Proposal Subject: Using Male-specific Coliphage as a Tool to Refine Determinations of the Size of the Areas

to be Classified as Prohibited Adjacent to Each Outfall

Specific NSSP Guide Reference: NSSP 2009 Section II Model Ordinance Chapter IV Shellstock Growing Areas @.03 Growing Area Classification E. (5)

Text of Proposal/ Requested Action

(c) An assessment of the combined impact of waste water treatment plant outfall and/or exfiltration (leakage) from sewerage collection systems may be performed using male-specific coliphage assays on shellstock from adjacent growing areas. A male-specific coliphage standard of \leq 50 PFU/100gm in shellfish meats may be used as the basis for the determination of the size of the adjacent area to be classified as conditionally restricted or approved.

Public Health Significance:

Male-specific Coliphage (MSC) is a RNA virus of E. coli present in high numbers in raw sewage (on the order of 10⁵ PFU/100gm). MSC is similarly resistant to chlorine disinfection as are norovirus and hepatitis A viruses, which are the viral pathogens of concern in sewage. MSC is a good surrogate or marker for these enteric viruses and is a powerful tool to assess the impact on a growing area of raw, partially treated and treated sewage on adjacent growing areas. US and EU studies show that during the summer months MSC and associated pathogenic enteric viruses are at seasonal lows. Conversely, the risk of viral disease transmission is significantly higher in the winter months as evidenced by epidemiological studies as well as studies conducted using MSC and molecular detection of target pathogens.

A better assessment of the risk of viral contamination at a particular location in an adjacent growing area at a particular time of year can be ascertained directly using MSC assays of the shellstock. Performing and evaluating dye studies on waste water treatment plant outfall evaluation is expensive and complicated. Difficulties assessing ex-filtration and leakage from the sewage collection system are well known. Few tools and less guidance are available to adequately assess the performance of a particular waste water treatment plant design and its operation with respect to virus removal. The advantages of using this specialty viral indicator to assess the overall impact of a municipal wastewater treatment system on a particular growing area are many. In growing areas impacted by waste water treatment systems, positive norovirus detected by molecular methods at significant levels in the shellfish are accompanied by corresponding high levels of MSC. MSC assays are a direct and straightforward method to determine the viral risk or validate traditional assessment techniques.

Cost Information (if available):

The Male-specific Coliphage (MSC) method is an inexpensive double-agar pour plate method, which can be run in any state-certified microbiological laboratory. A refrigerated centrifuge capable of 9,000G is required which costs \$10K to \$12K (USD). Cost savings and a higher level of public health protection may be realized using MSC assays of shellfish verses the level of effort needed to ascertain the viral risk indirectly through dye studies, 1000:1 dilution line determinations and performance evaluations.

Action by 2011 Task Force I

Recommended referral of Proposal 11-102 to the appropriate committee as determined by the Conference Chairman. FDA is requested to prepare and provide MSC data from wastewater treatment plant sampling to the committee. FDA is further requested to involve the submitter in this proposal in analyzing that data.

Action by 2011 General Assembly

Adopted recommendation of 2011 Task Force I on Proposal 11-102.

Action by FDA February 26, 2012

FDA concurred with Conference action on Propoposal 11-102 with the following recommendations.

FDA concurs with Conference action to refer Proposal 11-102 to an appropriate committee as determined by the Conference Chairperson. The intent of these Proposals is to expand the application of Male Specific Coliphage (MSC) for use in the management of conditional areas affected by raw or partially untreated sewage discharges from wastewater treatment plants (WWTP) or community sewage collection systems and for assessing the impact of WWTP discharges and/or sewerage collection system leaks in determining the size of adjacent areas for classification as conditionally restricted or conditionally approved. Presently, however, there is insufficient data from which to make sound science based decisions regarding the use of MSC as a more comprehensive tool for growing area management.

Support for using MSC for conditional area management is based on uptake and elimination data for a single shellfish species, soft-shelled clams (*Mya arenaria*), impacted by effluent from a highly efficient WWTP at one geographic location over just one harvest season. Those data are not adequate to ensure the efficacy of MSC to safely manage other conditional areas for other species of shellfish, in other geographic regions, and over other seasons.

Careful consideration needs to be given to the fact that a WWTP malfunction is often a consequence of adverse weather conditions, most notably excessive rainfall over short periods. Such rainfall events usually cause excessive land based runoff, carrying non-point fecal pollution to conditional areas. While MSC are generally ubiquitous in municipal wastewater, that is not the case with smaller pollution sources. For this reason MSC are inappropriate for indexing smaller sources and do not lend themselves well to managing areas subject to pollution from both WWTPs and other sources. Shellfish associated norovirus (NoV) outbreaks investigated by FDA's Gulf Coast Seafood Laboratory (GCSL) in the past several years have, in nearly all instances, shown MSC levels in shellfish below the assay's sensitivity(< 10 pfu/IOOml), while testing positive for NoV. These results indicate that the source of NoV was not from a WWTP. Though MSC appear to have utility and promise in assessing potential viral contamination in shellfish, much remains to be learned about their prevalence and ability to reliably index fecal contamination from various sources of human sewage.

Several approaches for generating additional information and data needed to better define how MSC could potentially be used for growing area management and classification include:

- Continued studies to examine the uptake and elimination of NoV, enterovirus, and MSC by shellfish species other than soft-shelled clams. These investigations should be conducted in multiple geographic locations representative of the country and over all seasons.
- A SL V has been conducted and adopted by the ISSC for the method to enumerate SC in soft-shelled clams and oysters. A SL V is needed to demonstrate the efficacy of this or another method to enumerate MSC in other species of shellfish.
- Understanding the efficiency of various wastewater treatment systems to inactivate/remove enteric viruses prior to discharge.

• Continued studies to examine and compare MSC and enteric virus levels in wastewater influent and effluent, shellfish receiving waters, and shellfish.

As requested by Task Force I, information is currently being compiled by FDA regarding MSC data from WWTP sampling. Those data should be available to the ISSC in March, 2012.