



## OHIO POULTRY ASSOCIATION

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August 11, 2000

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Cotton Annex, Room 102  
Washington, DC 20250-3700

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

1991 10 AUG 14 10:21

**REFERENCE: FDA DOCKET NUMBER 00N-0504, FSIS DOCKET NUMBER 98-045N4**

**“Egg Safety: Current Thinking. Papers on Egg Safety National Standards.”**

The Ohio Poultry Association represents 100% of Ohio's egg production, which is 9% of the nation's total egg production placing the state number one in total egg production. Our association's representation includes 300 small contract and independent egg producers as well as four small egg processors, 14 medium egg producers and processors and two large egg farm/processors. Included in this representation are two farmer-owned cooperatives.

### **BACKGROUND**

Since 1996, Ohio has had an Egg Quality Assurance Program (Salmonella Enteritidis shell egg reduction program) in place and active- involving over 98% of the egg production (Appendix A). Each year since 1996, the incidence of Salmonellosis as reported by the Ohio Department of Health has decreased (Appendix B).

The number of SE positive houses in Ohio has consistently decreased from 1997 (with 20% positive) through 1999 (9.4% positive). Therefore, the statistics show that our program is working and working quite well. However, it has taken a combination of effective training, biosecurity, testing, and auditing to achieve the goal of providing egg safety to the consumer. The Ohio program was developed and implemented in conjunction with the Ohio Department of Agriculture, Ohio Department of Health, regional FDA office, USDA/APHIS Vet Services, and the Ohio Poultry Association (Appendix C).

Egg producers are provided with test kits and conduct two manure tests for SE (before the pullets are moved into the laying house and again before they leave the layer house). Annual audits of the layer houses are conducted by the Ohio Department of Agriculture on a variety of areas (Appendix D). An AAFLD accredited lab at the Ohio Department of Agriculture conducts the SE manure monitoring tests and egg tests with further serotype confirmation and phage typing provided by

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*Serving Ohio's Egg, Turkey and Chicken Industry*

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National Veterinary Services Laboratories in Ames, Iowa. We identify all salmonellae and provide this information to the producer so they can make accurate management decisions. This protocol is in place because there is a slight chance that a Salmonella O antisera Group D factor 9 positive test which includes the serotype enteritidis may not be SE. Therefore, it is sent for confirmation to Ames, Iowa. There is a great deal more in our program which has been attached for reference.

Dr. David Glauer, State Veterinarian and Chief of the Ohio Department of Agriculture's Diagnostic Laboratory (an accredited lab) is a member of the President's Council on Food Safety - Egg Safety Working Group. On March 30, April 6, and July 31, 2000, the Ohio Poultry Association attended the public meetings held by the FDA and FSIS and offered comments at the meeting in Columbus, Ohio and Washington D.C.

Ohio has a working program that to date exceeds other programs in the nation in ensuring consumer food safety and is noted for having the greatest number (98%) of shell egg producers participating. The following comments should provide you with sound scientific data and sound experience. *In beginning an effective shell egg safety program there is no substitute for practical experience.* Remember a program that works in theory may not necessarily work in practice. We have changed the Ohio program many times because some theories just did not work. We are offering you this experience because the knowledge base we have accumulated comes from sound scientific data derived from practical situations.

### Comments Regarding On-Farm Standards

As you are aware from our comments at the Public Meeting on the "Current Thinking Papers on National Standards for Egg Safety" in Washington, DC, Ohio has some concerns and comments on the current thinking document.

### Ohio Is Not in Agreement with a 45-Week Test

As previously noted the Ohio program has two tests to give an accurate history of SE for each layer house. This further ensures consumer food safety because it gives an accurate picture of the layer house and its SE status first before moving young layers into the house and then towards the end of lay. This gives the producer a chance to plan for a total wet clean and disinfection of a positive layer house.

If the 45 week test is used, the SE status of the house is not known prior to moving new birds into the house and old birds out of the house. So the 45-week proposal is requiring that young birds are being moved into a house at the beginning of lay without the SE status of the house being known until the next 45 week test. If the 45-week environmental test is being conducted in mid-lay cycle, then the house (regardless of the egg test) will still be SE-positive if the 45-week manure test is SE-positive. Does the proposed federal program presume that if a house tests environmentally positive at 45 weeks for SE, it is once again at negative status after four negative egg tests? In the Ohio Program, this is not the case in a positive environmental laying house. The house must be totally wet cleaned and disinfected.

Manure removal, wet clean and disinfection is a considerable cost to the producer, but it maintains egg safety for the consumer. Stringent biosecurity with a emphasis on rodent and fly control is also necessary to maintain SE negative status. The Ohio Program also requires at least down-time and a blow-down between flocks for a negative environmental house.

A 45-week test just does not allow a producer to determine how effective their biosecurity is because all factors must work together. **(In our program each row in the house is tested -What is tested in your program?)** If you still have hens laying eggs in an SE environmentally positive house with negative egg tests, there is no other monitoring in the program. Therefore, the Ohio program works better at maintaining consumer shell egg safety because of our monitoring protocols for birds remaining at lay.

### No Scientific Basis for 45 Week Test

*We are requesting a copy of the scientific data that was used to determine that the best test is the 45 week test.* The fact that a test may take place when it is believed the most stress in hens occurs, does not mean that the hen will be shedding SE at this point of lay. Dr. Beverly Byrum, DVM, PhD, Veterinary Preventative Medicine and Laboratory Director at the Ohio Animal Disease Diagnostic Laboratory states, "It is generally believed that there is an increased frequency of salmonella shedding as hens increase in age." In fact, Dr. Byrum notes that data from the Salmonella Enteritidis Pilot Project, conducted in Pennsylvania, shows that flocks over 72 weeks old had a higher egg contamination frequency than flocks under 72 weeks old. Therefore, the Ohio program has a more preventive orientation, which is lost with the 45-week-of-age test.

### Audits Conducted

The Ohio program also has an annual audit conducted by the Ohio Department of Agriculture of each participant to ensure that they are following biosecurity, stringent rodent and pest control, manure management and record keeping protocols. This is an important part of ensuring food safety. If a layer house is SE positive the Ohio Department of Agriculture also conducts a reinspection (Appendix E) after a total manure clean-out, wet clean and disinfection to give a negative status to that laying house. This ensures that the new laying hens (after a negative SE test) are being moved into an SE negative laying house. This markedly decreases the risk for SE in shell eggs. What will the Federal audit and reinspection procedures be for laying houses?

### Affect on Small Shell-Egg Producers

There are a large number of small contract and independent shell egg producers in the state of Ohio, who are all on the Ohio Program. The concern (as reiterated in Washington) is that a 40-to-45-week-of-age test will not show a history of the house. It has been important for food safety as well as for the biosecurity measures in each individual poultry house to show how that house is doing before it is repopulated with birds. Therefore, we conduct two tests.

Our program, as well as various other programs throughout the nation (e.g. California's and Pennsylvania's) has relied on stringent biosecurity measure to also ensure food safety because flies and rodents are likely sources of SE and can infect the birds. We are not trying to compromise food safety in our eggs. What we are trying to do is provide a workable program that ensures food safety, especially for smaller producers.

Secondly, our state department of agriculture's AAVLD-accredited diagnostic laboratory conducts our tests on both environmental samples and egg samples. Ohio has a state line-item in the budget that covers this program by paying for test kits and partially subsidizing the testing so that the producer pays \$7.00 for each row being tested in their layer house.

