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Division of Dockets Management
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

[Docket Nos. 2000N-0504 and RIN# 0910-AC14.

Gentlepersons:

I am pleased to again have the opportunity to comment on the Food and Drug Agencies efforts to prevent Se in shell eggs during production. As in my previous comments to this docket [December, 2004], these comments are offered by a complex manager with academic and scientific training as well as extensive experience in poultry. I am currently general manager of an egg producing/processing division in Rochester, Washington. To demonstrate the importance that our parent company Valley Fresh Foods Inc. places on the rearing of replacement, I directly supervise brooding and grow-out of our replacements..

During my career, I have held various positions as a poultry Veterinarian including Associate Professors at College of Vet. Medicine at Wash State University, represented an international chicken and turkey breeder and chief veterinarian for a major poultry meat producer.

As an egg producer, our growing practices and monitoring procedures are planned to control exposure of growing pullets to several classes of infectious agents. Pullets are vaccinated for the infectious agents known to be endemic in the lay houses. We choose to remain free of several other poultry pathogens [Mycoplasma, ect]. In addition, we work to keep flocks free of food associated human pathogens.

The proposed FDA rule focuses on the various details of preventing Salmonella Enteritidis in Eggs during the lay cycle by emphasizing some of the critical points in the husbandry of egg layers.. As with other "control" procedures, SE control has action, monitoring and correction components. We purchase replacement chicks from parent stock monitored to certify free of SE agents; chick box papers are cultured for any Salmonella spp. These chicks are brooded in houses cleaned completely between flocks including hot-water wash and fumigation. Buffer zones around houses are refreshed at that time including disinfectant and insecticide sprays as well as varmit feeding stations.

To continue this "free" status, our brood/grow-out facilities are geographically isolated from other poultry and are "operationally" isolated to increase biosecurity. Operational sites are isolated by fences or tree rows; debris and bush free zones surround the buildings; houses are locked to control entry, vehicles entering sites are washed before entry; in-house rodent and fly control programs are in place.

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In addition to isolation and biosecurity, SE vaccinations [competitive exclusion] are intended to prevent young pullets from responding to any SE contamination in the lay unit. Note that all flocks are monitored for SE prior to disposition and that in-line processing plant is cultured periodically for Salmonella.

To further monitor the infectious agent status of rearing flocks, whenever clinical signs are noted in any system [respiratory, enteric, etc.] a sample of birds is submitted to Veterinary Diagnostic Laboratory where indicated testing is performed.

As in my previous communication, I urge again that FDA consider the "success" of the Egg Quality Plans already in place on our brood/grow-out facilities. Most of the core elements put forth in the proposed regulations are addressed in these plans. Egg Quality plans are developed to utilize the specific facilities and resources available. .

Our egg industry needs regulations that are flexible, reasonably applied, and scientifically based if we are to survive as a business. I strongly urge you to consider the discussion offered above, so that further regulations can be workable for our industry.

Above my signature



Duane E. Olsen D.V.M. and General Manager

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