

**ISSC 2017  
Committee Report**

**Committee Name :** Traceability  
**Chairperson:** Bill Dewey  
**Date of Meeting:**  
**Recorder:**

**Approved By:** \_\_\_\_\_  
**Printed Name:**

**Committee Members Present:**

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|---|--|--|--|
| <input checked="" type="checkbox"/> Bill Dewey<br>(Chairperson) | <input checked="" type="checkbox"/> Lori Howell  | <input type="checkbox"/> Debbie Rouse              | <input checked="" type="checkbox"/> Brian Yarmosh  |
| <input type="checkbox"/> Erik Broussard                         | <input checked="" type="checkbox"/> Ian Jeffords | <input checked="" type="checkbox"/> Chris Shillaci | <input checked="" type="checkbox"/> Joel Hansel<br>(EPA Delegate)  |
| <input checked="" type="checkbox"/> Alissa Dragan               | <input type="checkbox"/> David Phinney           | <input type="checkbox"/> Danielle Schools          | <input checked="" type="checkbox"/> John Jaworski<br>(FDA Delegate)  |
| <input type="checkbox"/> John Fendl                             | <input type="checkbox"/> Risk Porso              | <input checked="" type="checkbox"/> Debra Scoville | <input checked="" type="checkbox"/> Cheryl Lassiter<br>(NOAA Delegate)<br>(Cheryl was not in attendance.<br>John Bell was the NOAA delegate) |
| <input type="checkbox"/> Alex hay                               | <input checked="" type="checkbox"/> Ruth Posadas | <input type="checkbox"/> Christopher Sherman       |  |
| <input type="checkbox"/> Robert Hein                            | <input checked="" type="checkbox"/> Bob Rheault  | <input checked="" type="checkbox"/> Wec Terry      |  |
| <input type="checkbox"/> Eric Hickey                            | <input type="checkbox"/> Miranda Ries            | <input checked="" type="checkbox"/> Carter Witten  |  |

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**Charges**

**Charge 1: Identify strategies for enhancing traceback capabilities of the NSSP. The discussion should include a review of new technologies.**

**Findings/Conclusions:**

The Committee was called to order at 8:50 am after rounding up enough people to establish a quorum.

Melissa Abbott from FDA provided an update on Conference for Food Protection Issue 2016-I-023.

Issue 2016-I-023 was submitted by ISSC to the CFP in 2016 in response to a 2015 Traceability Committee recommendation. The issue proposed to modify Section 3-203.12(A) of the 2013 FDA Food Code as indicated below from a Priority Foundation to a Priority Violation (language to be added is underlined; language to be deleted is in strikethrough format).

**3-203.12 Shellstock, Maintaining Identification.**

(A) Except as specified under Subparagraph (C) (2) of this section, SHELLSTOCK tags or labels shall remain attached to the container in which the SHELLSTOCK are received until the container is empty. ~~Pf P~~

The effect of this change was to increase the criticality of the violation for not keeping tags attached to containers until empty to improve traceability at retail.

In addition, the proposal included a second recommendation that directed the FDA to begin discussions with the ISSC and Conference for Food Protection to identify steps that can be taken to enhance implementation and enforcement of shellfish record keeping at retail establishments.

The issue was adopted by the CFP and concurred with by FDA. On further review by FDA's retail program it was determined that making 3-203.12 (A) a priority violation would be

inconsistent with the definition of priority violations and other tagging requirements. A request was made by FDA to the CFP not to implement part 1 of this issue and instead to make a concerted effort to implement recommendation #2. The Executive Director of the ISSC sent communication to the Executive Director of the Conference for Food Protection indicating an understanding of the concerns expressed by the FDA and supporting efforts to focus on accomplishing recommendation 2. The CFP Board responded that their preference was to implement both recommendations 1 and 2. FDA is further considering this response and has yet to make a final determination.

While no vote was taken the Chair asked if there was a recommendation from the committee regarding direction on implementation of recommendation #1. The sense he got from the response was agreement with FDA's recommendation not to implement it.

The committee discussed what was currently required by the food code regarding shellstock identification. Chris Shillaci provided copies to the committee of appropriate sections of the food code (appended to committee report).

Notably in addition to keeping the tags on file for 90 days, the food code requires them to be stored in chronological order in an approved record keeping system with dates marked on the tag for when the last product from the container is sold or served. Also if product is removed from the container the approved record keeping system must preserve the source identification. It was also noted that many states had the ability to seize and destroy shellfish that are not properly identified per section 3-202.18 (B).

There was considerable discussion regarding education of the retail sector as well as guidance and tools to make traceability easier and more effective. One tool mentioned was tear off sections on dealer tags to provide a record to keep on file and/or with product removed from the bag for display or serving. Massachusetts is developing an educational program for local boards for health for shellfish identification/traceability. Alex Munro from Taylor Shellfish in British Columbia reported he was serving on a committee that was developing guidance on shellfish identification/traceability for the retail sector in BC. Bob Rheault suggested an article could be written on shellfish identification guidance for Restaurant News.

In response to the Chair's request for new technologies committee members were aware of that might have merit for shellfish traceability, Ruth Posadas provided an article on a DNA spray on technology (<http://www.foodsafetynews.com/2014/11/dna-laced-spray-technology-could-revolutionize-food-traceability/#.WeOx6tMm42w>). The company's name has changed from DNATrek to Safetraces (<http://www.safetraces.com/>) since the article was published. Only half-jokingly the Chair suggested this product might be the answer to illness traceback from the oyster medley plate or multi source vibrio illnesses if the DNA labels could be identified in stool samples.

Also in response to the request for new technology, a representative from Vitsab noted they had recently incorporated a QR code onto their time temperature monitors to facilitate traceability.

### **Recommendations:**

ISSC organize a workshop to include representatives from FDA, ISSC, CFP, shellfish dealers, the wholesale, restaurant and retail sectors and point of sale software companies to identify steps that can be taken to enhance implementation and enforcement of shellfish record keeping at retail establishments (Motion by Jon Bell, 2<sup>nd</sup> by Joel Hansel, passed unanimously).