If numerous eggs are tested (as will happen at the beginning of a program) in other states, the laboratories will be inundated with egg samples at 1,000 eggs every two weeks. Also, smaller egg producers who are independent or on certain contracts will face having to take a substantial decrease in the price of eggs that are diverted. This will negatively affect the small family farmer and must be measured through an economic impact analysis before putting such a program in place.

This is a large number of eggs for labs to handle. Advocates of this 45-week test have stated that other labs could be certified. However, we want to ensure diagnostic confidence in the ability of those laboratories to provide adequate diagnostic tests without a great deal of expense to the producer, because the producer could bear the costs of this test (which is not covered under a state line-item in other states). *Also, who will do the final verification test for Group D factor 9 positive tests? There is an additional verification test necessary which is lacking in the federal program.*

Therefore, it is important that all factors be considered. We have proven in Ohio (and we would be willing to share the data with you) that our SE risk reduction program does work. We have seen a marked decrease in SE positives in layer houses. Our producers have increased the biosecurity and Best Management Practices in their houses and documented those security measures. It is very important that our concerns are noted as legitimate and our experiences are given the utmost consideration. What we are trying to do is make this program workable on a federal level.

*We would strongly suggest that those states with workable programs meet with FDA to discuss the rule before it is published.*

### Clarifying Language for Salmonella Negative Feed

Clarifying language should be written that indicates a letter of guarantee from the feed producer certifying American Feed Industry Standards for salmonella-negative feed is all that is necessary in the producer's file. That is what is required in the Ohio program.

### Vaccine Program as BMP Step

Vaccine programs such as Bio-immune and the Megan vaccine need to be addressed in the federal program and how they would fit into the Best Management Practices of the egg producer. Once

again, our state only allowed vaccine programs to be included in BMPs (beginning this year) as another management tool to fit into an effective program, because vaccines are not effective after a certain point, but they are very effective in a continuous biosecurity program.

### Seminar and Certification of Producers

The seminar and certification step is important. Currently, the Ohio Poultry Association, along with the Ohio Department of Agriculture and the Ohio Department of Health have state certification programs in place, where we train producers on our egg quality assurance program and the variety of steps necessary to comply with this program. Also, as changes are made to the program, seminars are used to update producers on those changes. So it is important that we keep all of the state associations and other state partners involved, because we do have a history of being able to reach a great number of producers with these seminars for certification.

### Refrigeration Should Be Required for All

Ohio state law requires that all eggs be refrigerated at 45 degree ambient temperature for all sizes of flocks, including farmers' markets, from farm to table. ***There should be no flock size exemption or this will jeopardize food safety.*** Clarifying language that existing state laws are not preempted should be included in any type of rule that may be published.

### Retail Refrigeration Required

Retail and wholesale refrigeration should be required. Many times retail groceries and wholesalers do not refrigerate eggs, and if a consumer food safety program is to work, this must be required.

### Retail Repackaging of Eggs

Retail grocery stores must also stop repackaging of eggs. Ohio's Division of Food Safety has issued a notice to food retailers to stop repackaging of eggs because it jeopardizes consumer food safety and mixes eggs from a variety of sources and grades (Appendix F).

### In-Plant Processing HACCP Plans

As far as in-plant processing is concerned, how will FSIS verify the variety of steps in egg processing? If continuous inspection will be involved, how specifically are we going to take HACCP plans for meat plants and apply them to egg-processing plants when they are two separate and different types of processing entities and units? Since many of our processing plants are in-line and belong to farms, they are handled differently from meat plants. In our audit procedures within the state and in our state laws, we do have a HACCP-type egg-processing program, which is inspected on a quarterly basis by the Food Safety Division at the Ohio Department of Agriculture, and we emphasize HACCP control programs for our audits in egg-processing plants (Appendix G).

## **Pasteurized Egg Producers Need Biosecurity Too!**

Even though an egg is being subjected to a kill step (pasteurization), that egg producer should be subject to biosecurity and Best Management Practices. Any food production site should be following Best Management Practices, because it results in a general reduction of disease.

## **Shell Egg Prices**

Consideration should be given to establishing a base price of eggs on this program, to ensure that the extra efforts that are being put into this program also will pay off for the producer, who is trying to ensure food safety and going to extraordinary lengths to initiate biosecurity programs to ensure consumer confidence in the food products. It is very disheartening when farmers continue to be price-takers. Eggs have been the same price for the last 20 years, but producers are subject to increased costs. Therefore, if we could set a base price on eggs, it would not come out of FDA's budget. However, we would ensure that the producer is also receiving a fair price for the product.

## **Federal Program Changes**

As technologies are adopted and modified, FDA and FSIS must ensure that the program being adopted can also be changed and modified. One of the successes of the Ohio Program is that the program has been able to be modified in light of new technologies or new scientific data. Therefore, it is important to have flexibility in the program and to have future retraining of producers to inform producers and to keep them up to date on food safety.

Thank you for allowing comments on the current thinking for the egg safety standards. We look forward to working with you on a national program.

Sincerely,

Alice Walters  
Executive Director

cc: Dr. David Glauer  
Lou Carson, FDA  
Judy Riggins, FSIS

## Appendix A

# OHIO EGG QUALITY ASSURANCE PROGRAM

## INTRODUCTION

For the purpose of enhancing food safety, reducing risk to public health and maintaining consumer confidence in Ohio produced eggs, the Ohio Poultry Association (OPA), in cooperation with the Ohio Department of Agriculture (ODA) and the Ohio Department of Health (ODH), has developed the following Ohio Egg Quality Assurance Program (OEQAP). Voluntary participation by the industry is a commitment to minimize the risk of *Salmonella enteritidis* (SE) in shell eggs. The program does not guarantee the eggs to be free of SE. Participants in the plan must implement and document the placement of SE monitored chicks; cleaning and disinfection procedures; rodent, fly and pest control programs; biosecurity measures; feed sourcing under a SE reduction plan; flock health monitoring program; and SE environmental and egg testing. The publication "A Health Manual for Ohio Poultry Producers", produced by the Ohio State University Extension (OSUE), may be used as a template for developing written Best Management Practices (BMP's).

OEQAP participants agree to develop and implement a program for their facility that includes the standards identified in the OEQAP. Review of participant plans will be made by the Ohio Department of Agriculture, as a third party verification of the plan.

At a minimum, participants of the OEQAP agree to:

## PRODUCTION

1. Designate an individual(s) to be responsible for coordination of the the quality assurance program and on-site training for the OEQAP;
2. Commercial layers must come from a National Poultry Improvement Program (NPIP) "U.S. *Salmonella Enteritidis* Monitored" facility;
3. Chicks and pullets must be transported in cages and trucks that are cleaned and disinfected;

4. The pullet grow out facility shall have a documented BMP program which includes wet cleaning and disinfection prior to repopulation and collection of environmental samples at 8-12 weeks of age, prior to placement in a layer house;
5. SE vaccine may be used as a part of a SE control program. Vaccine use must be documented;
6. Develop, implement and document a cleaning and disinfection program, that includes dry and wet cleaning activities, in brooder/grower flocks and/or mature production house flocks utilizing current BMP's. Environmentally positive layer houses will be wet cleaned and disinfected and then inspected by ODA prior to population of the house;
7. Develop, implement and document rodent, fly and pest control programs, that includes routine monitoring, utilizing current BMP's;
8. Develop, implement and document a biosecurity program that reduces risk of contamination of the grower, layer and processing areas, utilizing current BMP's;
9. Develop, implement and document a feed sourcing program that incorporates good manufacturing practices established by the American Feed Industry Association (AFIA) in the "Recommended Salmonella Control for Processors of Livestock and Poultry Feeds" and protein ingredients from plants participating in the "Animal Protein Producers Industry (APPI) Salmonella Reduction Education Program", or equivalent programs. Documentation may be a letter of guarantee from a feed supplier;
10. Develop, implement and document a flock health monitoring program, utilizing current BMP's that includes, but are not limited to, professional evaluation of mortality, treatment and vaccination records;
11. Follow environmental and egg sampling protocols:
  - A. If the pullet environmental sample is positive:
    1. at 29-31 and 44-46 weeks of age, collect environmental samples from manure pits of the layer facility, regardless of SE vaccination.

