

Proposal Subject: Post Harvest Handling

Specific NSSP Guide Reference: NSSP Guide Section II Model Ordinance Definitions and New Chapter XVII.

Text of Proposal/ Requested Action Action #1

Add a new definition to B. Definition of Terms for Post Harvest Handling and renumber Definitions Section accordingly.

Post Harvest Handling means a control(s) employed by a dealer to further reduce, beyond controls currently in place under the NSSP, the post harvest growth of naturally occurring pathogens for the purposes of handling product outside of as an alternative to the Authority's existing NSSP management plans.

Action #2:

Add a new chapter to the NSSP Guide Section II. Model Ordinance as follows:

Chapter XVII. Post Harvest Handling

A. If a dealer elects to use a post harvest handling control(s) to reduce the levels of post harvest growth of a naturally occurring pathogen(s) of public health concern in shellfish, the dealer shall:

(1) Have a HACCP plan (approved by the Authority) for the control(s) that reduces post harvest growth of the target pathogen(s).

(a) The dealer must validate that the post harvest handling control(s) reduces the post harvest growth of naturally occurring pathogen(s). The validation study must be approved by the State Shellfish Control Authority with FDA concurrence.

(b) The ability of the post harvest handling control(s) to reliably achieve the appropriate reduction in post harvest growth of the target pathogen(s) shall be routinely verified at a frequency determined by the State Shellfish Control Authority.

(2) Package and label all shellfish in accordance with the requirements of this Ordinance.

(3) Keep records in accordance with Chapter X. 07.

Public Health Significance: The changes recommended by this proposal provide added opportunities for shellfish dealers to meet the required State Control Plans for naturally occurring pathogens.

Cost Information (if available):

Action by 2009 Task Force II: Recommended referral of Proposal 09-231 to an appropriate committee as determined by the Conference Chairman.

Action by 2009 General Assembly Adopted recommendation of 2009 Task Force II on Proposal 09-231.

Action by USFDA 02/16/2010 Concurred with Conference action on Proposal 09-231.

- Action by 2011 Post Harvest Processing Committee** Recommended no action on Proposal 09-231.
Rationale: The proposed new definition and new chapter are not necessary because the State *Vibrio* Management Plans already allow handling practices to reduce levels of naturally occurring pathogens. The recommended changes are adequately addressed in the Model Ordinance.
- Action by 2011 Task Force II** Recommended referral of Proposal 09-231 to an appropriate Committee as determined by the Conference Chairman with instructions that the Committee establish validation protocols for activities that reduce levels of naturally occurring pathogens so that a dealer can work outside the Authority's *Vibrio* Management Plan. Additionally, the Committee is charged with ensuring the Post Harvest Handling (PHH) definition and section in Chapter XVII is consistent so that they are directing a process that reduces levels not just growth.

The intent of Task Force II is that Post Harvest Handling activities are not intended to be used to support labeling claims.
- Action by 2011 General Assembly** Adopted recommendation of 2011 Task Force II on Proposal 09-231.
- Action by FDA February 26, 2012** Concurred with Conference action on Proposal 09-231.