

# United States Senate

WASHINGTON, DC 20510

SEP 21 4 00 PM '00

September 11, 2000

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

Re: FDA, Docket Number 00N0504

Dear Sir or Madam:

We write in support of the position of Hawaii egg producers that *Salmonella Enteritidis* (SE) reduction is adequately addressed in the Hawaii Egg Quality Assurance Plan and that the strategies set forth in the Egg Safety Action Plan in the above-mentioned dockets, if implemented, would severely and unnecessarily curtail production of eggs in Hawaii.

By national standards, the Hawaii egg industry is small with production being approximately about 148 million eggs per year. The industry's size, however, belies its importance since about two-thirds of the eggs consumed in Hawaii are produced locally. Several segments of Hawaii's population have expressed a preference for fresh, Hawaii-produced eggs.

Unable to enjoy economies of scale, the Hawaii egg industry also operates in a pocket without export opportunities, and is too small to justify egg breaking or pasteurization facilities. As a result, no egg products are manufactured and the industry does not re-process and repack outdated eggs. Further, chicks for egg production are air-shipped from the West Coast and all packing materials and feeds are imported from the continental United States by ocean freight. Through these imports, Hawaii egg producers use SE-controlled feed and chicks from SE-monitored programs.

The high cost and market isolation of the Hawaii egg industry render it economically fragile, even though healthy and vital to Hawaii consumers. The protocols being proposed in the Egg Safety Action Plan are not practical for an industry of the size and structure that we have in Hawaii. The small scale of

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operations would make costs much too high to be competitive and there are no viable alternatives available for the diversion of locally-produced eggs not qualifying for the fresh market.

We recognize and acknowledge that safe and healthful egg production and handling practices are in the public interest. Rather than a national program that might be applicable to other regions of the country, we have been assured that the SE issues are addressed by the Hawaii Egg Quality Assurance Plan. We are further convinced of this position by the commitment of the Hawaii Department of Agriculture to work closely with our local producers to ensure that eggs produced and marketed in Hawaii meet the national standard for egg safety.

Given the size and structure of the Hawaii egg industry, the protocols being proposed under the national Egg Safety Action Plan would have severe and undesirable consequences. There are, however, alternative protocols that would achieve the same goals. Within applicable rules and regulations, we urge you to allow Hawaii growers the option of following the protocols articulated in the Hawaii Egg Quality Assurance Plan as a more viable way to ensure on-farm detection of SE contamination and to minimize the risk of contaminated eggs reaching consumers.

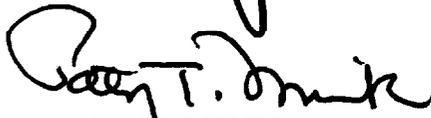


DANIEL K. INOUE  
United States Senator

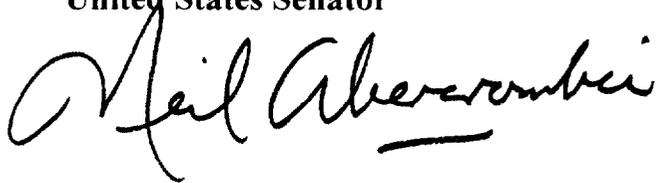
Aloha,



DANIEL K. AKAKA  
United States Senator



PATSY T. MINK  
Member of Congress



NEIL ABERCROMBIE  
Member of Congress

**UNITED STATES SENATE**

WASHINGTON, DC 20510-1102

OFFICIAL BUSINESS

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