Proposal No. 2 7 - 2 4 8

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
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9. Proposal Subject	Employee Training Requirement Relocation
10. Specific NSSP Guide Reference	Section II Model Ordinance, Chapter X. General Requirements for Dealers, .04 Certification Requirements, A.(2)(c) Section II Model Ordinance; Chapter XI. Shucking and Packing, Chapter XII, Repacking of Shucked Shellfish, Chapter XIII. Shellstock Shipping, Chapter XIV. Reshipping, Chapter XV. Depuration; .03 Other Model Ordinance Requirements, H. Supervision
11. Text of Proposal/ Requested Action	Chapter X. General Requirements for Dealers .04 Certification Requirements A. General. (1) No person shall act as a dealer prior to obtaining certification. (2) Any person who wants to be a dealer shall: (a) Make application to the Authority for certification; (b) Have and implement a HACCP Plan, and have a program of sanitation monitoring and record keeping in compliance with 21 CFR 123 as it appears in the Federal Register of December 18, 1995, except for the requirement for harvester identification on a dealer's tag. ~~(c) Ensure that all individuals who manufacture, process, pack, or hold food obtain training in accordance with 21 CFR 117.4. A dealer shall be allowed thirty (30) days following initial hiring of a new employee to provide the required education.~~ ~~(i) Proof of training for all employees shall be presented to the Authority prior to certification, recertification, or licensing.~~ ~~(ii) The dealer shall maintain the record of the completed training.~~ Chapter XI. Shucking and Packing H. Supervision (4) The dealer shall require: (a) Supervisors to monitor employee hygiene practices, including handwashing, eating, and smoking at work stations, and storing personal items or clothing. [K] (b) Supervisors to assure that proper sanitary practices are implemented, including: (i) Plant and equipment clean-up; [K] (ii) Rapid product handling; and [K] (iii) Shellfish protection from contamination. [K] (c) Supervisors to not allow unauthorized persons in those portions of the facilities where shellfish are stored, handled, processed, or packaged or food handling equipment, utensils, and packaging materials are cleaned or stored. [K] (d) All employees who manufacture, process, pack, or hold food to ~~be~~obtain train~~ed~~ing in proper food handling and personal hygiene practices, in accordance with 21 CFR 117.4. [K] (i) A dealer shall be allowed thirty (30) days following initial hiring of a new employee to provide the required education. (ii) The dealer shall maintain the record of the completed training.

Chapter XII. Repacking of Shucked Shellfish

Chapter XIII. Shellstock Shipping
H. Supervision
(4) The dealer shall require:
(a) Supervisors to monitor employee hygiene practices, including handwashing, eating, and smoking at work stations, and storing personal items or clothing. [K]
(b) Supervisors to assure that proper sanitary practices are implemented, including:
(i) Plant and equipment clean-up; [K]
(ii) Rapid product handling; and [K]
(iii) Shellfish protection from contamination. [K]
(c) Supervisors to not allow unauthorized persons in those portions of the facilities where shellfish are stored, handled, processed, or packaged or food handling equipment, utensils, and packaging materials are cleaned or stored. [K]
(d) All employees who manufacture, process, pack, or hold food to ~~be~~obtain train~~ed~~ing in proper food handling and personal hygiene practices, in accordance with 21 CFR 117.4. [K]
(i) A dealer shall be allowed thirty (30) days following initial hiring of a new employee to provide the required education.
(ii) The dealer shall maintain the record of the completed training.

Chapter XIV. Reshipping
H. Supervision
(4) The dealer shall require:
(a) Supervisors to monitor employee hygiene practices, including handwashing, eating, and smoking at work stations, and storing personal items or clothing. [K]
(b) Supervisors to assure that proper sanitary practices are implemented, including:
(i) Plant and equipment clean-up; [K]
(ii) Rapid product handling; and [K]
(iii) Shellfish protection from contamination. [K]
(c) Supervisors to not allow unauthorized persons in those portions of the facilities where shellfish are stored, handled, processed, or packaged or food handling equipment, utensils, and packaging materials are cleaned or stored. [K]
(d) All employees who manufacture, process, pack, or hold food to ~~be~~obtain train~~ed~~ing in proper food handling and personal hygiene practices, in accordance with 21 CFR 117.4. [K]
(i) A dealer shall be allowed thirty (30) days following initial hiring of a new employee to provide the required education.
(ii) The dealer shall maintain the record of the completed training.

Chapter XV. Depuration
H. Supervision
(4) The dealer shall require:
(a) Supervisors to monitor employee hygiene practices, including handwashing, eating, and smoking at work stations, and storing personal items or clothing. [K]
(b) Supervisors to assure that proper sanitary practices are implemented, including:
(i) Plant and equipment clean-up; [K]
(ii) Rapid product handling; and [K]
(iii) Shellfish protection from contamination. [K]
(c) Supervisors to not allow unauthorized persons in those portions of the facilities where shellfish are stored, handled, processed, or packaged or food handling equipment, utensils, and packaging materials are cleaned or stored. [K]
(d) All employees who manufacture, process, pack, or hold food to ~~be~~obtain train~~ed~~ing in proper food handling and personal hygiene practices, in accordance with 21 CFR 117.4. [K]
(i) A dealer shall be allowed thirty (30) days following initial hiring of a new employee to provide the required education.
(ii) The dealer shall maintain the record of the completed training.

12. Public Health Significance	This proposal moves the existing requirement for employee training. When requirements for employee training were added to the Model Ordinance in 2017, they were added to the incorrect location, probably mistakenly. As a result of the misplacement, the record of the employee training can be checked only during certification inspections, resulting in the possible scenario an employee hired shortly after a recertification inspection then the training record for that employee not being able to be inspected for up to 11 months before the next certification inspection. By moving the existing requirement for employee training to the correct location, the record of employee training can be checked during all inspections, as was presumably intended when the requirement was originally added to the Model Ordinance.
13. Cost Information	None
14. Changes Needed to Guidance (if proposed change is adopted)	None