

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.
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.

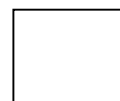
NSSP Standardized Shellfish Processing Plant Inspection Form

Agency Name:						Date		
Type of Inspection		<input type="radio"/> Certification <input type="radio"/> Pre-operational <input type="radio"/> Routine <input type="radio"/> Follow-up <input type="radio"/> Standardization						
Dealer Name:						Certification Number		
Dealer Address:								
Hazard Analysis Critical Control Point (HACCP)								
1.	HACCP Plan Yes <input type="radio"/> No <input type="radio"/> Required for Certification							
2.	Plan Elements Identified and Adequate		<input checked="" type="checkbox"/> / <input checked="" type="checkbox"/> NA	Code			<input checked="" type="checkbox"/> / <input checked="" type="checkbox"/> NA	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="radio"/> Yes <input type="radio"/> No		Code		O	
4.	Plan Implementation		Corrective Actions (C) <input checked="" type="checkbox"/> / <input checked="" type="checkbox"/> Code		Verification Procedures (K) <input checked="" type="checkbox"/> / <input checked="" type="checkbox"/> Code		Monitoring Procedures (K) <input checked="" type="checkbox"/> / <input checked="" type="checkbox"/> Code	
							Records Accurate/Maintained (K) Records Format Signed/Dated Firm's Name (O)	
	(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"/> / <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"/> / <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 weeks or months old when discovered by an inspector and usually the deviation that caused a corrective action to be taken cannot rectified.