

 <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)
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10. Proposal Subject	Authorizing unclassified areas and multiple classifications for single area.
11. Specific NSSP Guide Reference	Section II. Model Ordinance Chapter IV. Shellstock Growing Areas Section @.03 Growing Area Classification A.(2).
12. Text of Proposal/ Requested Action	<p>(2) Classification of <del>All</del> Growing Areas. <del>All</del> <del>Each</del> growing <del>areas</del> <del>area</del> which:</p> <p>(a) <del>Are-Is</del> not subjected to a sanitary survey every twelve (12) years shall be classified as prohibited <del>or, if unclassified, shall be treated as prohibited for NSSP purposes; or</del></p> <p><del>(b) Have a sewage treatment plant outfall or other point source outfall of public health significance within or adjacent to the growing area shall have an area in the prohibited classification established adjacent to the outfall in accordance with Section E. Prohibited Classification; and</del></p> <p><del>(b)</del> <del>Are-Is</del> subjected to a sanitary survey shall be correctly classified based on the twelve (12) year sanitary survey, and its most recent triennial or annual reevaluation when available, as <del>only one</del> <del>or more</del> <del>(1)</del> of the following:</p> <ul style="list-style-type: none"> <li>(i) Approved;</li> <li>(ii) Conditionally Approved;</li> <li>(iii) Restricted;</li> <li>(iv) Conditionally Restricted; <del>and</del> <del>or</del></li> <li>(v) Prohibited.</li> </ul>
13. Public Health Significance	<p>There is no reason to require that all growing areas be classified if the Authority is required to treat unclassified areas as prohibited areas.</p> <p>The current Section II. Chapter IV. @.03A.(2)(b) language is unnecessary.</p> <p>Requiring that each growing area be characterized by only one classification is not realistic and does not reflect common practice. There are many circumstances in which one growing area contains several classifications.</p> <p>Example: A 10 square mile growing area is generally classified as approved. However, there is a marina in it, so some waters associated with that marina are classified as prohibited and restricted. There is a business with a 5,000 gallon per day wastewater treatment system discharging along the shoreline so there is a prohibited zone adjacent to that point source. That circumstance literally represents violation of Chapter IV. @.03A.(2)(c) as that requirement now reads because there are multiple classifications within a single growing area.</p>

14. Cost Information	No cost.