Proposal No. 2 3 - 3 0 5

Proposal for Task Force Consideration at the ISSC 2027 Biennial Meeting	1. a. ☐ Growing Area b. ☐ Harvesting/Handling/Distribution c. X Administrative

Submitter	ISSC Executive Office
Email	issc@issc.org
Proposal Subject	Biotoxin Management Plan Criteria
Specific NSSP Guide Reference	Section II Model Ordinance; Chapter IV. Shellstock Growing Areas @.04.B
Text of Proposal/ Requested Action	Section II Model Ordinance; Chapter IV. Shellstock Growing Areas @.04.B. B. Marine Biotoxin Management Plan. In those areas that have been implicated in an illness outbreak or where toxin- producing phytoplankton have been documented to occur, the toxins are prone to accumulate in shellfish and during times when marine biotoxins are likely to occur, representative samples of water and/or shellfish shall be collected during harvest periods in accordance with one (1) or a combination of the marine biotoxin management strategies listed below in (4). and in accordance with Section IV. Guidance Documents Chapter II Growing Areas .02 Guidance for Developing Marine Biotoxin Plans. (1) The Authority shall develop and adopt a marine biotoxin management plan for all marine and estuarine shellfish growing areas if there is a history of biotoxin closures related to PSP, ASP, NSP, DSP and/or AZP; if toxin-producing phytoplankton have been documented to occur in the growing area; or a reasonable likelihood that biotoxin closures could occur. (2) The plan shall define the administrative procedures and resources necessary to accomplish the following: (a) Maintain a toxin-producing phytoplankton and/or shellfish sampling program as described below in (4). It is necessary to recognize that different marine biotoxin management strategies are essential to address specific risks as well as geographic and logistical conditions. Marine biotoxin management strategies must include an appropriate number of samples to adequately address the specific risks. Specific criteria are cited in ~~Section IV. Guidance Documents Chapter II Growing Areas .02 Guidance for Developing Marine Biotoxin Plans~~Section 4 Marine Biotoxin Management Strategies. (b) Close growing areas and embargo shellfish; (c) Prevent harvesting of contaminated species; (d) Provide for product recall; (e) Disseminate information on the occurrences of toxic algal blooms and/or toxicity in shellfish meats to adjacent States, shellfish industry, and local health agencies; (f) Coordinate control actions taken by Authorities and Federal agencies;

(g) Establish reopening criteria; and

Ensure that all shellfish harvested from growing areas or portion(s) of growing areas placed in the controlled access status meets all conditions of harvest restrictions prior to being placed in distribution. This would include all sampling, testing or product holds.

(3) The Authority may use precautionary closures based on shellfish toxicity screening or phytoplankton sample results as defined in their marine biotoxin management plan. Precautionary closures may be lifted immediately:

(a) if confirmatory testing using an approved method shows the level of biotoxin present in shellfish meats is not equal to or above established criteria as described below in C; or

(b) when shellfish toxicity screening or phytoplankton sample results indicate that the precautionary closure was not necessary.

(4) Marine biotoxin management strategies are as follows:

(a) Phytoplankton monitoring: this strategy involves a routine program for sampling growing area waters for the presence of phytoplankton species known or suspected to produce marine biotoxins. This is a complementary management strategy that enhances predictive capabilities of anticipating toxicity in shellfish and must be used in combination with other management strategies. ~~Specific criteria are cited in Section IV. Guidance Documents Chapter II Growing Areas .02 Guidance for Developing Marine Biotoxin Plans.~~

The marine biotoxin management plan that incorporates this strategy must establish:

- appropriate screening levels,
- appropriate methods,
- appropriate laboratory(s)/analyst(s),
- an appropriate sampling plan,
- appropriate sample locations (stations),
- appropriate sampling frequency; and
- a sufficient dataset to support management decisions.

The phytoplankton monitoring strategy shall be used together with one (1) or more of the other biotoxin management strategies. If it were used as the sole management strategy, phytoplankton monitoring would likely misrepresent the actual risk of marine biotoxins. Cell counts, as measured per liter of water, are often used to trigger additional testing of shellfish in biotoxin monitoring programs. These cell count criteria can only be established with a robust dataset; therefore, new monitoring programs should employ low cell count criteria to trigger shellfish toxicity samples to establish or refine the cell concentrations responsible for toxins accumulating in shellfish.

