

ISSC 2009 Biennial Meeting
October 17-23, 2009 – Manchester, New Hampshire
Committee Report

Committee Name :	Chemical Contamination Committee	
Chairperson:	Bob Connell	
Date of Meeting:	October 18, 2009	
Roster:	<div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Bob Connell <input checked="" type="checkbox"/> Kathy Brohawn <input type="checkbox"/> Anthony Roussell <input checked="" type="checkbox"/> Tom Howell <input checked="" type="checkbox"/> John Veazey <input checked="" type="checkbox"/> Calvin Walker </div> <div> <input checked="" type="checkbox"/> Patti Fowler (Alternate Shannon Jenkins) <input checked="" type="checkbox"/> Bill Hastback <input checked="" type="checkbox"/> Bob Woolrich <input type="checkbox"/> Bill Dewey <input checked="" type="checkbox"/> Joel Hansel (Alternate Bill Kramer) </div> </div>	
Charge 1:	Proposal 07-107: Deletions and Additions to Table 1 Action Levels, Tolerances and Guidance Levels for Poisonous or Deleterious Substances in Seafood.	
Findings:	The FDA proposal to delete arsenic, cadmium, chromium, lead, and nickel from Table 1 - Action Levels, Tolerances and Guidance Levels for Poisonous and Deleterious Substances in NSSP Guidance Documents Chapter II.04 is based on the fact that much of the science behind the assumptions in these documents is out of date. Also, levels in Table were derived from examples and were not intended to be used as fixed levels. FDA's intention was for the entire Guidance Document to be used as a process to derive a level of concern on a case-by-case basis.	
Conclusions:	The current guidance levels for these heavy metals are not adequately supported by the current science. The Guidance Documents for heavy metals are useful and need to be updated with instruction on their use clarified.	
Recommendations:	The guidance levels for the heavy metals listed above should be removed from Table 1 as proposed by FDA. The Conference should recommend that FDA work to expeditiously update the heavy metals guidance documents based on current science and set standards for national and international commerce.	
Findings:	Other countries may have standards for heavy metals in shellfish. For example, the World Health Organization and the Food and Agriculture Organization have developed criteria for cadmium in Molluscan shellfish under the Codex Alimentarius Commission.	
Conclusions:	We should consider consistency issues with foreign countries as we make changes to how we address heavy metals.	
Recommendations:	The Conference should reach out to FDA's National Shellfish Team for information on standards on heavy metals used by foreign countries to help assure consistency in our approach.	
Findings:	The chemical contaminants listed for addition to Table 1 in Proposal 07-107 are in FDA's Fish and Fisheries Products & Controls Guidance. Some, if not all, of these substances have the potential to be present in Molluscan shellfish.	
Conclusions:	For consistency with the FDA's Fish and Fisheries Products & Controls Guidance, these substances should be added to the Guide for the Control	

	of Molluscan Shellfish.
Recommendations:	The chemical contaminants listed for addition in the FDA proposal should be added to Table 1 Action Levels, Tolerances and Guidance Levels for Poisonous or Deleterious Substances in Seafood.
Findings:	The less than symbol in front of 20 MU/100 g for Neurotoxic Shellfish Poisoning (NSP) in Table 1 - Action Levels, Tolerances and Guidance Levels for Poisonous and Deleterious Substances in NSSP Guidance Documents Chapter II.-04 is inconsistent with the Marine Biotoxin Control section of the Model Ordinance.
Conclusions:	The less than symbol should be removed from in front of 20 MU/100 g for Neurotoxic Shellfish Poisoning (NSP) in Table 1.
Recommendations:	The less than symbol should be removed from in front of 20 MU/100 g for Neurotoxic Shellfish Poisoning (NSP) in Table 1 as proposed by FDA in 07-107.
Additional Information:	The Committee discussed the need for a guidance level for dioxin, but felt that further information on the occurrence of this contaminant in molluscan shellfish should be gathered by the committee members for consideration prior to making a recommendation.
Recorder:	Bob Connell
Approved by:	Bob Connell