

Proposal Subject:	Identification of Wet Stored Shellstock
Specific NSSP Guide Reference:	NSSP Guide Section II Model Ordinance Chapter X. General Requirements for Dealers @ .05 Shellstock Identification B. Tags (2)
Text of Proposal/ Requested Action	.05 B. (2) The dealers tag... <ul style="list-style-type: none"> (a) The dealer's name... (b) The dealer's certification... (c) The original shellstock ... (d) The date of harvest... (e) If depurated ... (f) The most precise... (g) <u>When the shellstock has been transported from the original area and wet stored in another approved growing area within the same state for at least two weeks, the dealer will:</u> <ul style="list-style-type: none"> <u>(i) use the date shellstock was harvested from the last growing area as the harvest date;</u> <u>(ii) identify the last growing area as the harvest location.</u> (g) <u>(h)</u> When the shellstock has been transported across state lines... (h) <u>(i)</u> The type and quantity ... (i) <u>(j)</u> The following statement... (j) <u>(k)</u> All shellstock intended...
Public Health Significance:	There is no guidance in the Model Ordinance on tagging shellstock that is moved from one growing area to another within the same state. After 2 weeks in a growing area, the shellstock would have the characteristics of the new growing area and the product should be tagged appropriately. This will facilitate product recall and trace backs in the event of human illnesses.
Cost Information (if available):	None
Action by 2003 Task Force II	Recommended referral of Proposal 03-204 to the appropriate committee as determined by the Conference Chairman.
Action by 2003 General Assembly	Adopted recommendation of 2003 Task Force II.
Action by USFDA	Concurred with Conference Action.
Action by 2005 Post Harvest Processing Committee	Recommended adoption of Proposal 03-204 with the following change to (g): <ul style="list-style-type: none"> <u>(i) use the date shellstock was harvested from the last most recent growing area as the harvest date;</u> <u>(ii) identify the last most recent growing area as the harvest location.</u>
Action by 2005 Task Force II	Recommended referral of Proposal 03-205 to appropriate committee as determined by the Conference Chairman.

Action by 2005 General Assembly	Adopted recommendation of 2005 Task Force II.
Action by USFDA	Concurred with Conference action.
Action by 2007 Traceability/PHP Committees	Recommended no action on Proposal 03-204. Rationale – No scientific information has been provided to support the suggestion that shellstock harvested and wet stored for a specified period of time in a site other than the original harvest site takes on the characteristics of the wet storage area.
Action by 2007 Task Force II	Recommended referral of Proposal 03-204 back to the Post Harvest Processing Committee with direction to address confusion over whether activity is wet storage, relay, or transplanting under aquaculture and to secure whatever science is available relative to length of time in growing area to take on new characteristics of that growing area.
Action by 2007 General Assembly	Adopted recommendation of 2007 Task Force II.
Action by USFDA	December 20, 2007 Concurred with Conference action.
Action by 2009 Post Harvesting Committee	Recommended no action on Proposal 03-204. Rationale: Two weeks is insufficient for shellfish to take on characteristics of new growing area. In addition, in 2007 changes were made to labeling of wet stored shellstock that addressed this and adoption of this proposal would be redundant. Further recommended that FDA investigate the similarities and differences between US and other countries' systems for labeling wet stored shellfish and request FDA evaluate whether the differences between the systems place US firms at a competitive disadvantage. Ask that FDA report back to the conference and include time lines for changes to approach.
Action by 2009 Task Force II	Recommended adoption of Post Harvest Processing Committee recommendation on Proposal 03-204.
Action by 2009 General Assembly	Adopted recommendation of 2009 Task Force II on Proposal 03-204.
Action by USFDA 02/16/2010	Concurred with Conference action on Proposal 03-204.