Proposal No. 15-109

Proposal for Task Force Consideration at the ISSC 2027 Biennial Meeting	1. a. X Growing Area b. ☐ Harvesting/Handling/Distribution c. ☐ Administrative

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Proposal Subject	PSP HPLC-PCOX Species Expansion
Specific NSSP Guide Reference	Section IV. Guidance Documents Chapter II Growing Areas .11 Approved NSSP Laboratory Tests
Text of Proposal/ Requested Action	4. Approved Limited Use Methods for Marine Biotoxin Testing PCOX This submission presents data to support the use of PCOX method for Quahogs (M. mercenaria and A. icelandica), Surf Clams (S. solidissima), Geoducks (P. generosa), Butter Clams (S. giganteus), Little Neck Clams (P. stamineais), and Razor Clams (S. patula) for regulatory paralytic shellfish toxin (PST) testing. Results of the 2009 Interstate Shellfish Sanitation Conference (ISSC) proposal 09- 104 concluded the PCOX method approved for official use as a Type IV method; subsequently after single laboratory validation (SLV) and collaborative studies, ISSC proposal 13-309 accepted PCOX method as an AOAC official method of analysis (OMA) in 2013. Currently PCOX is an "Approved for Limited Use" method for mussel, clam, oyster and scallop. SLV work will be presented for quahogs, surf clams, geoducks, butter clams, little neck clams, and razor clams that demonstrates comparable performance characteristics for these species as with mussels, clams, oysters, and scallops using the PCOX method. The cost and challenges associated with maintaining both the MBA and PCOX methods for these species are high; differing laboratory skill sets are required and state laboratories have limited budgets and staff resources. Additionally, the recent shortage of the NIST saxitoxin standard used for MBA proficiencies is of concern if laboratories are expected to maintain MBA for verification purposes for these species. The requested action is being made and data presented for the purpose of inclusion of quahogs, surf clams, geoducks, butter clams, little neck clams, and razor clams as approved species (by addition to the footnote that includes mussels, clams, oysters, and scallops or as the ISSC deems appropriate) within the NSSP Guide Section IV Guidance Documents Chapter II. Growing Areas .11 Laboratory Tests Methods Table, Methods for Marine Biotoxin Testing with Biotoxin Type: Paralytic Shellfish Poisoning (PSP), Application: Growing Area Survey & Classification Sample Type: Shellfish And Application: Controlled Relaying Sample Type: Shellfish.
Public Health Significance	The PCOX method was developed to provide a rapid, high throughput chemical assay that would eliminate the need to sacrifice animals, AOAC mouse bioassay (MBA), for toxin detection. There is a worldwide move to replace assays that use live animals as test subjects. Laboratories currently using PCOX for regulatory

	PST testing have found that the lower detection limits of the PCOX method allow for better early warning therefore better management of PST closures and significantly improved public health decision-making. The addition of the proposed species will allow regulatory laboratories to move away from the costliness of maintaining MBA and eliminate the need to sacrifice animals as well as improve management of species specific closure decision–making.
Cost Information	Total consumable costs for the analysis is estimated at $10/sample. A chemistry laboratory will usually be equipped with an LC system and a post column reactor to carry out the analysis. Total capital costs for the instrumentation required for the analysis is approximately $120,000. Although the upfront investment for instrumentation is high, the removal of care, maintenance, and cost of mice quickly offsets this expenditure.
Action by 2015 Laboratory Method Review Committee	Recommended referral of Proposal 15-109 to an appropriate committee as determined by the Conference Chair for evaluation of data and until additional data are received.
Action by 2015 Task Force I	Recommended adoption of Laboratory Method Review Committee recommendation on Proposal 15-109.
Action by 2015 General Assembly	Adopted recommendation of Task Force I on Proposal 15-109.
Action by FDA January 11, 2016	Concurred with Conference action on Proposal 15-109.
Action by 2017 Laboratory Committee	Recommended referral of Proposal 15-109 to an appropriate committee as determined by the Conference Chair.
Action by 2017 Task Force I	Recommended adoption of Laboratory Committee recommendation on Proposal 15- 109.
Action by 2017 General Assembly	Adopted the recommendation of Task Force I on Proposal 15-109.
Action by FDA February 7, 2018	Concurred with Conference action on Proposal 15-109.
Action by 2019 Laboratory Committee	Recommended referral of Proposal 15-109 to an appropriate committee as determined by the Conference Chair.
Action by 2019 Task Force I	Recommended the adoption of Laboratory Committee recommendation on Proposal 15-109.
Action by 2019 General Assembly	Adopted recommendation of Task Force I on Proposal 15-109.

Action by FDA February 21, 2020	Concurred with Conference action on Proposal 15-109.
Action by 2023 Laboratory Committee	Recommended referral of Proposal 15-109 to an appropriate committee as determined by the Conference Chairperson.
Action by 2023 Task Force	Recommended adoption of the Laboratory Committee recommendation for Proposal 15-109.
Action by 2019 General Assembly	Adopted recommendation of Task Force I on Proposal 15-109.
Action by FDA July 7, 2023	Concurred with Conference action on Proposal 15-109.