ISSC 2017 Committee Report

Plant Standardization Advisory **Committee Name: Chairperson:** Kim Stryker **Date of Meeting:** Approved By: **Recorder: Printed Name:** Kim Stryker **Committee Members Present:** (FDA Delegate) ⊠Kim Stryker ■ Robert Hein □ Debbie Rouse (Chairperson) ⊠Angela Ruple ☑ Eric Hickey ☑ Danielle Schools □Erik Broussard (NOAA Delegate) ☐ Shawn Nelson ☐ Debra Scoville ⊠ Kim Coulbourne □Joel Hansel (EPA Delegate) ☐ David Phinney ☐ Jeff French ⊠Raymond Burditt

Charges

Charge 1: Review reported issues associated with shellfish plant standardization.

The committee discussed whether there is value in reviewing and editing a document that provided cross-references between the violation numbers on the 2013 NSSP inspection form and the corresponding references in the 2015 NSSP Model Ordinance. This document was developed to allow inspection staff the ability to document observations in the field and generate an electronic inspection. The purpose of the committee's review would be to note any errors or disagreements with where references should be marked, make corrections as appropriate, and widely share the document among shellfish authorities. Jurisdictions could use the document to develop their own electronic inspection systems and to promote uniformity (both within the jurisdiction and throughout the nation) in marking observations.

At least three other jurisdictions represented on the committee (VA, MD, and FL) reported that they had also developed similar spreadsheets, as well as "cheat sheets" designed to aid field staff.

During development of the cross-reference document, the originator of the document noted possible inconsistencies among the 2013 NSSP inspection form, the 2015 NSSP Standardization Field Guide, and the MO. As well, there could be opportunities to streamline the MO by relocating those provisions that are applicable to all types of operations (instead of repeating those provisions in each chapter).

During discussion, Raymond Burditt explained to the committee members that the field guide was never intended to be used by state shellfish officers or inspectors. Rather, it was FDA's document, intended for its shellfish specialists, many of whom did not utilize the document. When I rereviewed the document, the introduction seems to indicate otherwise. The first sentence reads, "This Field Guide has been prepared to assist state shellfish standardization officials and inspectors in the use of the NSSP Standardized Shellfish Processing Plant Inspection Form." The committee asks for clarification of the intended audience and purpose of the document.

Findings/Conclusions:

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The committee asked the originator to forward the attached documents to each of the committee members.

Recommendations:

Attachments:

- Shellfish Violations.docx
- ShellfishViolations.xls
- 2015 field guide final 3-11-2015.pdf

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