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August 1, 2000

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

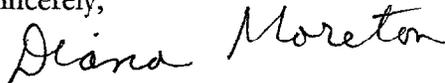
Re:Docket No. 98F-0165

Dear Dockets Management Branch:

I oppose the irradiation of eggs. I request that the implementation of the new egg irradiation regulation be delayed and that a public hearing be held.

My objection focuses on the fact that the irradiation of eggs is an intervention strategy which fails to address primary causes of Salmonella enteritidis- contaminated eggs. Irradiation falsely implies that eggs are inherently unwholesome products that can only be made "clean" and "safe" by complicated nutrient depleting technologies like irradiation. In reality, (a) 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); and (b) chronically stressed, immunocompromised 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, I am assured, it won't even do that.

Sincerely,



Diana Morton
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98F-0165

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