

 <p><b>Proposal for Task Force Consideration at the ISSC 2019 Biennial Meeting</b></p>	<p>1. a. <input checked="" type="checkbox"/> Growing Area          b. <input type="checkbox"/> Harvesting/Handling/Distribution          c. <input type="checkbox"/> Administrative</p>
2. Submitter	US Food & Drug Administration (FDA)
3. Affiliation	US Food & Drug Administration (FDA)
4. Address Line 1	5001 Campus Drive
5. Address Line 2	CPK1, HFS-325
6. City, State, Zip	College Park, MD 20740
7. Phone	240-402-1401
8. Fax	301-436-2601
9. Email	<a href="mailto:Melissa.Abbott@fda.hhs.gov">Melissa.Abbott@fda.hhs.gov</a>
10. Proposal Subject	Determining shoreline survey area.
11. Specific NSSP Guide Reference	Section II. Model Ordinance Chapter IV. Shellstock Growing Areas Section @.01 Sanitary Survey D.(1) and (2)(a).
12. Text of Proposal/ Requested Action	<p>(1) In the shoreline survey for each growing area, the Authority shall:  <u>(f) Conduct an in-field assessment of pollution sources which may include:</u>  <u>(i) A drive-through survey;</u>  <u>(ii) Observations made during sample collection; and/or</u>  <u>(iii) Information from other sources.</u></p> <p>(2) The Authority shall assure that the shoreline survey meets the following minimum requirements:          (a) The boundaries, <del>based on the area topography,</del> of each shoreline survey area are determined by an <del>in-field</del> investigation <del>which identifies only the properties with the potential to impact the shellfish waters that shall include, but not limited to, all properties with the potential to impact the shellstock growing area based on area topography, as well as field observations, and other sources of information;</del></p>
13. Public Health Significance	<p>The minimum requirements of the shoreline survey include an investigation and evaluation of pollution sources by trained, qualified, personnel. The investigation must be accomplished through an in-field assessment where the surveyor identifies actual and potential sources of pollution that might influence water quality.</p> <p>Given the technology available today, there are multiple options for identifying properties with the potential to impact growing areas. The Authority can define the shoreline survey area boundary by using various data resources such as geoprapphic information such as on-line maps.</p> <p>Using the term “only” as it is used in the existing language is confusing and, if taken literally, limiting.</p> <p>Example: One property two miles from the growing contains a large wastewater treatment plant that has the potential to impact shellfish waters. Another property one- and one-half miles from the growing area between that growing area and the property with the wastewater treatment plant on it has no identifiable pollution sources on it so that it does not have potential to impact shellfish waters. If the shoreline survey area is defined as a single area that includes the property with the</p>

	wastewater treatment plant, it will also include the property with no identifiable pollution sources on it. Thus, it will not be an area that has “only” the properties with potential to impact the shellfish waters in it.
14. Cost Information	No cost.