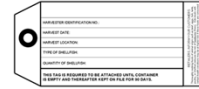


Submitter	Susan Ritchie New York State Department of Environmental Conservation susan.ritchie@dec.ny.gov
Proposal Subject	Removal of Harvester Tags being Shipped by Shellfish Dealers
Specific NSSP Guide Reference	Section II. Model Ordinance Chapter X. General Requirements for Dealers .05 Shellstock Identification
Text of Proposal/ Requested Action	<p>B. Tags</p> <ul style="list-style-type: none"> (1) The dealers' tags... (2) The dealer's tag... (3) When both the dealer and harvester tag appear on the container, the dealer's tag is not required to duplicate the information on the harvester's tag. <u>The harvester tag must be removed from each container prior to being shipped. The harvester tag shall be replaced with a dealer tag and shall meet the requirements in Section .05 B.</u> (4) If the shellstock... (5) Country of origin... (6) When shellstock intended... (7) If a shellfish...
Public Health Significance	<p>There should not be any harvester tags at restaurants because only harvesters who are also certified dealers can sell directly to retail or ship interstate making harvesters an unapproved source. When both tags are affixed to the container, there will also be a blank dealer's tag that may potentially be used by an unauthorized person. Excerpt from Shellfish Plant Sanitation Course. "Shellfish harvesters are authorized to: grow and harvest shellstock. Wash, sort, bag and tag harvested shellstock. Sell the product to certified dealers in the State, depending on the State's regulations. Only a harvester who is also a certified dealer can sell directly to retail or ship interstate."</p> <p>https://www.accessdata.fda.gov/ORAU/ShellfishPlantSanitation/SPS_01_000.htm</p>
Cost Information	\$0.00
Action by 2017 Task Force II	Recommended adoption of Proposal 17-217 as submitted.
Action by 2017 General Assembly	Adopted the recommendation of Task Force II on Proposal 17-217.

FDA Response to 2017 Summary of Actions

Proposal 17-217 Added language to Chapter X. which requires the removal of harvest tags from shellstock.



While FDA agrees with the intent of Proposal 17-217, FDA disagrees with the content of the language that was agreed upon by the ISSC. FDA believes that the language as adopted would cause changes in the program that aren't necessary to accomplish the intent of the proposal and believes that the intent can be accomplished in a more effective manner.

FDA requests the deletion of the language in Chapter X. .05 B. (3) as an interim measure.

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- Chapter X. @.05 B. (3) states that when both the harvester and dealer tag are on the container the dealer tag is not required to duplicate the information on the harvester tag.
- FDA' is suggesting that all required information be included on both tags.