

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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Agenda Item 5 (a)

CX/FH 06/38/05  
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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

Thirty-eight Session

Houston, Texas, U.S.A, December 4 – 9, 2006

#### COMMENTS AT STEP 6 ON THE

#### DRAFT REVISION OF THE CODE OF HYGIENIC PRACTICE FOR EGGS AND EGG PRODUCTS (CAC/RCP 15-1976)

In response to CL 2005/42-FH Australia, European Community, Guatemala, Japan, Thailand, New Zealand, United States of America, and ICMSF submitted comments on the revised Code.

#### GENERAL COMMENTS

##### UNITED STATES OF AMERICA

We are generally very pleased with and strongly support this Draft Code of Hygienic Practice for Eggs and Egg Products.

#### INTRODUCTION

##### FIRST PARAGRAPH

##### AUSTRALIA

In the first sentence delete, “International” and italicizes the title “Code of Hygienic Practice for Eggs and Egg products” throughout the document. In second sentence delete “the” and substitute “This.” In the bullet point, italicize “Risk Assessment ...and broiler chickens.”

##### SECOND PARAGRAPH

##### UNITED STATES OF AMERICA

In the third sentence of the second paragraph, we suggest replacing the phrase “egg producing bird” with the word “avian.” In the next sentence, we suggest deleting the words “a” and “one.”

**LAST PARAGRAPH****AUSTRALIA**

At the end of last sentence add “, Rome, Italy 30 April – 4 May 2001.”

**1 OBJECTIVES****AUSTRALIA**

In first sentence and throughout the document reformat “*Recommended International Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1- 1969, Rev. 4, 2003)” to read “*Recommended International Code of Practice - General Principles of Food Hygiene* (CAC/RCP 1- 1969, Rev. 4, 2003).”

**2.1 SCOPE****FIRST PARAGRAPH****AUSTRALIA**

At the end of the paragraph, capitalize “c.”

**NEW ZEALAND**

New Zealand recommends that the word “shell” is added before “eggs” in the first statement under this heading and that the last statement is deleted, as it is then unnecessary. The current wording is confusing as it limits the scope to just eggs in the shell.

**UNITED STATES OF AMERICA**

We recommend changing the first sentence in this section to read, “This Code applies to the primary production, sorting, grading, storing, transport, processing, and distribution of eggs in the shell and egg products of such eggs produced by domesticated birds and intended for human consumption, “ since this Code covers egg products in addition to eggs in the shell.

**SECOND PARAGRAPH****JAPAN**

This statement is inconsistent with the title of this Code as well as with the 1<sup>st</sup> paragraph of Scope, because the 2<sup>nd</sup> paragraph does not cover egg products. Japan suggests removing this paragraph.

**UNITED STATES OF AMERICA**

We recommend deleting the sentence, “This Code applies to eggs in the shell, produced by domesticated birds, for human consumption,” since this is captured in the first sentence.

**2.2 USE OF THE DOCUMENT****SCOND PARAGRAPH****AUSTRALIA**

First sentence, at the start of the sentence capitalize “c” and change “*Codex*” to “Codex”

**SIXTH PARAGRAPH****UNITED STATES OF AMERICA**

We recommend deleting the words “a” and “one” in the sixth sentence.

**“Recognition of the Production and Processing of Eggs by Small-Scale/Less Developed Egg Producers/Businesses.”**

**AUSTRALIA**

Number the above title “2.2.1”

**SECOND PARAGRAPH**

**UNITED STATES OF AMERICA**

We suggest changing “these” to “the” in the first sentence of second paragraph.

**FOURTH PARAGRAPH**

**AUSTRALIA**

Change “the” to “this”

**2.3 PRINCIPLES APPLYING TO THE PRODUCTION, HANDLING AND PROCESSING OF ALL EGGS AND EGG PRODUCTS**

**AUSTRALIA**

Throughout this section, change from “bullet format” to “Normal format.”

**FIRST PARAGRAPH**

**UNITED STATES OF AMERICA**

We suggest deleting “and practicable” in the first sentence since a method that is not practical is not appropriate.

