Proposal Subject: Rapid Extraction Method for PSP and ASP

Specific NSSP Guide Reference: Section II. Model Ordinance Chapter III Laboratory @.02 Methods
ISSC Constitution, ByLaws, and Procedures
Procedure XVI, Procedure for Acceptance and Approval of Analytical Methods for the NSSP.

Text of Proposal/ Requested Action

Marine biotoxins affect farmed and wild fish and shellfish, as well as having a deleterious effect on humans. Jellett Rapid Testing has designed and developed rugged tests for the presence of Paralytic Shellfish Poison, Amnesic Shellfish Poison and Diarrhetic Shellfish Poison (under development at the time of this submittal). To facilitate the use of these tests in the field (for aquaculturists, campers, regulatory officials, etc.), Jellett Rapid Testing has developed a "low-tech" rugged alternative to the standard AOAC method designed to extract the toxins in the field as well as the laboratory. The AOAC method requires the sample to be boiled in acid at low pH and the pH adjusted with strong acids. This requires a fully equipped laboratory and significant safety precautions. The JRT Rapid Extraction Method was designed for use in remote areas, with little sophisticated backup support, by average individuals with little training and education. It is faster, less labor-intensive and less expensive than the other available method.

The rapid extraction method requires vinegar and rubbing alcohol to extract the toxins. A simple, rapid, safe method such as this would make rapid tests for marine biotoxins available in remote areas, to fishermen, aquaculturists, and regulatory officials on an instant basis.

The method developed by Jellett Rapid Testing Ltd has been presented to regulatory bodies over the past several years. In cooperation with individuals, governments and those organizations, the analytical method has been refined and improved. The Rapid Extraction Method is being tested in several states and foreign countries. Publications will be forthcoming.

The CONSTITUTION BY-LAWS and PROCEDURES of the INTERSTATE SHELLFISH SANITATION CONFERENCE allows the ISSC, through the Laboratory Methods Review Committee, to accept analytical methods that are sufficiently validated but are not AOAC or APHA methods. This is defined in the Constitution, PROCEDURE XVI. PROCEDURE FOR ACCEPTANCE AND APPROVAL OF ANALYTICAL METHODS FOR THE NSSP. Two possible reasons for considering a method are found in Subdivisions i and ii.

Subdivision i. Meets immediate or continuing need;
Subdivision ii. Improves analytical capability under the NSSP as an alternative to other approved or accepted method(s)

Currently, only the AOAC extraction for PSP and ASP are accepted. The need for a simple safe extraction method has been expressed by regulatory agencies, governmental organizations and industry for many years. The Jellett Rapid Extraction Method is being validated over a wide geographic area to demonstrate its simplicity, reliability, precision and accuracy. As a result of demonstrations of efficacy and the need that has been expressed by industry and state agencies, the Jellett Rapid Extraction Method is presented as an alternative extraction method for PSP and ASP for the NSSP as a Type III or Type IV method.

Please see attached additional information.

Suggested wording:
Section II, Chapter III Laboratory @.02 Methods

C. Biotoxin. Methods for the analyses of shellfish and shellfish harvest waters shall be:

(1) The current AOAC and APHA methods used in bioassay for paralytic shellfish poisoning toxins; and

(2) The current APHA method used in bioassay for *Karemia breve* toxins.

(3) The Jellett Rapid Extraction Method may be used for extracting PSP and ASP toxins from Shellfish by regulatory and industry laboratories.

Public Health Significance:

Currently, only the AOAC extraction for PSP and ASP analyses are accepted. Because of many significant constraints, in practical terms, this means that analyses can be conducted only in laboratories, and then under dangerous conditions. Acceptance of the Jellett Rapid Extraction Method for PSP and ASP would allow harvesters, processors, and regulatory agencies to screen for PSP and ASP with an accepted standardized method that provides valid useable data.