(b) Routine shellfish toxicity onitoring: this strategy involves a routine program for sampling and testing shellfish meats for the presence of marine biotoxins. nless species specific shellfish

testing is conducted, the highest risk species shall be used. This strategy may be used in combination with other management strategies. ~~Specific criteria are cited in Section IV. Guidance Documents Chapter II Growing Areas .02 Guidance for Developing Marine Biotoxin Plans.~~
The level of monitoring required will vary based on the historical database available to inform the sampling strategy (i.e., growing areas with a long history of defined temporal and spatial patterns of shellfish toxicity may have a more targeted approach to sampling, requiring less monitoring than for growing areas where temporal and spatial patterns have not been determined). A dataset with at least 36 samples per growing area or hydrographically linked waterbodies across representative environmental conditions for a span of at least three (3) years shall be developed before the biotoxin monitoring plan may be modified. Until the Authority is confident they understand the risk posed by marine biotoxins in the growing area, sampling should be as robust as possible, and managers should consider that harmful algal blooms can change dramatically from year to year.

The marine biotoxin management plan that incorporates this strategy must establish:

- appropriate screening levels,
- appropriate methods,
- appropriate laboratory(s)/analyst(s),
- an appropriate sampling plan,
- appropriate sample locations (stations),
- appropriate sampling frequency; and
- a sufficient dataset to support management decisions.

Analytical methods used in this strategy shall be in accordance with Section IV. Guidance Documents Chapter II Growing Areas .14 or Section II. Chapter III.@02C.

(c) Pre-harvest shellfish toxicity testing: this strategy involves sampling and testing shellfish meats for the presence of marine biotoxins in the intended harvest area specifically in advance of harvest. This strategy, if used independent of any other strategy, shall permit harvest for a short period of time following testing. This strategy may be used in combination with other management strategies. ~~Specific criteria are cited in Section IV. Guidance Documents Chapter II Growing Areas .02 Guidance for Developing Marine Biotoxin Plans.~~
This strategy requires representative samples that cover the spatial distribution of the area to be harvested. The duration of permitted harvest following sampling will vary based on the species being tested and the historical database available to inform the sampling strategy. A dataset with at least 36 samples per harvest area shall be developed before the biotoxin

monitoring plan may be modified. Without at least 36 samples per harvest area over the span of at least three (3) years, the short duration of permitted harvest shall not exceed three (3) days from the time of shellfish collection for toxicity testing to harvest. The dataset could then be used to modify the duration of permitted harvest.

This management strategy can be applied to harvest areas where collecting, transporting and processing shellfish samples is feasible. This management strategy can be applied to aquaculture or wild harvest. Appropriate venues for this management strategy include but are not limited to; easily accessible and remote wild harvest areas and aquaculture sites in state and federal waters. If toxicity in excess of the established threshold in Section II. Chapter IV. @.04 C. is detected, the growing area must be either be placed in the closed or controlled access status.

The marine biotoxin management plan that incorporates this strategy must establish:

- appropriate screening levels,
- appropriate methods,
- appropriate laboratory(s)/analyst(s),
- an appropriate sampling plan,
- appropriate sampling frequency,
- a defined harvest area, and;
- appropriate duration for permitted harvesting subsequent to sampling.

This strategy is specifically for permitting harvest following shellfish testing. The duration of permitted harvesting will depend on the species being tested, the risk of increasing toxicity and the timing of additional sampling. Samples must be representative of the harvest area.

Methods shall be used in accordance with Section IV. Guidance Documents Chapter II Growing Areas .14 or Section II. Chapter III. @.02 C.

(d) Shellfish lot testing: this strategy involves sampling and testing shellfish meats for the presence of marine biotoxins on a lot basis after harvest. This strategy may be combined with a pre-harvest shellfish toxicity testing strategy, the results of which permit harvest. ~~Specific criteria are cited in Section IV. Guidance Documents Chapter II Growing Areas .02 Guidance for Developing Marine Biotoxin Plans.~~ Lot testing may also be used on a case by case basis to clear product harvested immediately prior to a biotoxin closure if the Authority determines it is necessary.

This strategy requires representative samples for each lot of harvested shellstock. Lot testing shall be permitted in growing areas in the Controlled Access Status and require Restricted Shellstock tags. The conditions for the area in Controlled

Access Status shall be defined in the harvest permit and may include holding shellstock until lot tests are available. A dataset with at least 36 samples per harvest area over the span of at least three (3) years shall be developed before the biotoxin monitoring plan may be modified.
The marine biotoxin management plan that incorporates this strategy must establish:

- appropriate screening levels,
- appropriate methods,
- appropriate laboratory(s)/analyst(s),
- an appropriate sampling plan,
- appropriate sampling frequency, and;
- representative number of samples per lot.

