Proposal No. 2 7 - 2 4 5

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)
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9. Proposal Subject	Require geoduck shipments have a Chapter IX. transportation document so that receiving secondary dealers can meet current HACCP Receiving Critical Limits for shipments of four (4) hours or less
10. Specific NSSP Guide Reference	Chapter IX. .05 C.
11. Text of Proposal/ Requested Action	Chapter IX. .05 C. Geoduck clams (*Panopea generosa*) are exempt from ~~these requirements~~ the requirements in .05 B. above.
12. Public Health Significance	The current exemptions for geoduck in Chapters XIII .01 B. and IX .04 and .05 could prevent secondary dealers from meeting current HACCP receiving critical limits. Chapter XIII .01 B. (5), exempts geoduck, which are being cooled using an Authority-approved tempering plan, from the requirement to be cooled to an internal temperature of 50°F prior to shipment. Chapter IX .04 exempts geoduck from the requirements of being shipped iced, or in a pre-chilled conveyance at or below 45°F, and Chapter IX .05 exempts geoduck shipments from needing a transportation record that has the time and temperature at shipment. However, there still exists the HACCP Receiving Critical Limits in Chapters XIII and XIV .01 that secondary dealers receive only shellstock which has been "cooled to an internal temperature of 50°F (10°C) or less", or if Chp. VIII. @.02 A.(3) shellstock is shipped prior to being cooled to 50°F (geoduck), that it either be accompanied by a time/temperature recording device indicating continued cooling

	has occurred, or if the shipment time is four (4) hours or less, that the shipment have documentation as required in Chapter IX. 05 A. (which we established earlier that geoduck are currently exempt from having). For a secondary dealer to meet the current receiving critical limits for geoduck that was shipped (four hours or less) by the original dealer above 50°F, the geoduck would need to cool in-transit to 50°F or below, a scenario that could be unlikely for local shipments. This proposal attempts to fix this discrepancy by requiring shipments of geoduck to be accompanied by transportation document indicating the ship date, time and temperature at shipment.
13. Cost Information	No cost to industry aside from requiring original dealers that ship geoduck to record date/time/temperature at shipment on a transportation record. Potential cost-savings to industry by preventing local geoduck shipments from being rejected.
14. Changes Needed to Guidance (if proposed change is adopted)	TBD