The Jellett Rapid Extraction Method for PSP and ASP was developed over several years in answer to the oft-stated need for a rapid, reliable, rugged, simple and safe sample preparation method. The Jellett Rapid Extraction Method for PSP and ASP is not meant to be a definitive "Standard Method", but rather to provide a supplementary extraction method that can be used in the field as well as in the lab.

Possible applications for The Jellett Rapid Extraction Method for PSP and ASP include:

- as a supplement to analytical methods of screening out negative samples in shellfish regulatory labs;
- as a harvest management tool at aquaculture facilities or in wild shellfish harvest areas (especially near shore areas) to supplement available methods to determine if shellfish are free of PSP or ASP and safe to harvest;
- as a supplement to quality control methods for shellfish processing plants, distributors and wholesalers to ensure incoming shellfish are free of PSP and ASP toxins before processing or further distribution (this test could become part of the plant's HACCP program);
- as a supplement to analytical methods for water classification for biotoxins; and
- as a supplement to analytical methods for broad scale ecological monitoring.

The rationale for using the Jellett Rapid Extraction Method for PSP and ASP is that the method provides a rapid, reliable, rugged, simple, safe and cost-effective extraction method (especially in low-volume laboratories) for PSP and ASP that can supplement accepted tests and substantially reduce the cost of analyses. Used in conjunction with other rapid methods, the Jellett Rapid Extraction Method for PSP and ASP will supplement regulatory agency efforts and help prevent the harvest of contaminated product. Having the ability to conduct tests using an accepted rapid extraction method will allow those processors who choose to use this test to demonstrate that they are truly controlling for PSP and ASP hazards in the harvested shellfish.

The Jellett Rapid Extraction Method for PSP and ASP could contribute to building long-term databases on broader scales than a regulatory lab can afford and, by using an accepted standardized method, will provide consistent results. These databases could be supplemented with industry testing in areas where there is no testing currently. This would extend, augment and strengthen the current food safety system broadening and refining the food safety net by increasing the number of testing sites and generating long term data in more areas.

A simple, rapid, rugged, effective, reliable, safe and cost-effective extraction method, available to all harvesters, regulators, and processors, would increase the monitoring and reduce the chance that shellfish containing ASP toxins above the regulatory limit would be harvested or marketed.

Cost Information (if available): It is difficult to determine exact costs because many government cost models do not consider capitol costs. Both extraction methods are the same through puree step, the chemicals used in both cases are minimal, as is the cost of incidental equipment (blender, pipettes, etc.). However, a comparison of time required using the Rapid Extraction Method (Add rapid liquid; Filter) with the time required using the AOAC Extraction (Add HCL; Boil; Wait; Filter; Pour in tube; Check PH) shows a significant difference. Our experience shows that it takes about 22 minutes for this portion of the AOAC extraction while it takes less than 2 minutes to complete the Jellett Rapid Extraction Method. At a salary of $33 / hour, that is a savings of $11.00 per sample extract.

Action by 2005 Laboratory Methods Review Committee Recommended referral of Proposal 05-111 to the appropriate committee as determined by the Conference Chairman.

Action by 2005 Task Force I Recommended adoption of the Laboratory Methods Review Committee recommendation of Proposal 05-111.

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

Action by USFDA Concurred with Conference action.

Action by 2007 Laboratory Methods Review Committee Recommended no action on Proposal 05-111. Rationale – Alternative extraction method for JRT PSP should be adopted to expand utility of the test; however there are insufficient data for acceptance at this time. The submitter will send data to the Executive Office for Conference approval.

Action by 2007 Task Force I Recommended referral of Proposal 05-111 to an appropriate committee as determined by the Conference Chairman.

Action by 2007 General Assembly Adopted recommendation of 2007 Task Force I.

Action by USFDA December 20, 2007
Concurred with Conference action with the following comments and recommendations for ISSC consideration.

The Conference has made considerable progress in its efforts to recognize new and developing analytical methods for the detection of indicators, pathogens, and marine toxins. Much credit goes to the Laboratory Methods Review Committee and its leadership for ensuring a scientifically defensible process for adopting analytical methods under the NSSP.

