Proposal No. 2 7 - 2 4 9

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	Andrew Bell
3. Affiliation	State of Delaware, Department of Natural Resources & Environmental Control
4. Address Line 1	285 Beiser Boulevard
5. Address Line 2	Suite 102
6. City, State, Zip	Dover, DE 19904
7. Phone	302-608-5511
8. Email	andrew.bell@delaware.gov
9. Proposal Subject	Corrective Actions
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 .01 General HACCP Requirements C. Contents of the HACCP Plan. The HACCP plan shall, at a minimum: (5) Include ~~any~~ corrective action plans that have been developed in accordance with Section .01 F. (2), to be followed in response to deviations from critical limits at critical control points. F. Corrective Actions. (1) Whenever a deviation from a critical limit occurs, a dealer shall take corrective action either by: (a) Following a corrective action plan that is appropriate for the particular deviation, or (b) Following the procedures in Section .01 F. (3). (2) Dealers ~~may~~ shall develop written corrective action plans, which become part of their HACCP plans in accordance with Section .01 C. (5), by which they predetermine the corrective actions that they will take whenever there is a deviation from a critical limit. A corrective action plan that is appropriate for a particular deviation is one that describes the steps to be taken and assigns responsibility for taking those steps, to ensure that: (a) No product enters commerce that is either injurious to health or is otherwise adulterated as a result of the deviation; and (b) The cause of the deviation is corrected. ~~(3) When a deviation from a critical limit occurs and the dealer does not have a corrective action plan that is appropriate for that deviation, the dealer shall:~~ ~~(a) Segregate and hold the affected product until:~~ ~~(i) There is a review to determine the acceptability of the affected product for distribution. The review shall be performed by an individual or individuals who have adequate training or experience to perform such a review. Adequate training may or may not include training in accordance with Section .01 I.; and~~ ~~(ii) Corrective action is taken when necessary, to ensure that no product enters commerce that is either injurious to health or is otherwise adulterated as a result of the deviation.~~ ~~(b) Perform or obtain timely reassessment by an individual or individuals who have been trained in accordance with Section .01 I., to determine whether the HACCP plan needs to be modified to reduce the risk of recurrence of the deviation, and modify the HACCP plan as necessary.~~ (43) All corrective actions taken in accordance with this section shall be fully documented in records that are subject to verification in accordance with Section .01 G. and the record keeping requirements of Section .01 H.

12. Public Health Significance	A deviation from a HACCP plan critical limit represents a critical situation wherein shellfish product presents a threat to the health of the consumer. Currently, it is optional for dealers to include corrective action plans that identify the proper response taken in response to these critical situations. It is necessary for dealers to have pre-existing corrective action plans (which are typically as brief and simple as one or two sentences included in the corrective actions column of the HACCP plan) so that they are prepared to appropriately handle these critical situations in order to ensure that no injurious product reaches the consumer. It is better for dealers to have determined how to respond to critical limit deviations before they occur, than for dealers to have to segregate and hold product until the proper action is determined. It is reasonable and necessary for dealers to determine the proper corrective action (usually one-two sentences describing the disposition of the effected product) to take in response to the exceedance of each critical limit before it occurs, so that they have a basic plan to follow, rather than having to figure it out in the moment.
13. Cost Information	Minimal – the majority of dealers already include corrective action plans in their HACCP plans, and for the minority of dealers who do not, development of corrective action plans should not require much cost.
14. Changes Needed to Guidance (if proposed change is adopted)	The NSSP Standardized Shellfish Processing Plant Inspection Form would have to be updated to remove the words “if identified” from #2(h).