Proposal Subject: ISSC Constitutional Cost-Benefit Requirement for New Proposals that have a Significant

Financial Impact on the States and Shellfish Industry

Specific NSSP Guide Reference: Specific ISSC Constitution, By-Laws and Procedures Reference: Amendment to

Constitution Article XIII New Section 4.

Text of Proposal/ Requested Action Section 3. Proposals submitted by any Conference participants requiring Conference action are to be referred to the Executive Director for assignment to the appropriate Task Force.

<u>Section 4. Proposals submitted by any Conference participant that may have a significant cost to implement by either the SSCA or the Shellfish Industry must include an independent Cost-Benefit Analysis and an Economic Impact Study.</u>

Section -4 5. The Executive Director shall review and assign all problems or proposals received for Task Force and Conference deliberation. Problem or proposal assignment shall be made according to subject matter and in accordance with Article XIII. <u>Section 4.</u>, Section 5., Section 6., and Section 7. of the Constitution of the Conference.

Public Health Significance:

Cost-Benefit Analyses and Economic Impact Studies are required by Federal and State Agencies prior to imposing new regulations. For too many years the ISSC through amendments made to the NSSP without any regards to the costs imposed on the SSCA and Shellfish Industry to implement the new guidelines.

Cost Information (if available):

The cost to conduct Cost-Benefit Analyses and Economic Impact Studies will be much less on the SSCA'S and Shellfish Industry than the cost to implement by the SSCAs or the Shellfish Industry.

Action by 2009 Task Force III Recommended no action on Proposal 09-307.

Rationale: The Conference has previously discussed this concept and has chosen to request cost information only if available.

Action by 2009 General Assembly Adopted recommendation of 2009 Task Force III on Proposal 09-307.

Action by USFDA 02/16/2010

Concurred with Conference action on Proposal 09-307.