At the 2007 meeting numerous analytical methods were proposed for ISSC adoption. However, many of these methods were lacking the validation and associated data needed by the Laboratory Methods Review Committee to make a final determination regarding their efficacy for use in the NSSP. As a result the General Assembly voted "No Action" on analytical method Proposals 05-107, 05-108, 05-109, 05-111, 05-113, and 05-114. It is FDA's understanding that the intent of the "No Action" vote was not to remove these Proposals from ISSC deliberation as "No Action" normally suggests, but rather to maintain them before the Conference pending submission of additional data for further consideration. The Voting Delegates, by requesting the Proposal submitters provide additional data to the Executive Office for methods approval consistent with Procedure XVI, clearly recognized the importance and utility of these methods and intended to maintain them before the Conference for possible adoption following additional data submission. FDA requests that the ISSC Executive Board confirm FDA's understanding of this outcome. FDA fully supports such a Conference action and encourages the Executive Office to pursue submission of additional data as necessary to move forward with acceptance of these methods.

Action by 2009 Laboratory Methods Review Committee

Recommended no action on Proposal 05-111. Rationale: Requested additional information has not been submitted.

Action by 2009 Task Force I

Recommended adoption of Laboratory Methods Review Committee recommendation of Proposal 05-111.

Action by 2009 General Assembly

Referred Proposal 05-111 to the Laboratory Methods Review Committee.

Action by USFDA 02/16/2010

Concurred with Conference action on Proposal 05-111.

Action by 2011 Laboratory Methods Review Committee

Recommended acceptance of the rapid extraction method in Proposal 05-111, specifically 70% isopropanol:5% acetic acid 2.5:1, only for use with the Abraxis shipboard ELISA for PSP as an Emerging Method solely for use in the onboard screening dockside testing protocol in the Northeast region, including George's Bank.

The Laboratory Methods Review Committee further recommended:

1. The data collected during the dockside testing study be submitted to the LMRC in the SLV Method Application Protocol within 6 months of the concurrence by FDA in the Summary of Actions.

2. The validation study conducted by the State of Maine of the Abraxis laboratory ELISA with the extraction method in Proposal 05-111 be submitted to the LMRC in the SLV

Method Application Protocol within 6 months of the concurrence by FDA in the Summary of Actions.

3. No action on the requested language change in Proposal 05-111 for the Model Ordinance Section II, Chapter III Laboratory @.02 Methods.

Section II, Chapter III Laboratory @.02 Methods
C. Biotoxin. Methods for the analyses of shellfish and shellfish harvest waters shall be:
(1) The current AOAC and APHA methods used in bioassay for paralytic shellfish poisoning toxins; and
(2) The current APHA method used in bioassay for *Karenia breve* toxins.
~~**(3) The Jellett Rapid Extraction Method may be used for extracting PSP and ASP toxins from Shellfish by regulatory and industry laboratories.**~~

Action by 2011 Task Force I Recommended adoption of Laboratory Methods Review Committee recommendations on Proposal 05-111.

Action by 2011 General Assembly Adopted recommendation of 2011 Task Force I on Proposal 05-111.

Action by FDA February 26, 2012 Concurred with Conference action on Proposal 05-111.

Lab #	CFIA Sample #	CFIA Result HPLC (µg/g)	Jellett Result Approx. (µg/g)
04-01847	1	24.1	16-24
04-02156	2	1.4	0-4
04-01784	3	70.0	72-80
04-01968	4	71.9	72-92
04-01647	5	8.9	12-16
04-02328	6	9.3	6.4-11.2
04-02467	7	4.2	6.0-7.2
04-01646	8	31.2	40-64
04-02351	9	9.4	9.6-12
04-02238	10	4.7	4-5.6
04-01862	11	96.7	60-80
04-02240	12	10.3	12-20
04-01750	13	30.7	24-32
04-02231	14	2.5	0-4
04-01969	15	40.1	64-72

