



<p>Proposal for Task Force Consideration at the ISSC 2015 Biennial Meeting</p>	<p><input type="checkbox"/> Growing Area</p> <p><input type="checkbox"/> Harvesting/Handling/Distribution</p> <p><input checked="" type="checkbox"/> Administrative</p>
<p>Submitter</p>	<p>Executive Office</p>
<p>Affiliation</p>	<p>Interstate Shellfish Sanitation Conference (ISSC)</p>
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<p>Proposal Subject</p>	<p>Critical Deficiencies</p>
<p>Specific NSSP Guide Reference</p>	<p>ISSC Constitution Bylaws & Procedures Procedure XV. Section 6. Subdivision vi.</p>
<p>Text of Proposal/ Requested Action</p>	<p>Subdivision vi. The following procedures will be implemented when an FDA evaluation identifies deficiencies with the above plant evaluation criteria</p> <p>Subdivision (a) The overall Plant Sanitation Program element will be assigned one of the following designations:</p> <p>(i) Conformance: The program is in compliance with all of the criteria listed above.</p> <p>(ii) Conformance with Deficiencies: The program is in compliance with Procedure XV. Section 6. Subdivision (b) Subdivision v. (a), (b), (c), (d), (e), and (f) and has 25% or less of plants with deficiencies associated with <u>critical</u>, key or other compliance items in {Procedure XV. Section 6. Subdivision (b) Subdivision (v) (g)}.</p> <p>(iii) Non-Conformance: The program is in compliance with Procedure XV. Section 6. Subdivision (b) Sub-division (v) (a), but, does not meet the criteria in Procedure XV. Section 6. Subdivision (b) Subdivision (v) Sub-division (b) or (c) or (d) or (e) or (f) has greater than 25% (but less than 51%) of plants with deficiencies associated with <u>critical</u>, key or other compliance items {Procedure XV. Section 6. Subdivision (b) Subdivision (v) (g)}.</p> <p>(iv) Major Non-Conformance: The program has multiple deficiencies. It is non-compliant with Procedure XV. Section 6. Subdivision (b) Subdivision (v) Subdivision (b) or (c) or (d) or (e) or (f) or 51% or greater of plants with deficiencies associated with Procedure XV <u>critical, key or other compliance items {Procedure XV, Section 6. Subdivision (b)</u></p>



	Subdivision (v) (g) <u>1</u> . FDA will follow the current compliance program for communication with the State agencies.
Public Health Significance	Presently Procedure XV. is unclear regarding how observed criticals identified during the in-plant evaluation will be used in assigning overall plant sanitation program designations. The in-field plant criteria in Section 6. Subdivision g. includes critical deficiencies; however, Subdivision vi. does not include any reference to critical deficiencies.
Cost Information	