



**SPARBOE**  
Companies

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November 16, 2004

Docket Clerk  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
Room 102, Cotton Annex  
300 12<sup>th</sup> Street S.W.  
Washington, D.C. 20250

Re: Docket Number 04-034N: Draft Risk Assessments of *Salmonella*  
*Enteritidis* in Shell Eggs and *Salmonella* spp. in Egg Products

Dear Sir or Madam:

Sparboe Companies is an egg producer, processor and further processor of eggs with operations in Minnesota, Iowa, and Colorado. We currently own 13,000,000 layers and are the fifth largest egg producer in the United States. We operate seven egg grading facilities and three further processing facilities. We are dedicated to providing a safe product to our customers. We have developed and implemented HACCP plans, follow the United Egg Producers Five-Star Quality Assurance Program, utilize the USDA in-plant grading service and consider food safety a cornerstone of our quality egg program.

We appreciate the opportunity to comment on the Food Safety and Inspection Service (FSIS) Docket No. 04-034N "Draft Risk Assessments of *Salmonella* Enteritidis in Shell Eggs and *Salmonella* spp. in Egg Products." We believe that a number of issues still need to be addressed. Among those issues/concerns we deem the following as most critical:

An oversight of the risk assessment is the omission of a *Salmonella* Enteritidis vaccination program as a control measure. With hundreds of flocks currently being vaccinated and after the results in Great Britain, we believe there is sufficient data to incorporate vaccination as a viable alternative to some of the other control measures.

Another concern we have is with the estimated number of illnesses attributed to egg products each year, since there has not been any reported illnesses and no outbreaks in the 34 years of mandatory FSIS inspected pasteurization. The Validation of the Egg Products Model states that the number of human illnesses due to pasteurized egg products is too high with the absence of epidemiological data. We agree with this assessment.

Sparboe Companies also requests that comments and review by the Food and Drug Administration (FDA) and Centers for Disease Control and Prevention (CDC), in addition to any outstanding comments from the peer reviewers be incorporated into the document prior to another public comment period. It will be very important to the industry to review the documents again after those changes have been made.

We appreciate the opportunity to comment on the Assessments, and would be pleased to provide further information to the U.S. Department of Agriculture to support attempts to increase food safety.

Respectfully submitted,

A handwritten signature in black ink that reads "Brian Joyer". The signature is written in a cursive style with a large, prominent initial "B".

Brian Joyer  
Quality Assurance Supervisor  
Sparboe Companies  
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