Jellett Rapid Testing Ltd.: NOAA Study - JREM Trial
Sample Record Sheet – Homogenate
State of Alaska - Department of Environmental Conservation

	Collection		Homogenization			Jellett Test						MBA Test					
Sample ID	Date	Species	Field / Site / Lab Name	Date	Size of Sample (mL)	Field / Site / Lab Name	Date	Batch # - Test	Batch # - Buffer	Result (1=Pos, 0=Neg)	Intensity of C Line as % of T	Lab Name	Date	Toxin Standard Used	# of Mice Dead	Result (µg/100g)	# of Mice Sick
20053168-C	3/06/05	Geoduck Viscera	ADEC-EHL	3/14/05	66[2]	ADEC-EHL	3/14/05	40000-13Aug04	40005-05Nov04	1	0%	ADEC-EHL	03/15/05	FDA	3	71	0
20053169-C	3/06/05	Geoduck Viscera	ADEC-EHL	3/14/05	495	ADEC-EHL	3/14/05	40000-13Aug04	40005-05Nov04	1	<10%	ADEC-EHL	03/15/05	FDA	3	39	0
20053170-C	3/06/05		ADEC-EHL	3/14/05	650	ADEC-EHL	3/14/05	40000-13Aug04	40005-05Nov04	1	0%	ADEC-EHL	03/15/05	FDA	3	71	0
20053183-C	3/13/05	Geoduck	ADEC-EHL	3/15/05	416	ADEC-EHL	3/15/05	40000-13Aug04	40005-05Nov04	1	>0%, <25%	ADEC-EHL	03/15/05	FDA	3	70	0
20053184-C	3/13/05	Geoduck	ADEC-EHL	3/15/05	632	ADEC-EHL	3/15/05	40000-13Aug04	40005-05Nov04	1	0%	ADEC-EHL	03/15/05	FDA	3	54	0
20053185-C	3/14/05	Geoduck	ADEC-EHL	3/15/05	561	ADEC-EHL	3/15/05	40000-13Aug04	40005-05Nov04	1	0%	ADEC-EHL	03/15/05	FDA	3	72	0
20053186-C	3/15/05	Geoduck	ADEC-EHL	3/15/05	301	ADEC-EHL	3/15/05	40000-13Aug04	40005-05Nov04	1	0%	ADEC-EHL	03/15/05	FDA	3	90	0
20053137	03/06/05	Oyster	ADEC-EHL	03/08/05	150	ADEC-EHL	03/08/05	40000-13Aug04	40005-05Nov04	INV	C <25% T	ADEC-EHL	03/08/05	FDA	0	NDT	0
20053136	03/06/05	Oyster	ADEC-EHL	03/08/05	500	ADEC-EHL	03/08/05	40000-13Aug04	40005-05Nov04	N/A INV	C <25% T	ADEC-EHL	03/08/05	FDA	0	NDT	0
20053138	03/05/05	Oyster	ADEC-EHL	03/08/05	500	ADEC-EHL	03/09/05	40000-13Aug04	40005-05Nov04	INV	C <25% T	ADEC-EHL	03/08/05	FDA	0	NDT	0
20053142	03/06/05	Oyster	ADEC-EHL	03/09/05	50	ADEC-EHL	03/09/05	40000-13Aug04	40005-05Nov04	INV	C <50% T	ADEC-EHL	03/09/05	FDA	0	NDT	0
20053124-C	3/5/05	Geoduck	ADEC-EHL	3/7/05	495	ADEC-EHL	3/7/05	40000-13Aug04	40005-05Nov04	1	0%	ADEC-EHL	03/07/05	FDA	3	117	0
20053125-C	3/5/05	Geoduck	ADEC-EHL	3/7/05	404	ADEC-EHL	3/7/05	40000-13Aug04	40005-05Nov04	1	75%	ADEC-EHL	03/07/05	FDA	3	58	0
20053006	2/29/05	Oyster	ADEC-EHL	3/3/05	125	ADEC-EHL	3/3/05	40000-13Aug04	40005-05Nov04			ADEC-EHL	3/3/05	FDA	0	NDT	0
20053040-C	03/01/05	Geoduck Viscera	ADEC-EHL	03/02/05	545	ADEC-EHL	03/02/05	40000-13Aug04	40009-06Oct04	1	50%	ADEC-EHL	03/02/05	FDA	3	86	0
20053039-C	03/01/05	Geoduck Viscera	ADEC-EHL	03/02/05	340	ADEC-EHL	03/02/05	40000-13Aug04	40009-06Oct04	1	10%	ADEC-EHL	03/02/05	FDA	3	175	0
20053007-C	02/26/05	Geoduck Viscera	ADEC-EHL	02/28/05	750	ADEC-EHL	03/01/05	40000-13Aug04	40009-06Oct04	1	25%	ADEC-EHL	02/28/05	FDA	3	59	0
20053010-C	02/26/05	Geoduck Viscera	ADEC-EHL	02/28/05	750	ADEC-EHL	03/01/05	40000-13Aug04	40009-06Oct04	1	<25%	ADEC-EHL	02/28/05	FDA	3	65	0
2005301-C	02/27/05	Geoduck Viscera	ADEC-EHL	02/28/05	750	ADEC-EHL	03/01/05	40000-13Aug04	40009-06Oct04	1	0%	ADEC-EHL	02/28/05	FDA	3	151	0

