Proposal Number: 05-207

**Proposal Subject** 

Shellstock Tag Dimensions

Specific NSSP Guide Reference: NSSP Guide Model Ordinance Chapter X. General Requirements for Dealers .05 Shellstock Identification. (B) Tags (1) (b) and VIII. Control of Shellfish Harvesting .02 Shellstock Harvesting and Handling (E) shellstock identification (4)(b)

Text of Proposal/ Requested Action Amend Model Ordinance Chapter X. General Requirements for Dealers .05 Shellstock Identification. (B)(1)(b) as follows:

(b) Be at least  $\frac{2.5}{8}$  inches by  $\frac{5.1}{4}$   $\frac{13.8 \text{ square}}{13.8 \text{ square}}$  inches  $(\frac{6.7 \times 13.3}{89.03} \text{ cm}^2)$  in size.

Amend Model Ordinance Chapter VIII. Control of Shellfish Harvesting .02 Shellstock Harvesting and Handling (E)(4)(b) as follows:

(b) Be at least  $\frac{2.5}{8}$  inches by  $\frac{5.1}{4}$   $\frac{13.8 \text{ square}}{13.8 \text{ square}}$  inches  $(\frac{6.7 \times 13.3}{6.7 \times 13.3} \times 13.3 \times 13$ 

Public Health Significance:

The main public health reason for minimum size requirements for tags is to ensure adequate room for all of the required information in a font that is legible.

The number of square inches is critical however the specific dimensions to achieve the minimum square inches should not be. It provides no additional public health benefit. Taylor Shellfish Company prints tags in house with a thermal transfer printer which uses a label stock that exceeds the square inches of the 2 5/8" by 5 1/4" specified in the MO but has been found out of compliance since they are not the specific dimensions.

While we feel the current language which begins "Be at least..." allows for a larger tag of varying dimensions, this issue is apparently necessary of additional clarification.

Cost Information (if available):

If passed, this proposal would not cost anyone anything. It could provide a cost savings to certified dealers shopping for label printers since they would have a greater selection of manufacturers to choose from.

Action by 2005 Task Force II Recommended adoption of Proposal 05-207 as submitted.

Action by 2005 General Assembly Adopted recommendation of 2005 Task Force II.

**Action by USFDA** Concurred with Conference action.