Methods shall be used in accordance with Section IV. Guidance Documents Chapter II Growing Areas.14 or Section II. Chapter III. @.02 C.

(e) Pre-harvest shellfish toxicity screening and lot testing: this strategy requires pre-harvest shellfish toxicity screening of the intended harvest area coupled with shellfish lot testing upon landing or receipt at the initial dealer. ~~Specific criteria are cited in Section IV. Guidance Documents Chapter II Growing Areas .02 Guidance for Developing Marine BiotoxinPlans. (5)~~ The marine biotoxin management plan shall include agreements or memoranda of understanding, between the Authority and individual shellfish harvesters, individual growers or individual shellfish dealers, to allow harvesting in a growing area that is placed in the controlled access status. Such harvesting shall be conducted with strict assurances of safety and in accordance with the marine biotoxin management strategies listed in (4).
This strategy shall permit harvest from intended harvest areas in the Controlled Access Status and require Restricted Shellstock tags. The conditions for the area in Controlled Access Status shall be defined in the harvest permit and may include holding shellstock until lot tests results are available. A dataset with at least 36 samples taken monthly per harvest area spanning at least three (3) years shall be developed before the biotoxin monitoring plan may be modified. In the absence of an adequate dataset, the initial number and frequency of pre-harvest and lot samples must be sufficient to conduct an evaluation of risk in the intended harvest area. The initial number of samples must be adequate to address the size of the intended harvest area and the amount of shellfish harvested. Single samples are not adequate for evaluation of risk. Should initial samples indicate minimal toxin levels or the absence of toxins, sampling can be reduced but must be conducted at least monthly or as often as necessary to monitor risk.

The marine biotoxin management plan that incorporates this strategy must establish:

- appropriate screening levels,
- appropriate methods,
- appropriate laboratory(s)/analyst(s),
- an appropriate sampling plan,
- appropriate sampling frequency,
- a defined harvest area, and;
- representative number of samples.

Methods shall be used in accordance with Section IV. Guidance Documents Chapter II Growing Areas.14 or Section II. Chapter III. @.02 C.

Section IV Guidance Documents; Chapter II Growing Areas .02

Marine Biotoxin Management Strategies

It is necessary to recognize that different marine biotoxin management strategies are essential to address specific risks as well as geographic and logistical conditions. Marine biotoxin management strategies must include an appropriate number of samples to adequately address the specific risks. The Authority initiating biotoxin management plans should employ sampling in accordance with the strategies below until a baseline dataset of at least 36 samples per growing area or hydrographically linked waterbodies is developed. These samples should cover representative environmental conditions and a time span of at least three (3) years. Once this dataset is developed, the Authority may consider modifying sample numbers and frequency in the marine biotoxin management plan in accordance with the strategies below.

A. Phytoplankton monitoring: this strategy involves a routine program for sampling growing area waters for the presence of phytoplankton species documented or suspected to produce marine biotoxins. This complementary management strategy that enhances predictive capabilities of anticipating toxicity in shellfish must be used in combination with other management strategies. The level of monitoring required will vary based on the historical database available to inform the sampling strategy (i.e., growing areas with a long history of defined temporal and spatial patterns of toxin-producing phytoplankton may have a more targeted approach to sampling, requiring less monitoring than for growing areas where temporal and spatial patterns have not been determined). A dataset with at least 36 samples per growing area or hydrographically linked waterbodies for a time span of at least three (3) years of phytoplankton counts, comparing with the onset of shellfish toxicity when toxic phytoplankton are present, should be developed before the biotoxin monitoring plan may be modified.

Phytoplankton monitoring can be applied to all growing areas where collecting, transporting and processing water samples is logistically feasible, taking into consideration effects of zooplankton grazing and durability of various cell types to temperature and transport. This

management strategy may be applied to aquaculture or wild harvest. Appropriate venues for this management strategy include but are not limited to; easily accessible wild harvest areas and aquaculture sites in state waters or aquaculture sites in federal waters.