**THIRD PARAGRAPH**

**AUSTRALIA**

First sentence, change “*the*” to “*this*”

**SIXTH PARAGRAPH**

**AUSTRALIA**

Second sentence, change “*the*” to “*this*”

**2.4 RELATIVE ROLES OF EGG PRODUCERS, PROCESSORS AND TRANSPORTERS**

**SECOND BULLET**

**UNITED STATES OF AMERICA**

We suggest adding “distributor, transporter, or warehouse” to the end of the second bullet point.

**THIRD BULLET**

**AUSTRALIA**

First sentence, add a space before and after hyphen and delete the text in parenthesis.

**UNITED STATES OF AMERICA**

At the end of the first sentence add “or those required by the competent authority.”

**2.5 DEFINITIONS:**

**AUSTRALIA**

First paragraph, second sentence capitalize the letter “c” in the word “code.”

**GUATEMALA**

Add a definition for Egg; “Egg – It is an oval shaped product produced as a result of bird laying. Its components are shell, membrane, yolk and white and it is destined for human consumption.”

**UNITED STATES OF AMERICA**

Adding a definition for Avian; “Avian – members of the class Aves”

***Domesticated birds*****UNITED STATES OF AMERICA**

Replace the word “managed” with “kept.” Our concern is that the word “domestic” has various meanings in different countries, and we do not believe using only the word “managed” in the definition adequately clarifies the meaning.

***Incubator egg*****GUATEMALA**

Modify the definition of the Incubator Egg to read; “*Incubator Egg* – It is a fertile egg that is usually destined for incubation for the production of birds.”

***Table egg*****UNITED STATES OF AMERICA**

Changing the definition for “table egg” to “an egg destined to be sold to the end consumer in its shell that, after being laid, has not received any treatment that significantly modifies its functional properties (e.g., foaming, whipping of whites, emulsification potential, binding).” Our goal is to allow eggs from hens fed a special diet and eggs that have received an effective microbiocidal treatment that enhances microbiological safety without altering general recognized functional properties to be called table eggs.

**3 PRIMARY PRODUCTION****EUROPEAN COMMUNITY**

Interventions at primary production to prevent, eliminate or reduce the frequency and extent of *Salmonella* contamination can be very effective in reducing the incidence of human salmonellosis caused by consumption of contaminated eggs. In line with the recommendations made for eggs coming from infected flocks, consideration should be given to incorporate further guidance on positive flock management.

**FIRST PARAGRAPH**

First paragraph, second sentence, delete “the “ and replace it with “this.”

**FOURTH PARAGRAPH****UNITED STATES OF AMERICA**

We suggest deleting the word “on” between “impact” and “the,” and in the third sentence of the tenth paragraph, we suggest replacing “producers” with “production.”

**FIFTH PARAGRAPH****AUSTRALIA**

Second sentence, italicize “Entertidis.”

### 3.2.1 Flock Management and Animal Health

#### FOURTH PARAGRAPH

##### GUATEMALA

Second sentence, in parenthesis delete “avicolas” and substitute “aviares.”

Guatemala suggests using the term “aviares” in the Spanish version, because the term the bird term “avicolas” refers to the industry.

#### SIXTH BULLET

##### NEW ZEALAND

Bullet 6 states “Treating birds only with veterinary drugs permitted for the specific use, prescribed by a veterinarian...” This is limiting as not all drugs have been assessed for specific uses, especially for minor species. New Zealand permits the ‘off-label’ use of licensed animal remedies on species that do not appear on the label, so long as they are prescribed by a veterinarian (who ensures that there are no food safety issues in terms of either Food or residue Regulations). New Zealand therefore recommends deleting the words “permitted for the specific use” from this bullet point.

#### EIGHTH BULLET

##### UNITED STATES OF AMERICA

In the eighth main bullet point, we recommend adding the following sentence after the first sentence: “If a vaccine is used, it should be approved by the competent authority” to ensure that only approved vaccines are used. In the ninth main bullet point, we recommend inserting “SE” before “infected flock.”

