



August 29, 2012

SEP 04 2012

Ken B. Moore, Executive Director
Interstate Shellfish Sanitation Conference
209-2 Dawson Road
Columbia, SC 29223

Dear Mr. Moore:


The Conference for Food Protection (CFP) recognizes the important role that the Interstate Shellfish Sanitation Conference (ISSC) plays in helping ensure that raw molluscan shellfish sold commercially is safe and properly labeled. CFP's mission is the promotion of food safety protocols contained in the US Food and Drug Administration (FDA) Food Code, including the requirements for receiving, holding, and labeling of raw molluscan shellfish.

At its 2012 biennial meeting in Indianapolis, the CFP recommended that the CFP and the ISSC jointly author a letter to be sent to State retail food programs. The purpose of the letter is to request that food retailers be advised of the shellstock compliance and identification record requirements for the purpose of improving compliance per the US FDA Food Code.

The requirements established by ISSC and contained in the Food Code for safe harvesting, storage, transportation, and sale of raw molluscan shellfish are essential to ensure that consumers are protected from foodborne illness. It is extremely important that all State retail food safety programs adopt the requirements and ensure that retailers comply.

Please advise if ISSC is interested joining with CFP on such a project at this time. Thank you for your consideration.

Sincerely,



Jeffrey C. Lineberry, MPH
Executive Director

**Conference for Food Protection
2012 Issue Form**

**Internal Number: 095
Issue: 2012 I-023**

Council	Accepted as	Accepted as	
Recommendation:	Submitted _____	Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

All information above the line is for conference use only.

Title:

Shellstock Record Keeping

Issue you would like the Conference to consider:

Modification of the 2009 FDA Food Code to add language that addresses the use of shellstock being simultaneously used from different sources or growing areas. The facility's record-keeping system must be able to distinguish the shellstock that was served to each customer.

Public Health Significance:

The Interstate Shellfish Sanitation Conference (ISSC) continues to address illnesses associated with consumption of raw molluscan shellfish. Our primary focus is to improve our response time associated with illness outbreaks and to evaluate the effectiveness of control programs associated with pathogens which may result in illnesses.

These activities utilize illness investigation information from retail establishments. In recent years there has been improvement and the suggested change is intended to further improve the ability of illness investigators to accurately identify shellstock sources and growing areas. The ISSC and the Conference for Food Protection (CFP) have jointly worked to enhance record keeping at the retail level. In an effort to provide more accurate information which could be used for illness response and program evaluation, the need for this improvement was demonstrated in recent illness data reported by the Centers for Disease Control (CDC).

Recommended Solution: The Conference recommends...:

1. that a letter be sent to the FDA requesting the 2009 Food Code (as modified by the Supplement issued in 2011) be amended as follows (new language underlined and deleted language shown with strikethrough):

Section 3-203.12, Shellstock, Maintaining Identification

(C) The identity of the source of shellstock that are sold or served shall be maintained by retaining shellstock tags or labels for 90 calendar days from the date that is recorded on the tag or label, as specified under ¶ B of this section, by: ^{Pf}

(1) Using an approved record keeping system that keeps the tags or labels in chronological order correlated to the date that is recorded on the tag or label, as specified under ¶ B of this section; ^{Pf} and

(2) If shellstock are being used from different sources or growing areas simultaneously that the system can distinguish the source and growing area of the shellstock that was served to each customer; ^{Pf} and

(23) If shellstock are removed from its tagged or labeled container
and

2. that the Conference for Food Protection (CFP) *and* the Interstate Shellfish Sanitation Conference (ISSC) jointly write a letter to State retail food programs requesting that retailers be advised of shellstock identification record requirements for the purpose of improving compliance.

Submitter Information:

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It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.

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Recommendation:	Submitted	_____	Amended	_____
			X	No Action _____
Delegate Action:	Accepted	x _____	Rejected	_____

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Title: Shellstock Record Keeping

Recommended Solution:

The Conference recommends the Conference for Food Protection (CFP) *and* the Interstate Shellfish Sanitation Conference (ISSC) jointly write a letter to State retail food programs requesting that retailers be advised of shellstock compliance and identification record requirements for the purpose of improving compliance per the FDA Food Code.