



# GLOBAL POULTRY MARKETING SERVICES

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November 29, 2004

Division of Dockets Management  
Food & Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Docket nos. 1996P-0418, 1997P-0197, 1998P-0203 and 2000N-0504

Dear Sirs or Madam:

I am writing to comment on the Food & Drug Administrations proposed rule on Salmonella Enteritidis in shell eggs. My company, Global Poultry Marketing Services, sells and services day old Brown Shell Egg Layer chicks exclusively. Sales are to small producers who produce organic, free range, cage free and natural eggs for direct and local marketing. My company sells chicks mainly in a 5 state area with occasional sales in two others. I am addressing that part of the FDA proposed ruling that excludes producers who sell all of their eggs directly to consumers or producers with fewer than 3,000 laying hens.

I am concerned as to what right the FDA has to segregate egg producers from the rest of the industry due to the number of hens they keep. My small producer customers have worked hard to be part of our national poultry industry and have every right to participate in all programs and rulings set about by the Federal Government equally. Their egg customers should be given the same protection against disease as those customers buying from a million bird location at a supermarket under any proposed federal ruling. This part of the proposed ruling smacks of determined discrimination.

An example taken, one of my small family farm egg producers customers who produces brown shell eggs has under 3,000 hens – sells his eggs direct to consumers in two of the ten Farmers Markets in the Twin Cities of St. Paul and Minneapolis – he also sells his eggs to several small country grocery stores and gas stations and two rural bakery shops plus summer lake camps for children and one Veterans Summer Camp. Would he have to give up part of his customer base in order to remain out of the program, or just go out of business.

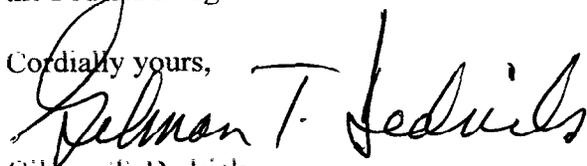
My small egg producer customers have voiced concern that not being fully part of any new program could be used against the consumption of eggs from their farms. No

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illusory computer based FDA projections on their exposure to SE would ever overcome the vexation and loss of market to the small egg producer. They are all keenly aware of SE and are adopting several popular volunteer prevention programs thanks to the efforts of our state agencies and poultry organizations. This exemption rule looks like a disaster in the making for small producers. I urge you to carry out inspections and enforcement through our federal and state agencies already in place and give them the full backing of the Federal Drug Administration.

Cordially yours,

A handwritten signature in cursive script that reads "Gilman T. Dedrick". The signature is written in black ink and is positioned to the right of the typed name.

Gilman T. Dedrick  
President