Proposal Number: 05-225

Proposal Subject

Plant Sanitation

Specific NSSP Guide Reference Model Ordinance Chapters XI., XII., XIII., XIV., and XV. Sections .03 Other Model Ordinance Requirements

Text of Proposal/ Requested Action

Eliminate specific references to deficiencies found in the sections entitled "Other Model Ordinance Requirements" already covered in other sections of the 2003 NSSP Guide for the Control of Molluscan Shellfish.

The following references need to be deleted from Model Ordinance Chapters XI., XII., XIII., XIV., and XV. Of the 2003 NSSP Guide:

.03 A. (6) (c) and (d) Covered in .02 C. Sanitation Requirements (SSOP)

.03 A. (7) Covered in .02 H. Pest Control Program

.03 B. (1) and (2) Covered in .02 D. SSOP

.03 B. (4) Covered in .02 A. Sanitation Requirements (SSOP)

.03 D. and E. Covered in .02 H. Pest Control

.03 F. and G. Not a food safety issue and covered in SSOP

.03 J. Plant Sanitation Program

Public Health Significance All of these deficiencies are covered through the HACCP and sanitation requirements already in place as well as in other sections of the 2003 NSSP Guide.

In addition, elimination of these deficiencies will help the State Health Authorities to better focus on the Critical Control Points and Sanitation requirements of the NSSP Model Ordinance.

Eliminating the above mentioned deficiencies contained in the sections entitled "Other Model Ordinance Requirements" located in sections entitled "Requirements for Dealers" of the 2003 NSSP Guide will not lessen public health protection.

Cost Information (if available)

Significant cost savings could be realized by states not spending the time and effort to: (1) cite deficiencies; (2) to establish corrective action schedules; and (3) to follow up on deficiencies already covered through HACCP and sanitation requirements already in place and other sections of the 2003 NSSP Guide. Similar cost savings could be also realized by industry.

Action by 2005 Task Force II Recommended referral of Proposal 05-225 to appropriate Committee as determined by the Conference Chairman, with a recommendation that a workgroup be established to address this proposal in advance of the 2007 Biennial Meeting.

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

Action by USFDA

Concurred with Conference action.