

**ISSC 2013 Biennial Meeting
January 25 – January 31, 2014 – San Antonio, Texas
Committee Report**

Committee Name : Traceability

Chairperson: Bill Dewey

Date of Meeting: 1/26/14

Recorder: Bob Rheault

Approved By: Bill Dewey

Committee Members Present:

Bill Dewey	Jon Bell	Austin Doctor
Alissa Dragan	Steve Fleetwood	Mike Hickey
Lori Howell	Joseph Murphy	Chris Nelson
Rick Porso	Bob Rheault	Cheryl Lassitter
Debra Scoville	Kirk Wiles	Gary Wolf
Joel Hansel	Michael Antee	

Committee Members Absent:

Bruce Chamberlain	Paul Distefano
Greg Pallaske	David Wiggins

Charges

Charge 1: Initiate discussions to assess the effectiveness of the present traceback requirements of the NSSP Model Ordinance. The discussion should include a review of new technologies and a revisit of earlier discussions regarding a traceability field study.

Findings:

The committee reviewed Executive Board action on the four recommendations from the 10/2/11 Seattle meeting.

The committee continued discussions on traceability technologies. Trace Register was supposed to present an update to the committee on the shellfish pilot being conducted in the Gulf however they were not present to do so. It was noted that Trace Register presented an update on the Gulf pilot on 5/30/13 via webinar to the Committee. Jon Bell who has served as an advisor to the project which has been completed provided some observations on the technology as did Lori Howell who uses it currently for two existing customers who require it.

While the vision of the Trace Register cloud based tracking system for shellfish from bed to plate is laudible the pilot and early experience suggest there are some significant hurdles to getting it implemented. These hurdles include cost, getting harvesters to embrace using the technology on the water and retailers in their facilities. For vertically integrated companies it may be more practical particularly with the marketing incentive of enhancing the consumer experience and brand loyalty.

Trace Register will be at the conference later in the week and may be able to address these concerns.

Trace Register is working on a pilot with Washington State Department of Health, Department of Natural Resources and the Department of Fish & Wildlife to implement a pilot for tracing wild harvest of geoduck.

The Nisqually Tribe in Washington is piloting a fish tickets with QR codes to improve traceability.

The 1/14/14 Yahoo Food article Oyster Fraud: The Restaurant Industry's Dirty Little Secret <https://www.yahoo.com/food/oyster-fraud-the-restaurant-industrys-dirty-little-72450900944.html> was called to the committee's attention by the Chair along with a call he had had from DSSSecure about their Authentiguard product. This technology appears to couple a QR code with a secure unforgeable symbol to ensure authenticity of the tag.

The Chair informed the committee of an August 2012 paper by NOAA intern Daniel Hosmer titled "Developing a Regulatory Regime for Aquaculture Products". While this report focused on the challenges of distinguishing wild harvest product from aquaculture product products, it includes information of potential interest to committee members.

The Chair also discussed and shared photos of the Traceable Oyster Production System (TOPS) oyster under development in NZ (patent pending) With this system single oyster seed are glued to a tag that remains on the oyster umbo through harvesting and marketing .

Gary Wolfe informed the committee of a recent FDA course to train the trainer on Traceback investigation noting the potential to redesign it specifically for shellfish.

Page 4 of the Cholera and Other Vibrio Illness Surveillance System (COVIS) illness report form was discussed. Concerns were expressed regarding it not being intuitive to fill out and that it often is not used accordingly. While limited to Vibrio illnesses it could help facilitate traceback if completed properly. It was noted that there has been a supplemental form provided to the states to gather more information about Vibrio illnesses but it is not being used.

There was discussion regarding collaborating with SERVSAFE to get restaurants to do a better job on refrigeration and tag retention.

Lori Howell noted that the Vv illness review committee has found good traceback for Gulf product. Improving traceback on the east coast. Lori noted it was their observation that the system most often fails in the inland states where they are less familiar with shellfish and the shellfish specific Food Code requirements.

Discussion of the illness review committee findings coupled with Mark Glatzer's observations from reviewing years of V. v. illness traceback data lead to the finding that there are traceback breakdowns at the retail level when tags are not stored chronologically or marked with the date the container was emptied (Food Code requirement).

Conclusions:

Traceability technology continues to evolve and this committee needs to continue to review its application to shellfish.

The Executive Board acted on 3 of the four 10/2/11 Committee recommendations, including asking IFT to include shellfish as one of their traceback study pilots and requesting FDA to provide funding to IFT to include a shellfish pilot if they weren't able to do it within their existing funding. While not known why, IFT did not include a shellfish pilot. The third recommendation resulted in a joint ISSC/Conference for Food Protection letter going out to state agencies responsible for implementing the model food code reminding them of the raw molluscan shellfish requirements in the Food Code.

The 4th recommendation to move ahead on conducting the traceback/trace forward studies was not acted on. The Committee felt at this point, lacking these studies that there was enough information from illness investigations and tracebacks to conclude lack of chronological storing of tags by retailers and not marking date empty on the tags contributed significantly to inaccurate traceback and/or overly broad recalls. It was also stated that tagging enforcement is lacking and is necessary to deter abuse. Improved enforcement on tags would improve traceability.

The COVIS form page 4 needs review and editing to make it more intuitive and instructive to complete.

FDA's new train the trainer program offers an opportunity to train personnel on shellfish traceback.

Recommendations:

1) It was moved by Lori Howell and seconded by Mike Hickey to request that the ISSC Executive Board ask the FDA incorporate shellfish traceback in their Train the Trainer course and also ask FDA and ISSC to develop a stand alone course.and request ISSC Executive Board ask FDA to mandate local inspectors get training on shellfish traceback and make it available for continuing education units - Motion adopted

2) It was moved by Steve Fleetwood and seconded by Mike Hickey to request that a committee be formed and charged to look at the COVIS investigation form to improve traceback - Motion adopted

3) It was moved by Mike Hickey and seconded by Chris Nelson to request that the Executive Board ask the Conference for Food Protection to emphasize annually the importance of retaining the tags in an orderly and chronological fashion, noting the dates of consumption, while prefacing this with our appreciation of their efforts on our behalf to date. - Motion adopted

Additional Information: