immunologist Peter Holt) ... the cellular immune response of the hens is depressed, and this compounds the severity of any existing infection because the hens are so severely weakened, they are easy targets for infectious bacteria).

In the words of the USDA Food Safety and Inspection Service (FSIS): "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of *Salmonella enteritidis* by laying hens subjected to these practices".

Humans who eat eggs tainted with salmonella develop flu-like symptoms of vomiting, nausea, diarrhea, and, often, dehydration, convulsions, and prostration. The Centers for Disease Control state that salmonella is one of the top ten most deadly infectious diseases; however, it was almost non-existent prior to 1980 (when many egg producers began the widescale practice of forced molting)!

Merely placing a warning label on egg cartons and regulating egg refrigeration temperatures is woefully inadequate agency practice; **because the FDA's mission is to safeguard public health, it is imperative that it take forthright action by immediately prohibiting the deplorable, inhumane practice of forced molting!**

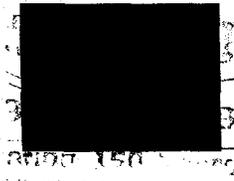
Sincerely,



Christine Burton

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96P-0418



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CROSS FILE SHEET

File Number:

98N-1230/ *C804*

See File Number:

97P-0197/ *C805*

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