2. If layer facility environmental samples are positive, sample 480 eggs no later than two weeks for the initial sample, then in intervals of every two weeks for a total of four samples. If egg testing results are positive for SE, eggs from that house will be immediately diverted to a breaker; and
  3. Submit four 1000 egg samples, collected at two week intervals. If the four samples are negative the production following the last negative test may enter whole shell egg market.
- B. At 2-10 weeks prior to moving spent fowl, take environmental samples of manure pits. If the environmental sample is found to be positive, the producer may choose one of the following options:
1. Sample 480 eggs from the environmentally positive layer house no later than two weeks from the initial sample, then in intervals of two weeks for a total of four samples. If egg testing results are positive for SE, eggs from that house will be immediately diverted to a breaker; or
  2. Depopulate the positive layer house and clean and disinfect according to documented protocol.
12. Following the first occurrence of a positive environmental test sample, the producer must internally review their program, including cleaning and disinfection procedures; rodent, fly and pest control programs; biosecurity; feed sourcing and flock health monitoring. Following a second occurrence of a positive environmental test sample, at the same house, the producer must utilize professional consultation and review their program including cleaning and disinfection procedures; rodent, fly and pest control programs; biosecurity; feed sourcing, and flock health monitoring.
  13. Producers are required to maintain written and dated records verifying that all protocols have been followed.

## PROCESSING

1. Develop, implement and document BMP's and Hazard Analysis Critical Control Points (HACCP) programs for all production facilities;
2. Clean and sanitize all eggs intended for table egg distribution using BMP's HACCP programs as recommended by the USDA Food Safety Inspection Service (FSIS) or ODA. BMP's shall include, but not be limited to the following:
  - A. Equipment must be thoroughly cleaned and in good repair at the end of each days operation;
  - B. Utilize potable water with less than 2ppm of iron;
  - C. Maintain wash water at 90 degrees Fahrenheit or higher and at least 20 degrees Fahrenheit higher than the temperature of the eggs to be washed;
  - D. Cleaning compounds used in wash water shall comply with Federal and State Food Laws and Regulations and used for the purposes intended;
  - E. Wash water, derived from a potable source, shall be added continuously and replaced approximately every four hours and more often if needed;
  - F. Washed eggs shall be spray rinsed with warm water that is equal to or warmer in temperature than the washed eggs. An approved sanitizer that complies with Federal and State Food Laws and Regulations shall be used in the rinse water. If chlorine is used, levels shall be maintained between 50 to 200 ppm;
  - G. Follow USDA guidelines if eggs are oiled.
3. Refrigerate all shell eggs at 45 degree Fahrenheit ambient temperature or lower after processing.
4. Label all egg packaging in such a manner that the production unit of the eggs can be determined retrospectively. This does not preclude the industry from providing an open sell by date. Every processing plant shall keep records necessary to adequately identify the source of each day's packaging as finitely as possible. Label and packaging BMP's should include, but not be limited to the following:
  - A. Label egg cartons and cases with "Keep Refrigerated";

- B. Label cartons and loose pack eggs with a Julian pack date; Qualifying prefixes such as "Use before", "Use by", "Best before", "Best if used by", or similar language generally indicates the maximum time frame for expected quality. The dates associated with these prefixes are to be calculated from the date the eggs are packed into the container and may not exceed 45 days including the day of pack. Qualifying prefixes such as "EXP", "Expiration date", "Sell by", "Not to be sold after date on end of carton", "Purchase by", "Last sale date on end of carton", or similar language denotes stock rotation. The dates associated with these prefixes are to be calculated from the date the eggs are originally packed into containers and may not exceed 30 days including the date of pack. For eggs sold under government contract, cases will be labeled in accordance with contract requirements;
- C. Label cartons and cases with plant of origin number, and if possible, flock number;

## **DISTRIBUTION**

1. Develop and implement written BMP's and/or HACCP program for all distribution activities, including transportation. Distribution BMP's should include, but not be limited to the following:
  - A. Documented cleaning and disinfection of all transportation equipment;
  - B. Wash and sanitize plastic egg flats after each use, or return to farm of origin to avoid cross contamination. Non-soiled fiber need to be returned to farm of origin;
  - C. Retail returns can not be reprocessed for retail shell egg sale;
  - D. Maintain 45 degree Fahrenheit ambient temperature in all transportation vehicles during egg transport;
  - E. Inspect and clean on a regular basis, all refrigerated transportation vehicles, or more often in case of spill or breakage;
  - F. Assure that all eggs held in warehouses, distribution areas, or other storage will be held at a 45 degree Fahrenheit ambient temperature.

## **FOOD SAFETY**

Participants in the OEQAP agree to promote good food handling and preparation techniques, in cooperation with the OPA, ODA, ODH. Participants also agree to inform customers of the BMP's and biosecurity measures being utilized at production facilities.

**The undersigned hereby agrees to voluntarily participate in the Ohio Egg Quality Assurance Program. Failure to follow the OEQAP and/or correct deficiencies identified in audits, may give cause for revocation of certification by OPA. Participants acknowledge that sample results and audit findings will be shared with OPA.**

By: \_\_\_\_\_ Title: \_\_\_\_\_  
Company: \_\_\_\_\_ Date: \_\_\_\_\_

BY: \_\_\_\_\_ Title: \_\_\_\_\_  
Ohio Poultry Association Date: \_\_\_\_\_

(Signed originals should be maintained by Participants and OPA)

2/8/2000

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REPORTED CASES OF NOTIFIABLE DISEASES  
BY YEAR OF REPORT, EXCEPT AS NOTED,  
OHIO, 1995 - 1999