~~The marine biotoxin management plan that incorporates this strategy must establish:~~

- ~~appropriate screening levels,~~
- ~~appropriate methods,~~
- ~~appropriate laboratory(s)/analyst(s),~~
- ~~an appropriate sampling plan,~~
- ~~appropriate sample locations (stations),~~
- ~~appropriate sampling frequency; and~~
- ~~a sufficient dataset to support management decisions.~~

- ~~The phytoplankton monitoring strategy shall be used together with one (1) or more of the other biotoxin management strategies. If it were used as the sole management strategy, phytoplankton monitoring would likely misrepresent the actual risk of marine biotoxins. Cell counts, as measured per liter of water, are often used to trigger additional testing of shellfish in biotoxin monitoring programs. These cell count criteria can only be established with a robust dataset; therefore, new monitoring programs should employ low cell count criteria to trigger shellfish toxicity samples to establish or refine the cell concentrations responsible for toxins accumulating in shellfish.~~

When an early warning system such as phytoplankton monitoring detects increased toxicity/cell counts or other information suggests that toxin levels are increasing, it is important that the Authority have procedures to promptly expand sampling to additional stations and/or increase the frequency of sampling for marine biotoxins. The procedures should include plans for obtaining the additional resources necessary to implement the expanded sampling and laboratory analysis program. If a plan consists of water sampling for phytoplankton cell counts as surveillance, the Authority should identify its plan to be able to initiate shellfish sampling.

Considerations should be made for how sampling is conducted such as phytoplankton net tows, filtered surface water, or whole water samples. The depth of water sampled should also be considered and evaluated for all species of phytoplankton being targeted. Some species of phytoplankton are known to display diurnal, vertical migration patterns within the water column, while other species are known to occur in dense patches.

Laboratory and field methods may include, but are not limited to light microscopy, flowcytometry, DNA fingerprinting, rapid toxin detection tests, and PCR assays. Analysts should be trained in each method employed and consideration should be given to complimentary methods of analysis such as light microscopy with phytoplankton identification confirmed by a rapid test at least in the initial phases of the monitoring program.

An appropriate sampling plan, station location, and sampling frequency

should all factor in the location and type of the resource being monitored, the species of phytoplankton anticipated or observed, and the environmental conditions that might result in a rapid bloom or trigger the production of toxicity in an existing population. Primary sampling stations (also referred to as indicator or sentinel stations) should be located at sites where toxic phytoplankton are most likely to first appear, based either on experience or knowledge of site conditions. The geographic distribution for collection of samples should take into consideration the randomness of toxic algal blooms. Establishing the frequency and period for collection of samples to identify an event as early as possible is an important consideration. Historical occurrences and fluctuations in coastal phytoplankton populations due to the influence of meteorological and hydrographic events are also significant. For example, a large rain storm may cause nutrient loading in coastal waters and trigger a toxic phytoplankton bloom, or a hurricane may drive an offshore phytoplankton bloom onshore. To facilitate knowledge transfer, it is advisable that the authority describe its rationale in selecting sampling sites.

B. Routine shellfish toxicity monitoring: this strategy involves a routine program for sampling and testing shellfish meats for the presence of marine biotoxins. Unless species-specific shellfish testing is conducted, the highest risk species (e.g. species that metabolizes toxin most quickly) occurring in the growing area shall be used. Many biotoxin monitoring programs have found mussels to be the best sentinel species. This strategy may be used alone or in combination with other management strategies.
~~The level of monitoring required will vary based on the historical database available to inform the sampling strategy (i.e., growing areas with a long history of defined temporal and spatial patterns of shellfish toxicity may have a more targeted approach to sampling, requiring less monitoring than for growing areas where temporal and spatial patterns have not been determined). A dataset with at least 36 samples per growing area or hydrographically linked waterbodies across representative environmental conditions for a span of at least three (3) years shall be developed before the biotoxin monitoring plan may be modified. Until the Authority is confident they understand the risk posed by marine biotoxins in the growing area, sampling should be as robust as possible, and managers should consider that harmful algal blooms can change dramatically from year to year.~~

This management strategy can be applied to all growing areas where collecting, transporting and processing shellfish samples is feasible. This management strategy can be applied to aquaculture or wild harvest. Appropriate venues for this management strategy include but are not limited to, easily accessible wild harvest areas and aquaculture sites in state waters or wild harvest areas and aquaculture sites in federal waters.