#### NINTH BULLET POINT

##### EUROPEAN COMMUNITY

After the ninth bullet point (beginning with "Disposing of eggs..."), the European Community would propose to insert a new bullet point as follows:

- “• *Destruction of Salmonella positive flocks or slaughter and special treatment of the meat from these positive flocks in accordance with country requirements.*”

#### Footnotes 2, 3 and 4

##### AUSTRALIA

Revise the foot notes 2, 3 and 5 to read as follows:

**Footnote 2:** CX/FH 05/37/10- *Discussion Paper on the Guidelines for the Application of the General Principles of Food Hygiene to the Risk-Based Control of Salmonella spp. in Broiler Chickens* is being reviewed by the Codex Committee on Food Hygiene.

**Footnote 3:** *Joint FAO/WHO Expert Consultation on Risk Assessment of Microbiological Hazards in Foods*, FAO Headquarters, Rome, Italy 30 April – 4 May 2001, page 13.

**Footnote 4:** *Code of Practice to Minimize and Contain Antimicrobial Resistance* (CAC/RCP 61-2005).

### 3.2.2 Areas and Establishments for Egg Laying Systems

#### FOURTH PARAGRAPH

##### EUROPEAN COMMUNITY

The sentence just before the bullet points in point 3.2.2 now reads: “*The following could be considered, where practicable, in the assessment of areas and establishments used for egg laying:*”

The word “could” was inserted in the place of “should” during the last plenary meeting. From the European Community’s viewpoint “**should**” should be reinserted, as it is only a question of considering (“*should be considered*”) and enough freedom is foreseen with the phrase “*where practicable*”. The very basic points of hygiene, layout and cleaning of the establishment in the following bullet points certainly should be considered. Then consequent actions could be taken.

#### FIRST BULLET

##### NEW ZEALAND

New Zealand recommends that “animals” should be replaced by “the birds” in the first bullet.

#### FOOT NOTE 6

##### AUSTRALIA

Change the footnote 6 to read as follows: “Evaluation of the importance of such interventions for reducing the risk of human illness based on existing data was inconclusive. *Joint FAO/WHO Expert Consultation on Risk Assessment of Microbiological Hazards in Foods*, FAO Headquarters, Rome, Italy 30 April – 4 May 2001, page 17”

### 3.2.3.1 Watering

#### FIFTH PARAGRAPH

##### NEW ZEALAND

The paragraph and associated bullet points about re-use of water are more relevant in the context of egg-washing. New Zealand recommends that these are moved to the second bullet under the heading “Washing, disinfection and drying” in section 5.2.2.1.

### 3.2.3.2 FEEDING

#### FIRST PARAGRAPH

##### NEW ZEALAND

New Zealand recommends that in the first paragraph, a comma is inserted after “into eggs”, so that it is not the eggs that present an unacceptable health risk to the consumer or adversely affect the suitability of eggs and egg products

### 3.2.3.3 Pest control

#### FIRST PARAGRAPH

##### NEW ZEALAND

New Zealand recommends that the first paragraph is amended to the following to aid readability: “Pests are recognized as vectors for pathogenic organisms, so they should be controlled using a properly designed pest control program.”

**FIRST BULLET****Second sub-bullet****NEW ZEALAND**

New Zealand recommends that the following sentence is deleted from the second sub-bullet as it is unnecessary and impractical during feed use: “Feed should be kept in pest proof containers.”

**SECOND BULLET****UNITED STATES OF AMERICA**

In the second main bullet point, we recommend adding the phrase “or otherwise placed” between “stations” and “so” and deleting the phrase “or insects.” In the U.S., bait is placed in stations if it is in an area where the birds could access it, such as on the floor. However, if it is placed in the rafters or on the walls, where it is not accessible by the birds, it may not be placed in a station.

Additionally, we are recommending the words “or insects” be deleted, since most insects, because of their size, will be able to access bait, whether or not it is placed in a station.

**3.2.3.4 Agricultural and Veterinary Chemicals****SIXTH BULLET****AUSTRALIA**

At the end of the sentence add a period (“.”)

**SEVENTH BULLET****UNITED STATES OF AMERICA**

In the seventh bullet point, we suggest inserting the words “national legislation and/or” before “the manufacturer’s directions,” so that, if national legislation is in place, it is followed.

**3.3 Collection, Handling, Storage and Transport of Eggs****SECOND PRINCIPLE****GUATEMALA**

Delete the word “Appropriate” and substitute “Hygienic.” Guatemala is of the opinion that use of the word is “Hygienic” is clearer than use of the word “Appropriate.”

