Proposal No. 2 7 - 2 1 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
2. Submitter	US Food & Drug Administration (FDA)
3. Affiliation	US Food & Drug Administration (FDA)
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9. Proposal Subject	Clarifying Broker and Importer roles relative to ICSSL certification
10. Specific NSSP Guide Reference	Chapter I. @.02 E.
11. Text of Proposal/ Requested Action	E. Interstate Certified Shellfish Shippers List (ICSSL). (1) When the Authority certifies a person to become a dealer, the Authority shall notify the FDA for the purpose of having the dealer listed in the ICSSL. This includes dealers who are importers that own the product even if they do not take physical custody of the shellfish. This does not include brokers who do not own or take physical custody of the shellfish. The Authority shall include the certification type and any permit designation to be included in the ICSSL. The notice shall be in the format of FDA Form 3038.
12. Public Health Significance	A word search for the terms 'broker' and 'importer' in the NSSP-MO reveals that the only usage of those terms currently in the MO is in the Definitions section, likely included to reference terms used in relevant CFRs. This proposal attempts to clarify why those terms are important relative to the NSSP and dealer certification. As the ICSSL is used as a reference document when determining admissibility of imported shellfish into U.S. commerce, it is important that State Authorities understand which entities should be permitted as dealers for inclusion in the ICSSL. In short, brokers neither own nor take possession of shellfish, and are not required to be permitted or listed in the ICSSL. Importers, who by definition own the product (regardless of whether they take physical possession), have a legal obligation to ensure those shipments meet U.S. acceptability criteria, and are therefore required to be inspected and permitted by state authorities for inclusion in the ICSSL.
13. Cost Information	None. This proposal only attempts to clarify existing NSSP requirements.
14. Changes Needed to Guidance (if proposed change is adopted)	TBD