

August 11, 2000

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

Docket No. 98F-0165

Dear FDA:

This letter is in connection with the proposed irradiation of eggs. The proposal is a foolhardy one for the following reasons:

- It does not take into consideration the *reason* for the contamination. It merely tries to provide a quick fix. Without addressing the *cause* of the impurity you are willingly allowing it to continue and fester.
- Because it does not look deeper than the symptomatology, it completely ignores the plight of the animals involved in the process. It treats the hens as mere machines to be manipulated and abused until no longer viable.
- It assumes that treated eggs are returned to their natural state, when there is no foundation for such an assumption. Radiation is not a cure-all for pollution, and while it may eliminate some contamination, it cannot obliterate it all. And, in the process it kills the good with the bad.
- It assumes that the treatment itself is safe, something which has in no way been proven. Even the "experts" do not *know* that irradiated food has no long-term ill effects.

I think you are desperately searching for a way to avoid addressing the root problem, namely, the horrendous living conditions in which laying hens are forced to exist. Even a cursory examination reveals a score of intolerable circumstances. These exploited animals are kept in filthy and overcrowded factory surroundings; their normal laying cycles are controlled and altered by means of mental and physical stress; and they are manhandled by careless and inept workers.

The conditions to which these sentient creatures are subjected lays a perfect groundwork for disease and contamination. Only the blind or intentionally ignorant could miss this vital point. Irradiation is a band-aid on a gaping wound. Please do not fall for this quick fix.

Sincerely,



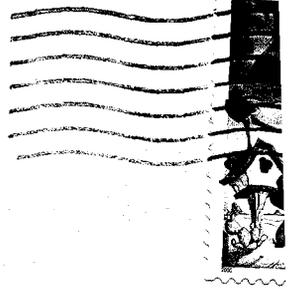
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