	1999	1998	1997	1996	1995	MEDIAN	MEAN
AIDS (ACQUIRED IMMUNODEFICIENCY SYNDROME)*	435	543	633	868	989	633	694
AMEBIASIS	6	8	20	21	13	13	14
BOTULISM*	1	4	3	1	2	2	2
BRUCELLOSIS	0	1	2	2	0	1	1
CAMPYLOBACTERIOSIS	1021	1062	1102	1332	1363	1102	1176
CHICKENPOX*	1306	1829	3322	2474	6242	2474	3035
CHLAMYDIA, TOTAL	29629	27078	23269	20651	29124	27078	25950
CHOLERA	0	0	0	0	0	0	0
CRYPTOSPORIDIOSIS*	67	75	38	45	116	67	68
CYTOMEGALOVIRUS (CMV), CONGENITAL	7	9	7	7	7	7	7
DENGUE	0	5	4	0	4	4	3
E COLI O157:H7*	262	128	108	155	107	128	152
ENCEPHALITIS, LACROSSE*	16	23	24	26	7	23	19
ENCEPHALITIS, OTHER VIRAL*	28	44	61	43	50	44	45
ENCEPHALITIS, POST INFECTION*	6	1	4	0	8	4	4
GIARDIASIS	1110	1093	1247	1333	1292	1247	1215
GONORRHEA, TOTAL	18138	17992	14993	14946	23178	17992	17849
H. INFLUENZAE INVASIVE DISEASE	63	48	85	95	99	85	78
HEPATITIS A	655	398	332	795	1760	655	786
HEPATITIS B	95	77	94	120	116	95	100
HEPATITIS, NON A - NON B (INCLUDES HEPATITIS C)	4	8	20	35	15	15	16
HERPES, CONGENITAL	4	2	9	8	5	5	6
HUS (HEMOLYTIC UREMIC SYNDROME)*	12	9	7	19	14	12	12
KAWASAKI DISEASE*	33	28	36	37	27	33	32
LEGIONNAIRES' DISEASE	85	133	120	116	151	120	121
LEPROSY (HANSEN'S DISEASE)	2	0	0	0	0	0	0
LEPTOSPIROSIS	0	1	0	2	2	1	1
LISTERIOSIS	55	56	21	35	27	35	39
LYME DISEASE	47	47	40	32	30	40	39
MALARIA	18	15	19	15	13	15	16
MEASLES, IMPORTED	0	1	0	4	1	1	1
MEASLES, INDIGENOUS	0	0	0	2	1	0	1
MENINGITIS, ASEPTIC	508	853	829	462	900	829	710
MENINGITIS, BACTERIAL, UNSPECIFIED*	47	69	67	106	119	69	82
MENINGITIS, OTHER BACTERIAL*	11	12	11	138	134	12	61
MENINGOCOCCAL DISEASE	134	143	164	159	115	143	143
MUMPS	21	29	35	52	54	35	38
OUTBREAKS, FOODBORNE	159	109	100	108	112	109	118
OUTBREAKS, WATERBORNE	0	2	0	1	1	1	1
PERTUSSIS	322	299	165	289	175	289	250
PSITTACOSIS	1	0	0	5	1	1	1
RABIES, ANIMAL*	36	59	116	13	12	36	47
REYE SYNDROME	0	0	0	1	0	0	0
RHEUMATIC FEVER	4	3	6	2	8	4	5
ROCKY MOUNTAIN SPOTTED FEVER (RMSF)	8	12	12	17	17	12	13
RUBELLA	0	0	0	0	0	0	0
SALMONELLOSIS	1313	1491	1545	1632	1545	1545	1505
SHIGELLOSIS	422	566	835	559	598	566	596
STREPTOCOCCAL DISEASE IN NEWBORN, GROUP B	70	54	79	99	171	79	95
STREPTOCOCCAL DISEASE, INVASIVE, GROUP A*	149	150	129	33	n/a	129	115
STREPTOCOCCAL TOXIC SHOCK SYNDROME (STSS)*	14	25	22	5	n/a	14	17
SYPHILIS, PRIMARY AND SECONDARY	86	130	223	584	898	223	384
TETANUS	2	3	0	0	2	2	1
TOXIC SHOCK SYNDROME (TSS), STAPHYLOCOCCAL	4	1	2	4	8	4	4
TOXOPLASMOSSIS, CONGENITAL	0	1	1	0	0	0	0
TRICHINOSIS	0	7	1	0	0	0	2
TUBERCULOSIS	317	230	286	301	280	286	283
TULAREMIA	0	0	1	0	1	0	0
TYPHOID FEVER	4	9	5	4	5	5	5
TYPHUS, MURINE*	0	0	0	1	0	0	0
VIBRIOSIS	1	2	2	2	2	2	2
YERSINIOSIS	53	61	48	54	72	54	58
<b>SUB-TOTAL</b>	<b>56791</b>	<b>55038</b>	<b>50304</b>	<b>47840</b>	<b>69991</b>	<b>55038</b>	<b>55993</b>
<b>Laboratory-Based Surveillance</b>							
STREPTOCOCCAL PNEUMONIAE, INVASIVE DISEASE (ISP)*	1664	1504	1384	326	n/a	1384	1220
VANCOMYCIN-RESISTANT ENTEROCOCCAL DISEASE (VRE)*	2302	2294	1612	252	n/a	1612	1615
<b>TOTAL</b>	<b>60757</b>	<b>58836</b>	<b>53300</b>	<b>48418</b>	<b>70024</b>	<b>58836</b>	<b>58267</b>

## SALMONELLA SEROTYPES: 1999 OHIO CASES

SEROTYPE	Freq	Percent	Cum.
ABAETETUBA	1	0.1%	0.1%
ADELAIDE	17	1.6%	1.7%
AGONA	9	0.8%	2.5%
ALBANY	1	0.1%	2.6%
ANATUM	6	0.6%	3.2%
ARIZONA	2	0.2%	3.3%
BAREILLY	1	0.1%	3.4%
BERTA	2	0.2%	3.6%
BLOCKLEY	1	0.1%	3.7%
BOVIS-MORBIFICAN	1	0.1%	3.8%
BRAENDERUP	14	1.3%	5.1%
BRANDENBURG	2	0.2%	5.3%
CARRAU	1	0.1%	5.4%
CERRO	2	0.2%	5.6%
CHESTER	1	0.1%	5.7%
CUBANA	1	0.1%	5.8%
DERBY	5	0.5%	6.2%
DUBLIN	2	0.2%	6.4%
ELOMRANE	1	0.1%	6.5%
ENTERIDITIS	175	16.3%	22.8%
FLINT	1	0.1%	22.9%
GIVE	1	0.1%	23.0%
GLOSTRUP	1	0.1%	23.1%
GROUP B	79	7.3%	30.4%
GROUP C	25	2.3%	32.7%
GROUP D	33	3.1%	35.8%
GROUP E	2	0.2%	36.0%
HADAR	12	1.1%	37.1%
HAGENBECK	1	0.1%	37.2%
HARTFORD	10	0.9%	38.1%
HEIDELBERG	59	5.5%	43.6%
HEILBRON	1	0.1%	43.7%
HVITTINGFOSS	4	0.4%	44.1%
INFANTIS	20	1.9%	46.0%
JANWANI	1	0.1%	46.0%
JAVIANA	12	1.1%	47.2%
JOHANNESBURG	2	0.2%	47.3%
KENTUCKY	4	0.4%	47.7%
KOTTBUS	1	0.1%	47.8%
LITCHFIELD	4	0.4%	48.2%
LONDON	1	0.1%	48.3%
MANHATTAN	2	0.2%	48.5%
MARINA	3	0.3%	48.7%
MBANDAKA	4	0.4%	49.1%
MISSISSIPPI	1	0.1%	49.2%
MONSCHAUI	1	0.1%	49.3%
MONTEVIDEO	22	2.0%	51.3%
MUENCHEN	13	1.2%	52.6%
MUENSTER	1	0.1%	52.7%
NEWPORT	60	5.6%	58.2%
OHIO	3	0.3%	58.5%
ORANIENBURG	19	1.8%	60.3%
PANAMA	3	0.3%	60.6%
PARA B-VAR JAVA	22	2.0%	62.6%
PARATYPHI B	22	2.0%	64.7%
POONA	2	0.2%	64.8%
READING	2	0.2%	65.0%
RUBISLAW	2	0.2%	65.2%
SAINT PAUL	14	1.3%	66.5%
SALMONELLA	1	0.1%	66.6%
SAN DIEGO	1	0.1%	66.7%
SAN-JUAN	1	0.1%	66.8%
SCHWARTZENGRUND	4	0.4%	67.2%
SENFENBERG	1	0.1%	67.3%
SHUBRA	1	0.1%	67.3%
STANLEY	11	1.0%	68.4%
TENNESSEE	1	0.1%	68.5%
THOMPSON	11	1.0%	69.5%
TYPE B	2	0.2%	69.7%
TYPHIMURIUM	311	28.9%	98.6%
UNKNOWN	11	1.0%	99.6%
WANDSWORTH	1	0.1%	99.7%
WASSENAAR	1	0.1%	99.8%
WELTEVRENDEN	1	0.1%	99.9%
WORTHINGTON	1	0.1%	100.0%

