

	Proposal for Task Force Consideration at the ISSC 2017 Biennial Meeting	<input type="checkbox"/> Growing Area <input checked="" type="checkbox"/> Harvesting/Handling/Distribution <input type="checkbox"/> Administrative
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Proposal Subject	Individual Shellfish Dealer with harvest vessels landing ocean quahogs (<i>Arctica islandia</i>) and surf clams (<i>Spisula solidissima</i>) from federal waters in another state.	
Specific NSSP Guide Reference	Section II. Model Ordinance Chapter I. Shellfish Sanitation Program Requirements for the Authority @.01 Administration., E. Administrative Procedures (2)	
Text of Proposal/ Requested Action	<p>E. Administrative Procedures.</p> <p>The Authority shall have administrative procedures sufficient to:</p> <ol style="list-style-type: none"> (1) Regulate shellfish harvesting, sale, or shipment; and (2) Ensure that all shellfish shipped in interstate commerce originate from a dealer located within the state from which the shellstock are harvested or landed, unless: <ol style="list-style-type: none"> <u>(a) The Authority has a memorandum of understanding with the Authority in another State to allow dealers from its state to purchase the shellstock, or</u> <u>(b) The shellfish are ocean quahogs (<i>Arctica islandia</i>) or surf clams (<i>Spisula solidissima</i>) intended for thermal processing, originating from the harvester and are being shipped directly to an out of state individual shellfish dealer listed on the FDA Interstate Certified Shellfish Shippers List.</u> (3) Detain, condemn, seize, and embargo shellfish. (4) Assure compliance with Shellfish Plant Inspection Standardization. 	
Public Health Significance	Ocean quahogs (<i>Arctica islandia</i>) or surf clams (<i>Spisula solidissima</i>) from Federal waters, intended for thermal processing, are landed in 32 bushel cages, weighing up to 3,500 pounds per cage, shipped in 50’ trailers, in truckloads of up to 40,000 pounds each. This shellfish is normally intended for processing immediately upon arrival at the shucking plant. In many cases when the harvest vessel lands the shellfish, the individual shellfish processor is waiting for the shipment to process it. Ocean quahogs and surf clams intended for thermal processing are offloaded directly to pre-chilled trailers for transportation. This transportation should be as direct as possible. To have truckloads of ocean quahogs or surf clams diverted from the harvester to a shellfish dealer located	

	<p>within the state of landing is an unnecessary burden on industry, it degrades the bacterial quality of the shellfish, and has in many cases become an unnecessary exercise and expense. All necessary NSSP records, traceability and monitoring will still occur and will be provided to the receiving dealer in the state where it will be shucked and processed.</p>
<p>Cost Information</p>	<p>Dealers within a state charge up to \$.25 per bushel for the paperwork to show the shellfish originating from their dealership so that ocean quahogs or surf clams can be shown to originate from a dealer in the state of landing. These dealers may have no other relationship to the harvester or processor but because the regulation requires origination from a dealer within the state this allows them to act as the middleman in a transaction that they should not be a party to. Regulators are forced to ensure truckloads are making a scheduled stop at a shellfish dealer located within the state so that the shellfish can ‘originate’ from a dealer within the state or spend the time issuing variances to counter this injustice. This proposed update to the Model Ordinance will streamline an unnecessarily burdensome requirement at a cost savings to both industry and regulators.</p>