**FIRST BULLET****UNITED STATES OF AMERICA**

We recommend changing the first bullet point to read, “Dirty eggs may be used for table eggs if permitted by the competent authority, in accordance with country requirements, when such eggs are appropriately cleaned prior to packing.”

**SECOND BULLET****UNITED STATES OF AMERICA**

We recommend changing the second bullet point to read, “Cracked eggs should be excluded from the table egg trade and should be directed to a processing establishment, as appropriate, as soon as possible after collection.”

### **3.3.2 Packaging and storage:**

#### **FOURTH PARAGRAPH**

##### **UNITED STATES OF AMERICA**

We suggest inserting the phrase “constructed according to sound sanitary design characteristics including being” between “be” and “corrosion” in the fourth paragraph.

### **3.3.3 Transport, Delivery Procedures and Equipment**

#### **PRINCIPLE**

##### **JAPAN**

Current principle reads: “Whenever eggs are transported, it should be in a manner that minimizes damage to the egg or eggshell and avoids the introduction of contaminants in or on eggs.” Growth of pathogens, which may take place during transportation and delivery, should also be minimized. Therefore Japan suggests adding “microbial growth and” before “the introduction of contaminants in or on eggs”.

### **3.4.1 Cleaning and maintenance of egg laying establishments**

#### **FOURTH PARAGRAPH**

##### **UNITED STATES OF AMERICA**

In the fourth paragraph, we suggest deleting the word “contaminated” and the phrases “from diseased birds,” and “and dead or diseased birds.” These changes will provide for the disposal of all litter, not just contaminated litter, all nesting materials and faeces, not just that from diseased birds, and, where necessary, eggs from infected flocks.

#### **3.4.2.1 PERSONNEL HYGIENE**

##### **THIRD PARAGRAPH**

##### **NEW ZEALAND**

New Zealand recommends some flexibility is added into the third paragraph by using a term such as “minimize” rather than “prevent”, as complete prevention of hazard introduction is probably unrealistic. An alternative could be to delete this paragraph as the following one adequately captures its intent.

#### **3.4.2.3 Personal cleanliness**

##### **SECOND PARAGRAPH**

##### **AUSTRALIA**

After “...return ...anything ...” delete “of”

## **3.5 DOCUMENTATION AND RECORD KEEPING**

#### **TITLE**

##### **NEW ZEALAND**

This section should be consistent with Codex general principles headings, i.e. Documentation and Records.



**FIRST BULLET****GUATEMALA**

Once again in the Spanish version the word “avian” is translated as “avicolas”, replace the term avicolas” with “aviares.”

**NINTH BULLET****EUROPEAN COMMUNITY**

Concerning the word “traceability” in square brackets (**Section 3.5**, ninth bullet point), the European Community wishes to refer to:

- the definition of “*Traceability/Product Tracing*” of the *Codex Procedural Manual*, 15<sup>th</sup> edition, page 44;
- the “*Principles for the Application of Traceability/Product Tracing*” discussed at the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS).

The European Community is of the opinion that terms defined in the *Codex Procedural Manual* should not be put in square brackets.

**Footnote 8****AUSTRALIA**

Revise the Title to read “Proposed Draft *Principles for Traceability / Product Tracing as a Tool Within a Food Inspection and Certification System*. (Alinorm 06/29/30, Appendix III)”

**4 ESTABLISHMENT: DESIGN AND FACILITIES****THIRDPARAGRAPH****NEW ZEALAND**

The third paragraph states: “Where practicable, separate areas should be allocated for:”. This is followed by a number of bullet points. New Zealand seeks clarification on whether the intent is to recommend separation between the areas described within each bullet, or between areas described in different bullets (or both).

**5 CONTROL OF OPERATION****THIRD PARAGRAPH****AUSTRALIA**

Modify the first sentence after “...those aspects of the” to read; “HACCP Annex to the *Recommended International Code of Practice - General Principles of Food Hygiene*, ...”

**5.1 CONTROL OF FOOD HAZARDS: EGG PRODUCTS**

**Eggs and egg products should be safe and suitable.**

**AUSTRALIA**

Revise the footnote 9 to read: “Refer to definition of food safety and food suitability in the *Recommended International Code of Practice - General Principles of Food Hygiene*, Section 2.3 Definitions.”