Total | 1075 100.0%

Untyped 238

TOTAL SALMONELLA 1313



**MEMORANDUM OF UNDERSTANDING**  
**OHIO EGG QUALITY ASSURANCE PROGRAM**

**Ohio Department of Agriculture**  
**Ohio Department of Health**  
**Ohio Poultry Association**  
**United States Department of Agriculture APHIS/VS**  
**United States Department of Health and Human Services, FDA**

The Ohio Department of Agriculture (ODA), the Ohio Department of Health (ODH), the United States Department of Agriculture Animal, Plant Health Inspection Service, Veterinary Services (USDA APHIS/VS), the United States Department of Health and Human Services, Food and Drug Administration Cincinnati District Office (USFDA), and the Ohio Poultry Association (OPA), agree to work in cooperation to reduce the possibility of outbreaks of egg-associated *Salmonella enteritidis* (SE) to assure food safety and protect the public from food borne illness. All parties support the implementation of the Ohio Egg Quality Assurance Program (OEQAP) (see Appendix A) as a voluntary industry program utilizing best management practices (BMP's) at the production, processing and distribution levels. The goal of the OEQAP is to reduce the risk of SE in shell eggs and increase consumer confidence in Ohio produced eggs. The ODA, ODH, OPA, USDA APHIS VS, and USFDA enter into this Memorandum of Understanding in order to highlight and delineate the separate and unique roles of these respective organizations in the development, implementation and maintenance of a program designed to reduce the risk of human cases and outbreaks of egg associated SE.

**The mission of the ODA:** is to provide regulatory oversight essential to maintaining consumer confidence in a safe food supply from farm to table. Through this MOU ODA will provide flock surveillance and inspection of Ohio egg producers and processors in support of reducing SE and assist in food borne outbreak trace backs to Ohio layer flocks. In order to fulfill this MOU, ODA will:

1. through the Division of Animal Industry, consult with the Ohio State University Extension, and cooperate with the other parties to this MOU in developing and conducting training and review of practices for participants in the OEQAP;
2. through the Division of Animal Industry, provide trained field personnel to conduct post cleaning and disinfection inspection of poultry facilities, food borne outbreak trace backs, OEQAP sample collection, and audit procedures;

3. through the Divisions of Animal Industry and Food Safety, be responsible for performing annual third party verification audits on participants in the OEQAP and provide audit reports to the producer and to OPA;
4. through the Division of Animal Industry, Animal Disease Diagnostic Laboratory (ADDL) provide laboratory analysis of environmental and egg samples for participants in the OEQAP;
5. through the Divisions of Animal Industry and Food Safety, perform trace backs to farm of origin;
6. through the Division of Animal Industry, be responsible for collection of SE trace back official test samples;
7. through the Division of Animal Industry, ADDL, provide environmental sampling test kits to OPA;
8. through the Division of Animal Industry ADDL, provide confirmation of serological testing of eggs following a trace back to an Ohio layer flock;
9. through the Division of Animal Industry, provide required post cleaning and disinfection inspection on environmental and egg positive houses; negative houses may be inspected as requested by the processor;
10. through the Division of Food Safety, be responsible for the enforcement of regulatory issues pertaining to the adulteration and misbranding of food established in Chapters 925 and 3715 of the Ohio Revised Code;
11. through the Division of Food Safety, provide consultation and assistance to local health departments regarding food establishment licensing and inspection programs;
12. through the Division of Food Safety, ensure the diversion of eggs from a positive house to hard cooking or pasteurization. If necessary, the Division of Food Safety reserves the right to take control of eggs subject to diversion;
13. communicate and cooperate with all parties of this MOU in the investigation and management of an egg-associated SE disease outbreak;
14. provide news releases informing the public about safe food handling and food preparation; and
15. cooperate with all parties to this MOU in the development of educational programs and training for local health departments, industry and the public on safe food handling.

**The mission of the ODH: is to protect and improve the health of all Ohioans. In order to fulfill this MOU in regards to SE case reporting, outbreak investigation, and education, ODH will:**

1. collect and maintain statistics on reported human SE cases in Ohio;
2. consult with local health departments and assist in investigating outbreaks of food borne disease to identify factors contributing to the outbreak and support necessary actions to prevent further human cases;
3. communicate to ODA and USFDA the identification of potential SE outbreaks under investigation that may involve Ohio produced eggs, in order to facilitate and coordinate complete investigations;
4. provide consultation and assistance to local health departments regarding their food service operation licensing and inspection programs;
5. provide laboratory support by culturing patient stools for salmonella and testing incriminating foods as identified in an outbreak investigation;
6. cooperate with parties to this MOU in the development of educational programs and training for local health departments, industry and the public on safe food handling;
7. print and distribute information to the public on safe food handling;
8. coordinate responsibilities with local health departments;
9. request the assistance of ODA in any investigation which may involve retail distributors and producers;
10. assist the USFDA, as needed, in the investigation of an out-of-state outbreak linked to an Ohio producer;
11. may request USFDA to investigate any Ohio outbreak situation linked to eggs produced out-of-state; and
12. communicate and cooperate with all parties of this MOU in the investigation and management of an egg-associated disease outbreak.

**The mission of the OPA:** is to act upon the concerns and needs of the Ohio poultry industry by serving as the catalyst to enhance and promote Ohio's poultry industry for the mutual benefit of the poultry industry and consuming public. In order to fulfill this MOU and to orchestrate industry participation in the OEQAP, the OPA will:

1. consult with the Ohio State University Extension, and work in concert with ODA to provide technical and professional consultation to participants in the OEQAP, to include, but not be limited to, training and educational services;
2. provide a computer data base for the tracking of environmental and egg samples submitted to the ODA, Division of Animal Industry ADDL;
3. provide the suggested format for documenting BMP's for participants in the OEQAP;
4. communicate and cooperate with all parties to this MOU in the resolution of an egg associated SE disease outbreak in humans;
5. assist ODA in establishing and maintaining a system for random selection of OEQAP participants for audit review;
6. for audit purposes, provide ODA with an inventory of OEQAP participants identifying producer name, address, phone number, and contact name for the company;
7. develop, print and distribute consumer oriented food safety materials;
8. cooperate with all participants of this MOU in the development and delivery of educational programs and training for local health departments, industry, and the public relative to food safety;
9. mail out environmental test kits to producers;
10. mail/distribute environmental sample test results to producers;
11. provide guidance and follow-up on the resolution and/or correction of adverse audit findings for identified producers; and
12. manage and provide a process for certification of participants in the OEQAP, including the withdrawal of certification in the event of producer failure to abide by the OEQAP;
13. implement and maintain an annual re-certification of participants in the OEQAP that assures participants in the program are in good standing;

14. upon receipt of a positive egg sample resulting from a positive environmental sample, communicate on the same day, or next work day, the name and address of the identified processor to the ODA Division of Food Safety.

