Proposal No. 2 7 - 1 2 0

Proposal for Task Force Consideration at the ISSC 2027 Biennial Meeting *(Tab to go to next field)*	1. a. ☒ Growing Area b. ☐ Harvesting/Handling/Distribution c. ☐ Administrative
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9. Proposal Subject	No Discharge Zone (NDZ) enforcement and verification
10. Specific NSSP Guide Reference	Section II, Chapter IV, @.05 B (3) (f) and @.06 A (1) (g)
11. Text of Proposal/ Requested Action	(f) ~~Documentation, verification and enforcement~~ Documentation of ~~Federal~~ No Discharge Zones and ~~locally well enforced~~local no discharge and occupancy ~~by-laws and regulations.~~regulations or by-laws (g) ~~Documentation, verification and enforcement~~Documentation of ~~federal~~ No Discharge ~~Zones, and locally well enforced~~Zones and local no discharge and occupancy regulations or by-laws.
12. Public Health Significance	No change will occur to public health protection. Established No Discharge Zones (NDZ) and local regulations/by-laws (where used) already prohibit discharges from vessels. Verification of state and local NDZ enforcement efforts by the shellfish authority does not increase the amount of compliance with federal/state/local laws and regulations and will not decrease the amount of potential illicit discharges from vessels. The pollution assessment, dilution analysis, and sizing of necessary closures around marinas and mooring areas when boats are present already account for illicit discharges from vessels. No metrics to measure compliance with this portion of the requirements exist within the NSSP-MO. NDZ enforcement and verification creates unreasonable burdens on the shellfish authority to gather large amounts of information on a regular basis from every marina and mooring facility in the conditionally approved classification. Gathering this information also places additional burdens on state and local authorities by straining resources and relationships, encouraging violation of search and seizure laws, requiring large amounts of time, effort, and personnel by law enforcement agencies, and requiring the cooperation of vessel owners and facility owners/managers to conduct inspections.
13. Cost Information	No cost is associated with this proposal.
14. Changes Needed to Guidance (if proposed change is adopted)	The Marina and Mooring Committee is currently working on proposal 23-121 and proposal 23-124, proposed guidance for marinas and moorings. These proposed changes would need to be incorporated into the work product from that proposal.