

Proposal Subject	Modification of Plant Inspection Checklist
Specific NSSP Guide Reference	Guidance Documents, Chapter III. Harvesting, Handling, Processing, Distribution, Section 02. Shellfish Plant Inspection Standardization Procedures, NSSP Standardized Shellfish Processing Plant Inspection Form, Page 400.
Text of Proposal/ Requested Action	Modify the NSSP Standardized Shellfish Processing Plant Inspection Form by removing the Overall Code boxes in the HACCP Plan Elements and HACCP Plan Implementation sections of the Standardized Shellfish Processing Plant Inspection Form (attached).
Public Health Significance	Action by the 2000 ISSC approving certification requirements Chapter <u>I.@.02.B.</u> eliminates the need for using the Overall Code Boxes. FDA is submitting this issue to remove these Overall Code boxes.
Cost Information (if available)	N/A
Action by 2005 Task Force III	Recommended referral of Proposal 05-307, and documents submitted by SSSOG (attached) to an appropriate committee as determined by the Conference Chairperson.
Action by 2005 General Assembly	Adopted recommendation of 2005 Task Force III.
Action by USFDA	Concurred with Conference action.
Action by 2007 Plant Standardization Advisory Committee	Recommended adoption of Proposal 05-307 with the following amendments: <ol style="list-style-type: none"> 1. Eliminate the overall code box to the right 2. Revise the boxes on the form as shown below with the exception of the top item "Corrective Actions recorded" in the upper right hand box. 3. Revise the Corrective Actions recorded item to no longer be a critical violation but rather a key (K). Include the (K) next to the item on the inspection form.
Action by 2007 Task Force III	Recommended adoption of the Plant Standardization Advisory Committee recommendation on Proposal 05-307.
Action by 2007 General Assembly	Adopted recommendation of 2007 Task Force III.
Action by USFDA	December 20, 2007 Concurred with Conference action.

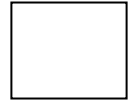
NSSP Standardized Shellfish Processing Plant Inspection Form

Agency Name:							Date					
Type of Inspection		<input type="checkbox"/> Certification <input type="checkbox"/> Pre-operational <input type="checkbox"/> Routine <input type="checkbox"/> Follow-up <input type="checkbox"/> Standardization										
Dealer Name:				Certification Number								
Dealer Address:												
Hazard Analysis Critical Control Point (HACCP)												
1.	HACCP Plan		Yes	No	Required for Certification							
2.	Plan Elements Identified and Adequate		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Code			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Code		
	(a) Hazards				O	(e) Critical Control Points				K		
	(b) Records				O	(f) Monitoring				K		
	(c) Critical Limits				K	(g) Verification Procedures				O		
	(d) Name, Address, Signed and Dated				O	(h) Corrective Action if identified				K		
3.	HACCP Training		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	Code		O			
4.	Plan Implementation				Corrective Actions (C)		Verification Procedures (K)		Monitoring Procedures (K)		Records Accurate/Maintained (K) Records Format Signed/Dated Firm's Name (O)	
			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Code	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Code	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Code	Code
	(a)	Receiving										
	(b)	Shellstock Storage										
	(c)	Processing										
	(d)	Shucked Meat Storage										
	(e)	Other Critical Limits										
5.	Approved Source Control Failure										C	
6.	Time/Temperature Control Failure										C	
7.	Other Critical Control Failure										C	
Sanitation Items								Citation		<input checked="" type="checkbox"/>	Code	
8.	Safety of water for processing and ice production							.02A				
9.	Condition and cleanliness of food contact surfaces							.02B				
10.	Prevention of cross-contamination							.02C				
11.	Maintenance of hand-washing, hand sanitizing, and toilet facilities							.02D				
12.	Protection from adulterants							.02E				
13.	Proper labeling, storage, and use of toxic compounds							.02F				
14.	Control of employees with adverse health conditions							.02G				
15.	Exclusion of pests							.02H				
16.	Sanitation Monitoring and Records										K	
Additional Model Ordinance Requirements								Citation		<input checked="" type="checkbox"/>	Code	
17.	Plants and Grounds							.03A				
18.	Plumbing and related facilities							.03B				
19.	Utilities							.03C				
20.	Insects and vermin control							.03D				
21.	Disposal of other waste							.03E				
22.	Equipment construction (non-food contact surfaces)							.03F				
23.	Cleaning non-food contact surfaces							.03G				
24.	Shellfish storage and handling							.03H				
25.	Heat shock							.03I				
26.	Personnel							.03J				
27.	Supervision							.03K				
28.	Transportation (To include only the person shipping)							IX.05			K	
29.	Labeling and Tagging (Other than receiving)							X.05, .06			S (K/O)	
30.	Shipping Documents and Records							X.07			K	
Dealer's Signature							Inspector's Signature					

SSSOG Attachment

Simplify Item #4 on the NSSP Standardized Shellfish Processing Plant Inspection Form to read as follows:

4.	Plan Implementation		Corrective Actions recorded Verification Procedures Monitoring Procedures Records Accurate/Maintained Records Format Signed/Dated Firm Name on Plan S (K, O)	
			✓/✗	Code
	(a)	Receiving		
	(b)	Shellstock Storage		
	(c)	Processing		
	(d)	Shucked Meat Storage		
(e)	Other Critical Limits			



The specific deficiencies listed on Item #4 of the existing NSSP inspection form are already detailed by the inspector on the NSSP narrative inspection form when reviewing the firm’s HACCP records. Trying to determine where to debit deficiencies under #4 is often confusing, takes additional time and serves little purpose. The proposed change would group all categories on the existing form into one and would designate a Swing (Key or Other) for deficiencies noted.

This proposed change would also remove the “Critical” deficiency listed for records of Corrective Actions. Under the NSSP Model Ordinance, Chapter I., §.02 H (2) (Actions Triggered by Inspections), critical deficiencies must be corrected during that inspection or the dealer must cease production affected by the deficiency. Corrective Action *record keeping* deficiencies in #4 however may be weeks or months old when discovered by an inspector and