**The mission of the USDA APHIS/VS:** is to provide leadership in ensuring the health and care of animals and plants, improving agricultural productivity and competitiveness, and contributing to the national economy and public health. In order to fulfill this MOU, for the purpose of reducing SE, USDA APHIS/VS will:

1. through referral from ODA, cooperate and participate with all parties to this MOU in on-going training of field personnel, including but not necessarily limited to post cleaning and disinfect inspection and OEQAP sampling and auditing procedures;
2. through referral from ODA, assist in performing third party verification audits on participants in the OEQAP;
3. through referral from ODA, assist in performing post cleaning and disinfection inspections.

**The mission of the USFDA:** is to promote the public health by promptly and efficiently taking appropriate action on marketed regulated products in a timely manner. The agency will protect the public health by ensuring that foods are safe, wholesome sanitary and properly labeled. In order to fulfill this MOU in support of the OEQAP and food safety initiatives, the USFDA will:

1. provide guidance to all parties of this MOU in the furtherance of the food safety initiatives of the OEQAP;
2. provide legally available information concerning SE outbreaks;
3. maintain legal authority for: 1) trace backs to farm of origin, 2) on-farm investigations and, 3) testing of all eggs associated with SE outbreaks or cases involving interstate commerce, and endorsing the procedures described in the proposed USDA protocol established in 9 CFR Part 82, that was published in the Federal Register, Vol. 58, Number 146, dated August 2, 1993;
4. after the Center for Food Safety and Applied Nutrition (CFSAN) determines that an outbreak of SE has occurred and has an association with Ohio eggs, CFSAN will provide notification to the District USFDA, including SE egg traceback information related to Ohio processors or farms/flocks. The District USFDA will in turn provide written notification, to the extent legally permissible, of the SE outbreak and related egg traceback information to ODA and ODH;
5. make available to ODA and ODH, all legally available USFDA laboratory results of environmental testing and egg cultures related to an SE outbreak associated with Ohio eggs;
6. serotype all SE confirmed during any USFDA testing; and

7. cooperate with all parties to this MOU in the development of educational programs and training for local health departments, industry and the public on safe food handling.

**SE Outbreak Protocol:** In the event of a food borne SE outbreak traced to an Ohio producer/processor, all parties to this MOU agree to work cooperatively to do the following:

1. conduct a complete review of the identified producer/processors plan and test records within 60 days of a SE food borne outbreak;
2. if the identified producer/processor is a participant in the OEQAP, USFDA ( for eggs distributed interstate) and/or ODH ( for eggs distributed intrastate) has the option, upon review of the participants plan, verification records and test data, delegate ODA to conduct environmental and egg testing;
3. if the identified producer/processor is a participant in the OEQAP and the environmental test from a house is positive, all eggs from that house will be immediately diverted to pasteurization or hard cooking and a random sample of 1000 eggs from the identified house will be collected and tested. If this first sample is negative, then the eggs from the house may re-enter the whole shell market. Three (3) additional random 1000 egg samples will then be collected and tested at two-week intervals. If all four (4) samples in the set/series are negative, the flock will be monitored for the remainder of its productive life by random sampling and testing of 1000 eggs every three months.

If any of the samples are found to be positive, then the producer/processor must continue or resume diversion and testing of the eggs as stated above.

4. If the identified producer/processor is not participating in the OEQAP, the proposed USDA protocol established in 9 CFR Part 82, that was published in the Federal Register, Vol.58, Number 146, dated August 2, 1993, and/or the current approved protocol, will be followed.

All parties agree to designate a primary contact, or agency coordinator. Phone numbers and addresses will be exchanged.

All parties agree to attend planning and review meetings, with such meetings scheduled at least annually. All parties will share information, evaluate the effectiveness of the MOU and OEQAP and make recommendations for improving the MOU and OEQAP. Meetings may be requested by any party to this MOU to address issues that may impact any party of the MOU, or that may require assistance by one or all of the parties.

Cooperating parties will meet to plan and coordinate investigations of a food borne SE outbreak and evaluate recommendations for a course of corrective action.

In the event that any party to this MOU determines that their statutory duties require taking any action at variance with the foregoing measures, no provision of this MOU shall be construed as preventing them from taking actions they deem appropriate. In the event that any provision of this MOU conflicts with any law, rule or regulation, said law, rule or regulation shall prevail.

**Effective Date:** of this MOU is upon execution, and it will remain in effect until June 30, 2001, subject to the termination provisions contained in this MOU.

**Termination by Notice:** may be made by any party of this MOU upon issuance of a 30 days written notice to the other parties.

**Amendments:** to this MOU may be made, provided any such modifications or amendments are made in writing and signed off on by all parties of this MOU. It is agreed, however, that any amendments to the laws, rules or regulations cited, and or impacted herein, will result in the correlative modification of this MOU, without the necessity of executing another, or an amended MOU.

**Equal Employment Opportunity:** applicable federal, state and local laws and regulations will be complied with by all parties to this MOU in the conduct of work hereunder, including but not limited to Ohio Revised Code 125.11.

**Drug Free Workplace:** federal and state laws will be complied with by all parties of this MOU. By executing this MOU, all parties certify and affirm that, as applicable to each party, any subcontractor and/or independent contractor, including all field staff, associated with each party, agree to comply with all applicable laws requiring a drug-free work place.

All parties responsibilities and tasks identified in this MOU are dependent upon appropriated funds. If at any time any party determines that it no longer has either adequate funds or sufficient personnel to discharge its obligations under this MOU, that party's obligations under this MOU shall terminate upon notice to the other parties.

All terms and conditions of this MOU are embodied herein. No other terms and conditions will be considered a part of this MOU, with exception of the OEQAP (attached as Appendix A), unless expressly agreed upon in writing and signed by all parties.

All parties agree to resolve any disputes between the parties concerning responsibilities under or in performance of any of the terms of this MOU, as allowed by state or federal laws. In the event the non-federal government signatories cannot agree to an appropriate resolution to a dispute, the dispute may be submitted for Dispute Resolution conducted by the Ohio Department of Administrative Service. Disputes involving the Food and Drug Administration and the signatories of this MOU must be submitted to the FDA/Office of the Commissioner/Office of the Chief Mediator and Ombudsman.

State of Ohio  
Ohio Department of Agriculture

By: Fred L. Dailey  
Fred L. Dailey, Director

Date: 6-22-00

Witness: Cornie L. Ellis

State of Ohio  
Ohio Department of Health

By: J. Nick Baird  
J. Nick Baird, M.D., Director

Date: 7/26/00

Witness: Spencer Thompson

Ohio Poultry Association

By: \_\_\_\_\_  
Jack Heavenridge, Exec. Vice Pres.

Date: Jack Heavenridge

Witness: Kestie Stewart

United States Department of Agriculture  
Animal Health Inspection Service,  
Veterinary Services

By: \_\_\_\_\_  
Arnaldo Vaquer, D.V.M., AVIC

Date: \_\_\_\_\_

Witness: \_\_\_\_\_

United States Department of Health  
& Human Services, Food and Drug  
Administration, Cincinnati District

By: \_\_\_\_\_  
Henry Fielden, Director

Date: \_\_\_\_\_

Witness: \_\_\_\_\_

4/4/00 final

OHIO DEPARTMENT OF AGRICULTURE  
DIVISION OF ANIMAL INDUSTRY  
OEQAP LAYER HOUSE AUDIT

D

Company Name: \_\_\_\_\_ Company Representative: \_\_\_\_\_  
Business Address: \_\_\_\_\_ Title of Representative: \_\_\_\_\_  
City: \_\_\_\_\_ County: \_\_\_\_\_ Zip Code: \_\_\_\_\_ Date of Audit: \_\_\_\_\_  
Inspection Location: \_\_\_\_\_ Site No. \_\_\_\_\_ House No.(S) \_\_\_\_\_

Key Code: S - satisfactorily meets plan  
NI - needs improvement - somewhat meets plan  
U - does not meet plan  
F - is not addressed in plan  
NA - is not applicable to this operation

**REVIEW OF DOCUMENTATION:** (Instructions: Most of these records may be kept at a headquartered office of the producer. As a participant in the OEQAP, producers are required to make necessary records readily available to you during an audit review. Be sure you see the documentation and review it for completeness and relative accuracy.) **YOU MUST CIRCLE ONE RESPONSE CODE FOR EACH ITEM OR QUESTION.**  
*Comment sections must also be completed. If additional space needed for response, attach an additional sheet of paper, be sure to properly number your extended response to the corresponding issue or question.*

S NI U F NA 1. Certification of participation in OEQAP on file.  
Records of quality assurance training on file.  
Name and title of employee responsible for coordinating OEQAP and date of training:  
\_\_\_\_\_  
\_\_\_\_\_

S NI U F NA 2. NPIP documentation of SE monitored replacements.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

S NI U F NA 3. House population and depopulation dates are readily available.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

S NI U F NA 5. Is environmental sampling being done according to OEQAP?  
Comments: \_\_\_\_\_  
\_\_\_\_\_

S NI U F NA 7. A Rodent Control Program is in writing.  
Comments: \_\_\_\_\_  
Is routine baiting addressed in the plan? \_\_\_\_\_  
Is baiting activity monitored and documented? \_\_\_\_\_  
Are approved rodenticides being used? \_\_\_\_\_

S N I U F N A

8. A Pest Control Program is in writing.

Comments: \_\_\_\_\_

Is fly activity monitored? \_\_\_\_\_

Other pest activity monitored? \_\_\_\_\_

Are approved pest control products being used? i.e., Larvadex, etc. \_\_\_\_\_

Is activity documented? \_\_\_\_\_

S N I U F N A

9. A Biosecurity protocol is in writing.

Comments: \_\_\_\_\_

S N I U F N A

10. A Cleaning & Disinfection Program is in writing.

Comments: \_\_\_\_\_

Is there a dry clean and wet clean procedure? \_\_\_\_\_

Are all C& D activities documented, (dry & wet)? \_\_\_\_\_

Are approved C& D products used according to label directions? \_\_\_\_\_

S N I U F N A

11. A flock health monitoring program is in writing and addresses the use of medications, feed additives and pesticides according to approved label directions.

Comments: \_\_\_\_\_

Is SE vaccine used as part of a control program? Yes No

Is is used in pullets? Yes No Used in layers? Yes No

S N I U F N A

12. A feed sourcing program is in writing and incorporates practices to control SE in feed.

Comments: \_\_\_\_\_

S N I U F N A

13. A Manure Management protocol is in writing.

Comments: \_\_\_\_\_

Does it address manure removal on an environmental or egg positive house? \_\_\_\_\_

Does it include a manure removal schedule? \_\_\_\_\_

**VISUAL REVIEW OF HOUSE(S)**

**Do a walk through of the house or houses. Be sure to indicate the number of the house where discrepancies are observed when doing multiple houses. Be as specific as possible. Use an attached sheet if necessary. & to record the number of the question being expanded on any additional sheets used.**

**(Circle one response for each question) (Provide comments for clarification.)**

**S NI U F NA** 14. All live birds are caged.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

**S NI U F NA** 15. No dead birds are observed.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

**S NI U F NA** 16. No water leaks are observed. (If leak is observed note location.)  
Comments: \_\_\_\_\_  
\_\_\_\_\_

**S NI U F NA** 17. Attic is baited according to plan.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

**S NI U F NA** 18. Cage area is baited according to plan.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

**S NI U F NA** 19. Pit is baited according to plan.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

**S NI U F NA** 20. No dead or alive rodents are observed.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

**S NI U F NA** 21. Are rodent monitoring devices in place according to plan?  
Comments: \_\_\_\_\_  
\_\_\_\_\_

**S NI U F NA** 22. Manure levels appear to correspond with manure management plan and removal schedule.  
Comments: \_\_\_\_\_  
\_\_\_\_\_

S N I U F NA 23. Manure appears dry.  
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

S N I U F NA 24. Fly monitoring devices are in place according to plan. (i.e., white index cards, fly s1  
etc.)  
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

S N I U F NA 25. Fly control appears to be effective.  
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

S N I U F NA 26. Beetle control appears to be effective.  
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

S N I U F NA 27. Other pests are not observed.  
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

S N I U F NA 28. No accumulation of broken eggs were observed.  
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

S N I U F NA 29. The outside perimeter of the building is free of debris, grass, brush, & excessive  
standing water.  
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

AUDIT COMPLETED BY:

TITLE:

FOLLOW-UP ACTION RECOMMENDED: _____ _____ _____ _____ _____
---

**INSTRUCTION:** The original audit report shall be left with the producer, with the LSI or VMO submitting a copy of the audit to: The Ohio Poultry Association, OEQAP, 5930 Sharon Woods Blvd., Suite 102, Columbus, Ohio 43229.

**OHIO DEPARTMENT OF AGRICULTURE  
DIVISION OF ANIMAL INDUSTRY  
POULTRY FACILITY  
CLEANING AND DISINFECTION EVALUATION**

**Section I: Identification**  
 Producer: \_\_\_\_\_ Phone: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Flock ID: \_\_\_\_\_ Date: \_\_\_\_\_  
Month Day Year

**Section II: Procedures**

1. Which of the following cleaning and disinfection procedures were used? (Pick one)

A. Dry cleaning only <input type="checkbox"/>	D. Disinfection after washdown <input type="checkbox"/>
B. Washdown without disinfectant <input type="checkbox"/>	E. Disinfection after wash & drying <input type="checkbox"/>
C. Washdown with disinfectant <input type="checkbox"/>	F. Unknown <input type="checkbox"/>

2. Was the house fumigated?     
Yes No Unknown

**Section III: Results**

How much organic matter was present on the following surfaces? (Organic matter includes manure, feathers, eggs, other items that should be removed during cleaning and disinfection.)

