

Dockets Management Branch
Docket No. 98F-0165
HFA-305

2110 '00 AUG 15 19:42

Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Susan Prager
211 Orange Road
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August 9, 2000

Re: Irradiation in the Production, Processing and Handling of Eggs

I am writing to express my concern at the FDA's recent ruling to allow irradiating shell eggs. More and more frequently I find that the FDA acts in the interest of business, and expedience, rather than in the protection of the consumer as its mandate requires.

I ask that this latest regulation be delayed and that a public hearing be held to allow concerns to be expressed and evaluated.

The irradiation of shell eggs is an unacceptable response to the risk of salmonella, the occurrence of which is exacerbated by the exact issues the irradiation seeks to mask.

- hens' eggs have virtually full-proof many-layered barriers against pathogens given that, in nature, hens' eggs are intended to hatch healthy chicks (CDC, 1990; Davis, 1996);
- chronically stressed, immuno-compromised hens are laying contaminated eggs for human consumption in crowded, filthy buildings and are subjected to a variety of disease-inducing practices including stressful lighting programs and the intentional starvation of the hens known as forced molting. These practices impair hens' immune systems, predisposing them to Salmonella infection. Irradiation masks these primary causes of Salmonella enteritidis (SE) in eggs, and, we are assured, it won't even do that.

Both government and industry point out that irradiation of eggs cannot substitute for sanitation, or for recommended packaging, refrigeration, cooking, and serving of eggs. "Irradiation of fresh shell eggs at the doses requested in the petition will reduce, but not entirely eliminate, microorganisms in eggs," according to the Federal Register, July 21, 2000. Moreover, these microorganisms can grow back from a few to many despite radiation.

It appears that for the egg industry, an attractive feature of irradiation is its ability to extend the shelf life of eggs by reducing bacterial spoilage. I.e., old, irradiated, vitamin-depleted eggs can sit there a week or so longer with "fresh" stamped on the carton. Meanwhile, the most targeted pathogen, SE, has been shown to be the most irradiation-resistant type of Salmonella (Brown, 1994) following exposure to approved levels of radiation of meat and eggs up to 3.0 kiloGrays (kGy).

The filthy laying conditions and inhumane treatment of the hens by stressful lighting and forced molting (prolonged starvation) are reasons enough to require that the industry clean up its procedures. However, even disregarding the cruelty-to-animals perspective, a compelling reason to clean up the conditions is that there is epidemiological evidence that these awful conditions have been shown to actually increase the prevalence of SE-positive eggs.

Experimentally, Holt et al. (1996, 1995, 1994, 1993, 1992) have demonstrated that molting is associated with increased numbers of SE in hens' intestinal tracts, and higher rates of SE-positive eggs are produced

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following molt. Schlosser et al. (1995) demonstrated similar results in a field study during the Pennsylvania Pilot Project. In that study [which comprised 31 flocks from May 1, 1992 to May 1, 1994] molted flocks produced SE-positive eggs twice as frequently as non-molted flocks for a period up to 140 days following molt (Salmonella Enteritidis Risk Assessment-Shell Eggs and Egg Products, June 12, 1998; Aug. 10, 1998, p. 40).

Even the USDA's own USDA Farm Animal Well-Being Task Group Meeting documents of July 21, 1998 show this link.

According to a News Release published by the health research group Public Citizen, on July 24, 2000, radiation "treatment" of eggs will deplete vitamins, disrupt proteins, and mask factory farm filth. Public Citizen says in its News Release that "The request to irradiate eggs was made by Edward Josephson, who during the 1960s and 1970s oversaw the U.S. Army's food irradiation headquarters in Massachusetts, where dozens of studies revealed serious health problems in lab animals that ate irradiated food, including premature death and cancer."

To approve the irradiation of eggs is not only aiding and abetting cruelty to animals but displaying a total lack of regard for the safety of the population. If irradiating eggs will kill the targeted microorganisms, as you believe, what will it do to us? No rational person would believe for one moment that consuming irradiated food is harmless.

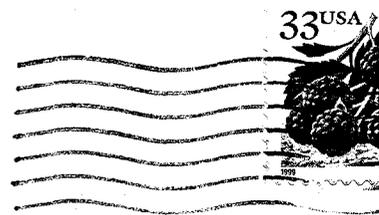
I urge you to delay this terrible regulation and request public hearings.

Respectfully,

A handwritten signature in black ink, appearing to read "Susan Prager", with a long horizontal flourish extending to the right.

Susan Prager

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