**NEW ZEALAND**

New Zealand recommends that the first paragraph is amended to read “Eggs used for table eggs and for processing into egg products should be safe and suitable.”

On page 17 of the document ALINORM 05/28/13 it states: “152. Considering the fertile eggs marketed for human consumption in several countries and the need to differentiate between eggs for hatching and fertile eggs, it was agreed that “eggs intended for hatching” should be considered to be unsafe or unsuitable eggs for human consumption.”

New Zealand seeks clarification on the difference between incubator eggs, and eggs intended for hatching. New Zealand considers that fertile eggs that have been incubated should be listed as unsafe/unsuitable eggs, but that fertile eggs that have not been incubated could be safe and suitable for human consumption. It is possible that the new wording could be interpreted to mean that excess fertile eggs, that were originally intended for hatching, but which have not been incubated, are unsafe/unsuitable. This does not seem to reflect the intent described under statement 152 above.

**TABLE EGG****NEW ZEALAND**

New Zealand recommends that the heading “Table Egg” is moved to be below the bullets defining unsafe and unsuitable eggs as this definition applies equally to table eggs and egg products (as shown by the addition of the last bullet under the “egg products” heading.

**FIRST BULLET****GUATEMALA**

Replace “Incubator eggs” with “fertile incubated eggs.”

**FIFTH BULLET****UNITED STATES OF AMERICA**

Change the sentence to “Eggs intended for hatching, unless produced and processed in accordance with the recommendations in this Code”. We agree that incubator eggs are unsafe and unsuitable, but eggs, simply because they are produced with the intention of going to a hatchery, should not be prohibited from the table egg market, as long as they are produced in accordance with the Code. Unless they are placed in an incubator, these eggs are perfectly safe and suitable for use as table eggs. In the U.S., surplus hatching eggs may be diverted to the table egg market, depending on market conditions.

**LAST PARAGRAPH UNDER TABLE EGG****UNITED STATES OF AMERICA**

First sentence, replace the word “avoid” with “minimize.”

Second sentence, replacing the phrase “if cleaned appropriately” with the phrase “when such eggs are appropriately cleaned prior to packing.”

## **EGG PRODUCTS**

### **FIRST BULLET**

#### **AUSTRALIA AND THAILAND**

Replace “and” with “or”

#### **NEW ZEALAND**

New Zealand recommends that “...and be disposed of” is changed to “or be disposed of” to more accurately reflect normal industry practice.

#### **UNITED STATES OF AMERICA**

Changing the first bullet point to read, “Cracked or dirty eggs that are not suitable for human consumption as table eggs should be directed to processing (e.g. cleaning or breaking followed by a microbiocidal treatment) or be disposed of in a safe manner.”

### **SECOND BULLET**

#### **AUSTRALIA, THAILAND AND UNITED STATES OF AMERICA**

Replace the “or” with “and.”

### **LAST PARAGRAPH**

#### **AUSTRALIA**

Replace “the” with “this.”

### **5.2.1 Temperature and time issues**

#### **FOURTH PARAGRAPH**

#### **AUSTRALIA**

Last sentence delete “Salmonella Enteritidis (SE) and replace it with “SE.”

### **5.2.2.1 Processing of table eggs**

#### **SECOND PRINCIPLE**

#### **NEW ZEALAND**

New Zealand recommends that this is amended by deleting the word “sorting” as dirty eggs could get through to the sorting process and be segregated out at that step, not always prior to it.

#### **(i) *Sorting Grading and Packing***

#### **FIRST PARAGRAPH**

Australia

After “...or were ..either the table” add “egg”

#### **FIFTH PARAGRAPH**

#### **UNITED STATES OF AMERICA**

We suggest clarifying the third paragraph under the third principle by changing the word “process” to “method,” since “process” is also used to describe the activities that eggs and egg products undergo, such as sorting, grading, and packing.

