

Proposal Subject:	Review of .03 Requirements for Dealers
Specific NSSP Guide Reference:	NSSP Guide Model Ordinance Chapters XI, XII, XIII, XIV, and XV Section .03
Text of Proposal/ Requested Action	Subsequent to the adoption of Federal Regulation 123 Fish and Fishery Products, the ISSC incorporated HACCP principles into the NSSP Model Ordinance. In this transition many items which were not associated with Critical Control Points or sanitation were incorporated into the .03 Sections of Chapters XI, XII, XIII, XIV, and XV. Many of these controls are not critical to ensuring that shellfish are safe for human consumption. While Section .03 does have a few important requirements, most are not essential to the effectiveness of the NSSP and should be eliminated. The submitter requests that a committee be appointed to determine which of the requirements presently included in the .03 Sections of Chapters XI, XII, XIII, and XIV should be retained and recommend an appropriate placement for incorporating these requirements into Section .01 and .02. The remaining requirements should then be deleted. The effort would make inspection, standardization, and evaluation of State programs more relevant to assuming that shellfish are safe for human consumption.
Public Health Significance:	The proposal would streamline inspection, standardization, and State evaluations. These changes would allow public health officials to focus on requirements that address illness risk.
Cost Information (if available):	
Action by 2013 Task Force II	Recommended adoption of Proposal 13-213 as submitted.
Action by 2013 General Assembly	Adopted recommendation of Task Force II on Proposal 13-213.
Action by FDA May 5, 2014	Concurred with Conference action on Proposal 13-213.