



# United Egg Producers

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Dear Ms. Branch:

Thank you again for meeting with us last week and giving us an opportunity to present written comments we previously submitted to the Food and Drug Administration (FDA) concerning the egg safety rule, which the agency proposed in September 2004.

During the meeting, we noted that the U.S. shell egg industry has introduced numerous measures to control *Salmonella* Enteritidis (SE) in shell eggs. Some of those measures – the various state Egg Quality Assurance Plans, for example – were referenced in the 2004 FDA proposal. The agency drew some of its proposed requirements from those voluntary state plans. In the years since FDA published the proposed egg safety rule, the industry has continuously improved food safety measures in egg production and processing. Earlier this year, we surveyed United Egg Producer (UEP) members on the status of their SE control programs and would like to share with you general observations made from that survey.

Producers representing approximately 50% of the table egg production in the United States completed the UEP survey. While individual responses are confidential, observations made from the summarized information that are relevant to our earlier comments on the FDA proposal include the following:

- All of the survey respondents have an egg quality assurance plan for the prevention and control of SE. In states where the responsible state agency (usually the agriculture department) has an official state plan, producers are voluntarily participating in that plan. In states where an official plan is not



Official U.S. Council Representative

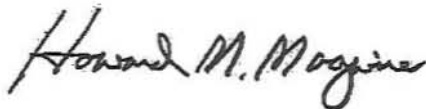
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- yet in place, producers are using either a UEP or a company-developed plan.
- All of the survey respondents are obtaining their chicks only from hatcheries that the U.S. Department of Agriculture's National Poultry Improvement Plan has classified as - *U.S. Senteritidis Clean*.
  - All of the survey respondents have biosecurity plans in place. These plans include protocols for the movement of poultry, personal and equipment, pest control programs, and cleaning of layer houses after every flock.
  - The producers reported that they have refrigeration equipment and practices for nest run eggs (freshly laid eggs to be washed and graded) commensurate with the food safety or quality risk. For example, the majority of production today is "inline." In these facilities eggs move directly from the layer house on conveyors to the processing washing, grading and packing operation where they are refrigerated immediately after packing.
  - Almost 100% of the producers responding have testing programs for SE.
  - Over 90% of the producers conduct a vaccination program for SE.

Thank you again for the opportunity to describe some of the practices that U.S. producers have employed to assure the safest egg supply in the world. If we can clarify any of this information, please contact us.

Sincerely,



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