	None or Slight	Moderate	Excessive	NA	Definitions
1. Cages					None or slight – matter not present or is visible only on close inspection.  Moderate – matter easily visible but present only in isolated areas.  Excessive – large amounts of matter visible throughout houses.  NA – equipment is not present.
2. Watercups					
3. Feeders					
4. Egg belts/elevators					
5. Drop boards					
6. Manure scrapers					
7. Ceilings/walls					
8. Walkways & stairs					
9. Fans & louvers					
10. Air Inlets					
11. Pit floor					
12. Pit ledges or walls					
13. Pit support beams					
14. Utility room					
15. Egg packing area					

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Was Outside of house cleaned?        Yes        No

Type of disinfectant: \_\_\_\_\_ Ratio: \_\_\_\_\_

**Section IV: Verifications**

Evaluator \_\_\_\_\_



# Ohio Department of Agriculture



Governor George V. Voinovich  
Lieutenant Governor Nancy P. Hollister  
Director Fred L. Dailey

Division of Food Safety  
8995 East Main Street • Reynoldsburg, Ohio 43068-339  
Phone: 614-728-6250 • Fax 614-644-072  
ODA home page: [www.state.oh.us/ag](http://www.state.oh.us/ag)

April 28, 1999

Ms. Alice Walters  
Ohio Poultry Association  
5930 Sharon Woods Road  
Columbus, OH 43229

Dear Alice:

As per our telecom of this morning, the following is forwarded for your information.

Ohio has no statute or rule that specifically prohibits the repackaging of shell eggs. However, this office has a current policy of prohibiting the practice at all levels except at the processing level for eggs either produced by the processor or eggs purchased by the processor. This excludes returning eggs to a processor for repackaging and it excludes repackaging eggs at a retail market.

**RATIONALE:** The intent of this policy is to prohibit the repackaging of eggs at a retail market: 1) If they have exceeded their original expiration or sell-by dates; 2) If there are too many restricted eggs in the lot; or 3) If customer handling during the display time generates too many restricted eggs. Also, there is usually insufficient equipment to perform the job of repackaging. The persons doing the task of repackaging could mix grades, sizes or lots with differing expiration, sell-by, dates. Because there is usually no means to adequately clean the eggs to be repackaged, and because mishandling of eggs during the repacking is common, more broken and leaker eggs may occur. This would increase the chance of spreading Salmonella enteritidis and possibly more food borne illness. In addition, no repackaging records have been available when the field inspectors have detected this practice. This situation is unacceptable from a regulatory viewpoint.

This office recommends that repackaging of shell eggs at the retail store level *not* occur. Further recommend the causes of the need to repackage eggs at retail be determined and reduced or eliminated.

Sincerely,

Roland R. Stewart, DVM, Chief  
Division of Food Safety

**Ohio Department of Agriculture  
Division of Food Safety  
8995 East Main Street  
Reynoldsburg, Ohio 43068**

---

**Memorandum of Interpretation  
Number 01-99/8**

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**Repackaging of Shell Eggs at Retail**

Shell eggs may be repackaged at retail if the provisions of sections 925.021 and 925.022 of the Ohio Revised Code are complied with as per Options #1 & #2 below.

**Option # 1 - Shell eggs in a container:** A person shall not sell, offer for sale, or expose for sale shell eggs in a container that is not labeled with:

1. The name and address of the retail establishment where repackaged;
2. An accurate statement of the quantity of the contents in terms of numerical count;
3. The date the shell eggs were processed (original pack date); and
4. If the retail store has the services of a grader, the correct grade and size or weight class of the contents in accordance with the standards adopted by this state; or
5. If the retail store does not have the services of a grader, the containers of shell eggs:
  - a. Shall be labeled "ungraded" or "unclassified";
  - b. May be labeled "mixed size" in lieu of a standard size and weight class adopted by this state.

**Option # 2 - Shell eggs from a bulk lot:** A person shall not sell, offer for sale, or expose for sale shell eggs from a bulk lot that is not:

1. Plainly marked with a placard with letters no less than one-half inch high designating the correct grade and size or weight class of the bulk lot in accordance with the standards adopted by this state. (To meet this provision the retail store must have the services of a grader.), or
2. If a retail store does not have the services of a grader, a bulk lot of shell eggs:
  - a. Shall be plainly marked with a placard having letters no less than one-half inch high which states "ungraded" or "unclassified";
  - b. May be plainly marked with a placard having letters no less than one-half inch high which states "mixed size" in lieu of a standard size and weight class adopted by this state.

Any questions regarding this memorandum should be directed to the Division of Food Safety at 1-800-282-1955 or 614-728-6250.

Main Commodity Code \_\_\_\_\_  
 Type \_\_\_\_\_ CTY \_\_\_\_\_ Num \_\_\_\_\_  
 # \_\_\_\_\_ Exp Date \_\_\_\_\_

OHIO DEPARTMENT OF AGRICULTURE  
 DIVISION OF FOOD SAFETY  
 Reynoldsburg, Ohio 43068  
 614-728-6250

Samples  Y  N  
 Photos  Y  N  
 Priority  1  2

Other Commodities

Code \_\_\_\_\_

Type \_\_\_\_\_

Lic # \_\_\_\_\_

Exp-date \_\_\_\_\_

### INSPECTION REPORT

Date Last Inspection \_\_\_\_\_

(S) Satisfactory, (U) Unsatisfactory,  
 (X) Does not apply, (R) Remarks

Violations?  Y  N

1-Rodents  7-Sanitation  
 2-Insects  8-Structure  
 3-Birds  9-Contamination  
 4-Labeling  A-Infestation  
 5-Disaster  B-Adulteration  
 6-Personnel  C-Other

Date Inspected \_\_\_\_ / \_\_\_\_ / \_\_\_\_  
 Type Inspection  1-ODA  2-FDA  
 (also check one below)  
 1-Routine  3-Compliance  5-Other  
 2-Limited  4-Complaint

Notice?  Y  N Days \_\_\_\_\_  
 Embargo?  Y  N  
 Voluntary Destruction?  Y  N  
 Description \_\_\_\_\_

Check if:  New Firm  Out-of-Business  Change in name,  
 address or telephone

Sanitary Laws Posted?  Y  N

Firm		Address			
City	State	Zip	Phone		

	S	U	X	R		S	U	X	R
<b>PLANT &amp; PREMISES:</b>					<b>STORAGE</b>				
1. CONSTRUCTION					13. PALLETIZING				
2. LOCATION & SURROUNDINGS					14. DRY STORAGE				
3. DOCK AREA					15. ROTATION OF PRODUCTS				
<b>LOCKER &amp; RESTROOMS:</b>					<b>GENERAL CLEANING:</b>				
4. FLOORS, WALLS & CEILING					16. CLEANING SUPPLIES				
5. DOORS, WINDOWS & VENTILATION					17. SANITIZING AGENTS				
6. FACILITIES					<b>GENERAL:</b>				
<b>PROCESSING:</b>					18. PESTS & PEST CONTROL				
7. FLOORS, WALLS & CEILING					19. EMPLOYEES				
8. EQUIPMENT & VENTILATION					<b>LABELING:</b>				
9. LIGHTING					20. RAW PRODUCTS				
10. WASTE DISPOSAL & WATER					21. FINISHED PRODUCT & WTS.				
<b>REFRIGERATION &amp; TEMPERATURES:</b>					<b>SALES AREA:</b>				
11. HOLDING & STORAGE & CHILL					22. DISPLAY CASES & FLOORS				
12. FREEZING					23. FOOD DISPLAY & SHELVES				

REMARKS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

AUTHORIZED FIRM SIGNATURE	TITLE	INSPECTOR
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*Ohio Poultry Association*  
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*FDA Docket Mgt. Branch (HFA-305)*  
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 Rockville, MD

20852

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