Jellett Rapid Testing Ltd.: NOAA Study
JREM Trial Sample Record Sheet - Homogenate
California - Microbial Disease Lab

	Collection		Homogenization			Jellett Test						MBA Test					
Sample ID	Collection Date	Species	Field / Site / Lab Name	Date	Size of Sample (mL)	Field / Site / Lab Name	Date	Batch # - Test	Batch # - Buffer	Result (1=Pos, 0=Neg)	Intensity of C Line as % of T	Lab Name	Date	Toxin Standard Used	# of Mice Dead	Result µg/100g	# of Mice Sick
05E-00110	02/05/05	LBMU	CA-DHS-EMDS	02/09/05	>130	CA-DHS-EMDS	02/09/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	2/09/05	FDA	0	<36	0
05W-00099	02/01/05	SSMU	CA-DHS-EMDS	02/02/05	>130	CA-DHS-EMDS	02/02/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	02/02/05	FDA	0	<34	0
05E-00096	02/28/05	CBMU	CA-DHS-EMDS	02/02/05	>130	CA-DHS-EMDS	02/02/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	02/02/05	FDA	0	<36	0
05W-00093	02/01/05	SBMU	CA-DHS-EMDS	02/02/05	>130	CA-DHS-EMDS	02/02/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	02/02/05	FDA	0	<36	0
05W-00079	01/25/05	SSMU	CA-DHS-EMDS	01/26/05	>130	CA-DHS-EMDS	01/26/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	1/26/05	FDA	0	<35	0
05W-00076	01/22/05	CBMU	CA-DHS-EMDS	01/26/05	>130	CA-DHS-EMDS	01/26/05	40000-8/13/04	40005-9/7/04	1	50%	CA-DHS-EMDS	01/26/05	FDA	3	39	0
05W-00069	01/24/05	SBMU	CA-DHS-EMDS	01/26/05	>130	CA-DHS-EMDS	01/26/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	01/26/05	FDA	0	<36	3
05W-00059	01/18/05	SSMU	CA-DHS-EMDS	01/19/05	>130	CA-DHS-EMDS	01/19/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	1/19/05	FDA	0	<35	3
05W-00055	01/14/05	CBMU	CA-DHS-EMDS	01/18/005	>130	CA-DHS-EMDS	01/18/05	40000-8/13/04	40005-9/7/04	1	25%	CA-DHS-EMDS	01/18/05	FDA	3	37	
05W-00052	01/17/05	SBMU	CA-DHS-EMDS	01/18/05	>130	CA-DHS-EMDS	01/18/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	01/18/05	FDA	0	<36	0
05W-00025	1/10/05	SBMU	CA-DHS-EMDS	1/12/05	>130	CA-DHS-EMDS	1/12/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	1/12/05	FDA	0	<35	0
05W-00023	1/11/05	SSMU	CA-DHS-EMDS	1/12/05	>130	CA-DHS-EMDS	1/12/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	1/12/05	FDA	0	<36	0
05W-00020	1/7/05	CBMU	CA-DHS-EMDS	01/11/05	>130	CA-DHS-EMDS	01/11/05	40000-8/13/04	40005-9/7/04	1	25%	CA-DHS-EMDS	1/11/05	FDA	3	44	0

