

**Proposal Subject:** Tagging Requirements for Wet Stored Shellstock

**Specific NSSP Guide Reference:** NSSP Guide Section II Model Ordinance Chapter X. General Requirements .05 B. (2) (d)

NSSP Guide Section IV. Guidance Documents Chapter III. Harvesting, Handling, Processing, and Distribution

**Text of Proposal/ Requested Action** Section II. Model Ordinance Chapter X. General Requirements B. Tags.

- (2) The dealer's tag shall contain the following indelible, legible information in the order specified below:
- (a) The dealer's name and address.
  - (b) The dealer's certification number as assigned by the Authority.
  - (c) The original shellstock shipper's certification number. If depurated the original shellstock shipper's certification number is not required.
  - (d) The harvest date; or if depurated, the date of depuration processing, or if wet stored, the original harvest date, the dealers lot designation, the letter "W" and the final harvest date which is the date removed from wet storage.

Section IV. Guidance Documents Chapter III. Harvesting, Handling, Processing, and Distribution

.04 Shellstock Tagging.

Except for shellstock that originated from a depuration-processor, shellstock transported across State lines and placed in wet storage must include the following information on its shipping tag after removal from wet storage:

- All information required on a dealer's tag as specified above; and
- The statement that "THIS PRODUCT IS A PRODUCT OF (NAME OF STATE) AND WAS WET STORED AT (FACILITY CERTIFICATION NUMBER) FROM (DATE) TO AND WAS REMOVED FROM WET STORAGE ON (DATE)"

**Public Health Significance:**

Having multiple dates on the dealer's tag has proven to be confusing to the customers. The CFIA has chosen to avoid this confusion by listing date of removal from wet storage and listing that as the harvest date. This is the most efficacious method of clarifying the issue of when the shellfish comes out of the water which determines the shelf life of the product.

Trace back is still dependent upon the Dealer's inventory control and the ability of the wet storage operator to distinguish which lots of shellfish came from which harvest area on certain dates and which lots went to which customers on which ship dates. This information trail is still vital to the trace back and will still be required.

This will make Canadian CFIA wet storage tagging requirements consistent with those of the ISSC and maintain true equivalence between the two programs. This is important since products from both countries compete directly in the marketplace.

**Cost Information (if available):**

Trace back will still be dependent on the wet storage operator's ability to maintain accurate inventory records demarcating which lots from which harvest areas and dates were shipped to which customers on which dates. Requiring this information on the

tags as well only adds a layer of complexity and confuses the customers.

**Action by 2013  
Task Force II**

Recommended referral of Proposal 13-212 to an appropriate Committee as determined by the Conference Chairman with instructions to the Committee to try and find ways to increase foreign compliance on this issue.

**Action by 2013  
General Assembly**

Adopted recommendation of Task Force II on Proposal 13-212.

**Action by FDA  
May 5, 2014**

Concurred with Conference action on Proposal 13-212.