Proposal No. 2 7 - 2 5 3

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
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9. Proposal Subject	Exclusion of Pests
10. Specific NSSP Guide Reference	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, .02 Sanitation, H. Exclusion of Pests
11. Text of Proposal/ Requested Action	Chapter XI. Shucking and Packing H. Exclusion of Pests. The dealer shall operate his facility to assure that pests are excluded from the facility and processing activities. Animals shall not be allowed 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~~S$^{C/K}$] Chapter XII, Repacking of Shucked Shellfish H. Exclusion of Pests. The dealer shall operate his facility to assure that pests are excluded from the facility and processing activities. Animals shall not be allowed 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~~S$^{C/K}$] Chapter XIII. Shellstock Shipping H. Exclusion of Pests. The dealer shall operate his facility to assure that pests are excluded from the facility and processing activities. Animals shall not be allowed 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~~S$^{C/K}$] Chapter XIV. Reshipping H. Exclusion of Pests. The dealer shall operate his facility to assure that pests are excluded from the facility and processing activities. Animals shall not be allowed 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~~S$^{C/K}$] Chapter XV. Depuration H. Exclusion of Pests. The dealer shall operate his facility to assure that pests are excluded from the facility and processing activities. Animals shall not be allowed 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~~S$^{C/K}$]
12. Public Health Significance	Pest presence in a dealer facility is currently a Key deficiency but is more appropriately a Swing (Critical or Key) deficiency. Depending on severity and circumstances, pest presence ranges from meeting the definition of a Critical deficiency (defined as a condition which results in the production of a product that is unwholesome or presents a threat to the health or safety of the consumer) to meeting the definition of a Key deficiency (defined as a condition which may result in unwholesome product), therefore this item is more appropriately a Swing deficiency. The public health risk inherent in a pest problem matches the definition for a Swing deficiency of "depending upon the severity and circumstances".

	Whether the inspector assigns it as Critical or Key would be accomplished through the same means for all Swing deficiencies, by determining whether the pest problem meets the definition of a Critical deficiency or meets the definition of a Key deficiency, depending on the severity and circumstances. For example, the inspector would likely determine that ants or a moderate number of flies would be a Key, whereas an infestation of cockroaches or mice would likely be a Critical since it represents an imminent health hazard.
13. Cost Information	None
14. Changes Needed to Guidance (if proposed change is adopted)	None