Proposal No. 2 7 - 2 6 2

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	Alfred R. Sunseri
3. Affiliation	P&J Oyster Company, Inc.
4. Address Line 1	1039 Toulouse Street
5. Address Line 2	
6. City, State, Zip	New Orleans, LA 70112
7. Phone	504-722-9854
8. Email	asunseri@bellsouth.net
9. Proposal Subject	Remove SSA's exemptions for building requirements for shellstock shipper and reshipper certifications as listed at the beginning of Chapters XIII and XIV.
10. Specific NSSP Guide Reference	Chapters XIII and XIV.
11. Text of Proposal/ Requested Action	Remove the language at the beginning of Chapter XIII, "Exceptions. Shellstock Shippers are not required to comply with the building requirements in Sections .02 and .03 of this chapter when the Authority has determined that a shellstock shipper's practices and conditions do not warrant requiring a building." and remove the language at the beginning of Chapter XIV., "Exceptions. Reshippers are not required to comply with the building requirements in Sections .02 and .03 of this chapter when the Authority has determined that a reshipper's practices and conditions do not warrant requiring a building.".
12. Public Health Significance	All "on-shore" processing of shellstock that includes handling, sorting, sizing, washing, packing, labeling, or storing of shellfish in preparation for distribution, a certified building must be required to practice these activities in a safe and sanitary manner. Contamination can be caused by not using potable water, if rodent and vermin are not prevented from entering the processing area, if processing surfaces are not sanitized before processing of shellstock nor after processing ends, if light-colored walls can not be easily cleaned and if doors do not separate the outdoors to the processing area to maintain a sanitary work area. Time-temperature controls must be maintained following harvest of shellstock and before shellstock is being culled, sized, sorted, washed, packaged, and labeled following landing onshore. Also, it takes a significant amount of time and many times more than 2 hours from harvesting until all shellstock has been completely processed to enter commerce. If the processed culled and sorted shellstock is being returned to the growing area, no shellfish is allowed to be harvested from that growing area for 2 weeks because that shellfish has been temperature abused so that contaminant levels of poisonous or deleterious substances in shellstock do not exceed FDA action levels, tolerances and/or guidance levels and/or levels that are deemed safe through risk evaluations.

13. Cost Information	N/A
14. Changes Needed to Guidance (if proposed change is adopted)	yes