Proposal No. 2 7 - 2 0 1
Received: _____

Proposal for Task Force Consideration at the ISSC 2027 Biennial Meeting *(Tab to go to next field)*	1. a. ☐ Growing Area b. X Harvesting/Handling/Distribution c. ☐ Administrative
2. Submitter	Alfred R. Sunseri
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9. Proposal Subject	Change the definition of a Broker and add the Broker as a new Certified Dealer Type
10. Specific NSSP Guide Reference	Definitions
11. Text of Proposal/ Requested Action	Broker- means any person who is a dealer that buys oysters directly from a harvester and sells, ships and distributes those molluscan shellfish without taking ownership, physical custody, nor processes the shellfish. They are not authorized to process shellstock. They must have a means to refrigerate the harvesters shellstock upon landing to assure the shellfish are not temperature abused when the transporting vehicle is not located at the harbor when the shellstock is ready to be unloaded..
12. Public Health Significance	The old definition of a broker does not accurately describe what a molluscan shellfish broker does. Brokers need to have more "skin in the game" because of the numerous regulatory changes that have been made to the NSSP since the definition of a broker was developed. Such important developments such as time and temperature guidelines, vibrio guidelines, etc. did not exist in the NSSP when the term broker was defined. Brokers need to be more responsible for the shellstock they are selling and shipping that will be consumed raw in most cases.
13. Cost Information	N/A
14. Changes Needed to Guidance (if proposed change is adopted)	Probably and a change in the ICSSL