

Overall we believe that this Committee draft is a good start at updating the Model Ordinance to eliminate outdated requirements, eliminating some ambiguities, inconsistencies and to provide additional documentation necessary to improve the time/temperature history and accompanying records under certain conditions. We appreciate all of the hard work of the ISSC and the Shipping/Receiving Committee.

In reviewing the 2/15 Draft we do have a few comments:

General Comments

Under ideal circumstances we would like to see molluscan shellfish whenever possible pre-chilled to 50 F prior to interstate shipment by the "original dealer" and require internal shellfish temperatures at receiving over the option of ambient temperatures of conveyances in order to establish that the shellfish was cooled to at least 50 F and maintained that way during transportation.

Specific Comments

1) In Chapter VIII of the existing MO under .03 Shellstock Temperature Control the "Note" that reads " the time-temperature matrix for each of the options applies only to the original harvester or harvester/dealer of shellstock for the purposes of handling and transporting shellstock to the first point of processing or packing" was stricken. It was our understanding that this "note" was placed into the MO to clarify a misunderstanding that the time-temperature matrix only applied to the harvester and once shellstock arrived at the initial dealer the matrix no longer applied or continued and temperature control had to begin. This "note" no longer appears. There is concern that the dealer could misinterpret the harvester T/T matrix and extend the time out of temperature to the maximum time remaining under the matrix.

Under Chapter XI, XII, XIII & XIV of the MO in Section .01 Critical Control Points under paragraph A.(3) states that shellstock received from the original dealer which does not meet the requirements of A.2.(a), (b), or (c) must meet certain other requirement, including specific records. We are

concerned that unless there are established maximum time limits and maximum temperature allowances for acceptance as a CCP at "Receiving", shellfish accepted under A.(3) could well have been received with inadequate time and temperature control. For example, the original dealer could load shellstock, that does meet the A.(1) or A.(2) requirement, onto a truck and ship it across the country whereby upon arrival the A.(3) record indicates the product temperature at loading was 70 F and at receipt it was still 70 F. Under this scenario the shellstock would be considered acceptable for receipt even though it remained at 70F for a trip that took well over 24 hours. A. (3) offers little assurance of adequate time and temperature control.

In addition, there are no criticality codes assigned for these changes under any of the chapters.

Under the existing MO, Shucker-Packers and Shellstock Shippers that are NOT the initial dealer and Reshippers can only accept shellstock that is either iced, or received at an ambient temperature of 45 F or an internal temperature of 50 F. In the existing MO Chapters XI, XII & XIV (not XII Repacker of Shucked Product) there are no provisions to accept shellstock that does not meet those criteria. We are concerned that although the intent may be to strengthen recordkeeping and T/T controls, the provisions of A. (3) lessens the existing controls.

2) Under Chapter XI, XIII and XIV at .01.2 "Critical Control Points", the requirement for shellstock to be identified with a tag on each container has been deleted.