

Proposal Subject:	Shellfish Plant Inspection Documentation
Specific NSSP Guide Reference:	NSSP Section II Model Ordinance Chapter I Shellfish Sanitation Program Requirements for the Authority @ .02. Dealer Certification F. Inspections
Text of Proposal/ Requested Action	<p>Add new:</p> <ol style="list-style-type: none"> 3. <u>The Authority shall document deficiencies observed during the inspection. Documentation of observed deficiencies corrected during the inspection must remain on the inspection form as a complete and accurate documentation of corrections.</u> 4. <u>The Authority shall verify if observations made during a prior inspection are corrected. If an observation made during a prior inspection has not been corrected, or is a recurring observation, it must be documented on the inspection form.</u>
Public Health Significance:	<p>The unique nature of shellfish as a food consumed whole and raw in the form as it comes from the growing area requires the state shellfish control authority to have sufficient capacity to enforce the public health based restrictions on sanitation controls and to obtain meaningful penalties for violation of those controls. Dealer certification is intended to provide an unbroken chain of sanitation control to many shellfish from the moment of harvest to its sale at the wholesale or retail level. Dealers having major non-conformities with the NSSP Model Ordinance should not be certified. Certified dealers found to have major non-conformities should have their licenses, or permits suspended, or certifications revoked.</p> <p>Dealer certification is dependent on a dealer maintaining acceptable operational and sanitary conditions and is determined through uniform inspections by standardized inspectors. State officials who certify dealers must fully comply with the administrative requirements for certification for the process to remain viable. For the certification process to be effective, dealers must fully comply with the applicable Model Ordinance sanitation guidelines pertaining to the type of operation involved. Accurate documentation of observed deficiencies by the Authority is critical for maintaining and enforcing compliance with the sanitation controls in the <i>Guide for the Control of Molluscan Shellfish Model Ordinance</i>.</p>
Cost Information (if available):	N/A
Action by 2013 Task Force II	<p>Recommended no action on Proposal 13-201.</p> <p>Rationale: This proposal is adequately addressed in in the NSSP Guide Model Ordinance.</p>
Action by 2013 General Assembly	Adopted recommendation of 2013 Task Force II on Proposal 13-201.
Action by FDA May 5, 2014	Concurred with Conference action on Proposal 13-201.