

Anita Sax

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November 17, 1999

FDA/Dockets Management Branch (HFA-305)
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Docket No. 97N-0074

I would like to submit my comments regarding docket #97N-0074. One way to reduce foodborne illness in the nation's food supply is to ban forced molting.

A natural molt frequently happens to hens at the onset of winter, when nature discourages the hatching of chicks. The hen stops laying eggs and concentrates her energies on staying warm and growing new feathers.

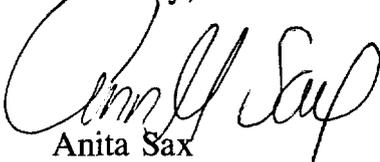
The egg industry artificially manipulates this natural process by forcing an entire flock to molt simultaneously, normally after 10 months of relentless egg production. It is used as an economic tool to renew shell quality in exhausted hens when it is deemed cheaper to "recycle" them rather than immediately slaughter them after 40 or so weeks of constant egg-laying on a calcium-deficient diet.

To force the hens to molt, their food is entirely removed or nutritionally reduced for an average of 10 days. Water removal, drugs and artificial dark-light manipulation may also be used. The hens abruptly shed their feathers and stop laying eggs for one or two months, instead of the normal three or four. The survivors may be force-molted two or three more times, based on economics.

In 1994, the College of Veterinary Medicine at the University of Florida, published a paper entitled, "Salmonella Control and Molting of Egg-Laying Flocks - Are They Compatible?" In part, the paper said that the standard molting procedure of starving birds for 10 to 14 days "unavoidably stresses the birds. Their immune system is therefore suppressed and the flock's susceptibility to salmonella infection is increased."

Forced molting in an unnatural practice and is tainting Americans' food supply.

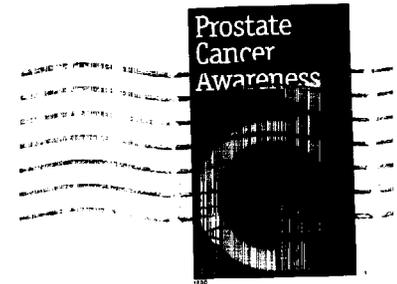
Sincerely,



Anita Sax

97N-0074

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