Jellett Rapid Testing Ltd.: NOAA Study
JREM Trial Sample Record Sheet - Homogenate
California - Microbial Disease Lab (CONTINUED)

	Collection		Homogenization			Jellett Test						MBA Test					
Sample ID	**Collection Date**	**Species**	**Field / Site / Lab Name**	**Date**	**Size of Sample (mL)**	**Field / Site / Lab Name**	**Date**	**Batch # - Test**	**Batch # - Buffer**	**Result (1=Pos, 0=Neg)**	**Intensity of C Line as % of T**	**Lab Name**	**Date**	**Toxin Standard Used**	**# of Mice Dead**	**Result µg/100g**	**# of Mice Sick**
05W-00011	1/3/05	SBMU	CA-DHS-EMDS	1/5/05	>130	CA-DHS-EMDS	1/5/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	1/5/05	FDA	0	<34	0
05W-00007	1/4/05	SSMU	CA-DHS-EMDS	1/5/05	>130	CA-DHS-EMDS	1/5/05	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	1/5/05	FDA	0	<34	0
05W-00002	12/30/04	CBMU	CA-DHS-EMDS	1/04/05	>130	CA-DHS-EMDS	1/04/05	40000-8/13/04	40005-9/7/04	0	75%	CA-DHS-EMDS	1/04/05	FDA	2	36	1
04W-01458	12/28/04	SSMU	CA-DHS-EMDS	12/29/04	>130	CA-DHS-EMDS	12/29/04	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	12/29/04	FDA	0	<36	0
04W-01454	12/27/04	SBMU	CA-DHS-EMDS	12/29/04	>130	CA-DHS-EMDS	12/29/04	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	12/29/04	FDA	0	<36	0
04W-01457	12/24/04	CBMU	CA-DHS-EMDS	12/28/04	>130	CA-DHS-EMDS	12/28/04	40000-8/13/04	40005-9/7/04	1	<25%	CA-DHS-EMDS	12/28/04	FDA	3	42	0
04W-1446	12/21/04	SSMU	CA-DHS-EMDS	12/22/04	>130	CA-DHS-EMDS	12/22/04	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	12/22/04	FDA	0	<34	0
04W-01436	12/20/04	SBMU	CA-DHS-EMDS	12/21/04	>130	CA-DHS-EMDS	12/21/04	40000-8/13/04	40005-9/7/04	0	75%	CA-DHS-EMDS	12/21/04	FDA	0	<34	3
04W-01399	12/13/04	SBMU	CA-DHS-EMDS	12/14/04	>130	CA-DHS-EMDS	12/15/04	40000-8/13/04	40005-9/7/04	1	50%	CA-DHS-EMDS	12/15/04	FDA	2	35	0
04W-01421	12/11/04	CBMU	CA-DHS-EMDS	12/15/04	>130	CA-DHS-EMDS	12/15/04	40000-8/13/04	40005-9/7/04	1	0%	CA-DHS-EMDS	12/15/04	FDA	3	48	0
04W-01424	12/14/04	SSMU	CA-DHS-EMDS	12/15/04	>130	CA-DHS-EMDS	12/15/04	40000-8/13/04	40005-9/7/04	0	100%	CA-DHS-EMDS	12/15/04	FDA	0	<35	0