**Washing, disinfection and drying****FIRST BULLET****UNITED STATES OF AMERICA**

We recommend changing the first bullet point under “washing, disinfection and drying” from “Eggs should not be soaked prior to or during washing” to “Washing procedures should avoid external contamination being forced or drawn into the egg contents.” Our concern is related to the multiple definitions/connotations associated with the word “soaked.” We feel to use this word we would need to articulate the scientific basis of the requirement, including in the definition the specific time and temperature conditions that need to be avoided. We believe that becomes too prescriptive and that it can be avoided by simplifying the construction of the sentence to the goal of the activity.

**(iv) Shelf life for table eggs****SECOND BULLET****UNITED STATES OF AMERICA**

In the second bullet point under “Shelf life for table eggs,” we suggest deleting the words “methods and” before “treatments.” While table eggs may receive a “treatment” (such as in-shell pasteurization or irradiation), it is unclear what is meant by “methods.”

**LAST BULLET****AUSTRALIA**

Replace “microbiological” with “microbial.”

**5.2.2.2 Egg Product Processing:****FOURTH PRINCIPLE****AUTRALIA**

After “...from equipment, and” delete “that permits” and substitute “permit”

**UNITED STATES OF AMERICA**

We propose the following alternate language for the fourth principle: “Separating the egg contents from the shell should be done in a manner that avoids cross-contamination between the exterior surface of the shell and the egg contents, avoids contamination by personnel or equipment, and permits individual examination of the egg including, whenever feasible, the egg contents.” As you are aware, the United States has traditionally had concerns about the use of centrifugation to separate egg contents from shell after breaking of multiple eggs in a manner that allows commingling, and has discouraged its use. We do not consider downstream pasteurization a solution to poor hygienic practices earlier in the chain. While we understand the need for flexibility in an international standard, we feel that there needs to be stronger emphasis of the more desirable approaches to sound egg processing. We believe the suggested wording is closer to our mutual goals.

**(iv) Shelf life for egg products**

**FIFTH BULLET****UNITED STATES OF AMERICA**

In the fifth bullet point under “Shelf life for egg products,” we recommend inserting the word “Processing” before “methods” to clarify what is meant by “methods.”

**5.2.3 Microbiological and Other Specifications****ICMSF**

Microbiological criteria are not recommended for shell eggs or for final processed egg-products for which the manufacturing process and/or the composition of the product are validated and controlled to eliminate significant hazards from the final product.

However, for processed egg products for which the degree of control is uncertain, for instance at port of entry, or for which there is insufficient knowledge about the control of the manufacturing operation or the product composition, the following microbiological criterion for *Salmonella* spp. is recommended:

Micro-organisms	Analytical reference methods	Sampling plan		Limit (per 25g)	
		n	c	m	M
<i>Salmonella</i> spp.	ISO6579	5	0	0*	n.a.

\*: interpretation: absence in each of the five 25g analytical sample units

n.a.: not applicable

For processed egg products, the following microbiological criterion is recommended as a suitable indicator of processing hygiene:

Micro-organisms	Analytical reference methods	Sampling plan		Limit (per g or ml)	
		n	c	m	M
<i>Enterobacteriaceae</i>	ISO21528	5	2	10	100

**8. TRANSPORTATION****FIRST PARAGRAPH****AUSTRALIA**

Replace “*foodstuffs*” with “*food*.”

**FIRST PRINCIPLE****JAPAN**

Similar to the comment for 3.3.3, Japan suggests addition to the principle to read: “Eggs and egg products should be transported in a manner that will minimize breakage, damage, microbial growth and contamination.”

**LAST PARAGRAPH****NEW ZEALAND**

New Zealand recommends that the last sentence of this section be amended to: “*Eggs should be maintained at an appropriate temperature, including avoiding fluctuations in temperatures that would result in condensation of water on the shell surface.*”

**9.1 Lot Identification****UNITED STATES OF AMERICA**

In the third explanatory note, the second sentence reads “Records should be kept for a period of time no shorter than the shelf life of the eggs and/or egg products.” The shelf life of some liquid egg products may only be 5 days. The U.S. is concerned that this is not an adequate period of time to conduct a traceback investigation, should that product cause, or be suspected of causing, a foodborne illness outbreak. We recommend this sentence be changed to read, “Records should be kept for a period of time sufficient to permit efficient traceback investigations of eggs and/or egg products.”