~~The marine biotoxin management plan that incorporates this strategy must establish:~~
- ~~appropriate screening levels,~~
- ~~appropriate methods,~~

	~~• appropriate laboratory(s)/analyst(s),~~ ~~• an appropriate sampling plan,~~ ~~• appropriate sample locations (stations),~~ ~~• appropriate sampling frequency; and~~ ~~• a sufficient dataset to support management decisions.~~ • The routine shellfish toxicity monitoring strategy may be used independently or together with one (1) or more of the other biotoxin management strategies. If used as the sole management strategy, predicting future toxicity levels in shellfish and the appropriate sampling frequency can be difficult. Long-term databases can provide valuable historic information on the timing of toxicity occurring in shellfish as well as toxicity elimination from shellfish. Shellfish toxin levels that are below the regulatory levels may trigger emergency or expanded testing, or precautionary closures. Growing areas should be placed in the closed status at a level that provides an adequate margin of safety, since in many instances, toxicity levels will change rapidly and the time between sampling and results should be considered. Precautionary closures can be made to prevent the harvest of potentially toxic shellfish while sample results are being collected and processed. Consideration should be given to the different species of shellfish present in a growing area, the intensity and duration of harmful algal blooms and the uptake and elimination rates of specific toxins from all species of shellfish harvested from the growing areas (e.g., sea scallops). Methods shall be used in accordance with Section IV. Guidance Documents Chapter II Growing Areas.14 or Section II. Chapter III. @.02 C. Additionally, the Authority should identify laboratories that can perform approved methods for marine biotoxins and identify laboratory capacity. An appropriate sampling plan, station location and sampling frequency should factor in the location and type of the resource being monitored, the species of shellfish harvested in the growing area and environmental conditions that might affect toxin uptake, such as water temperatures. Primary sampling stations (also referred to as indicator or sentinel stations) should be located at sites where toxin is most likely to first appear, based either on past experience or knowledge of site conditions. The geographic distribution for collection of samples should take into consideration the randomness of toxic algal blooms. Establishing the frequency and period for collection of samples to identify an event as early as possible is an important consideration. Sample collection, sample transportation, and sample analysis procedures should be developed, and predictable timeframes established between collection and results. The Authority should ensure that in an emergency, such as a suspected biotoxin illness, the normal timeframe can be compressed, and sample results known as quickly as possible. It is important to consider emergency coverage schedules for staff and lab availability outside of normal office hours during harmful algal bloom events.

When an early warning system detects increased toxicity/cell counts or other information suggests that toxin levels are increasing, it is important that the Authority have procedures to promptly expand sampling to additional stations and/or increase the frequency of sampling for marine biotoxins. The procedures should include plans for obtaining the additional resources necessary to implement the expanded sampling and laboratory analysis program.

C. Pre-harvest shellfish toxicity testing: this strategy involves sampling and testing shellfish meats for the presence of marine biotoxins in the intended harvest area specifically in advance of harvesting. This strategy, if used independent of any other strategy, shall permit harvest in specific geographic locations and for short durations. This strategy may also be used in combination with other management strategies and should be considered as a complementary strategy while developing datasets for alternative management strategies (e.g. pre-harvest shellfish toxicity testing in combination with phytoplankton monitoring which can evolve into a robust shellfish toxicity monitoring strategy).

~~This strategy requires representative samples that cover the spatial distribution of the area to be harvested. The duration of permitted harvest following sampling will vary based on the species being tested and the historical database available to inform the sampling strategy. A dataset with at least 36 samples per harvest area shall be developed before the biotoxin monitoring plan may be modified. Without at least 36 samples per harvest area over the span of at least three (3) years, the short duration of permitted harvest shall not exceed three (3) days from the time of shellfish collection for toxicity testing to harvest. The dataset could then be used to modify the duration of permitted harvest.~~

~~This management strategy can be applied to harvest areas where collecting, transporting and processing shellfish samples is feasible. This management strategy can be applied to aquaculture or wild harvest. Appropriate venues for this management strategy include but are not limited to; easily accessible and remote wild harvest areas and aquaculture sites in state and federal waters. If toxicity in excess of the established threshold in Section II. Chapter IV. @.04 C. is detected, the growing area must be either be placed in the closed or controlled access status.~~

~~The marine biotoxin management plan that incorporates this strategy must establish:~~

- ~~appropriate screening levels,~~
- ~~appropriate methods,~~
- ~~appropriate laboratory(s)/analyst(s),~~
- ~~an appropriate sampling plan,~~
- ~~appropriate sampling frequency,~~
- ~~a defined harvest area, and;~~
- ~~appropriate duration for permitted harvesting subsequent to sampling.~~

~~This strategy is specifically for permitting harvest following shellfish~~

~~testing. The duration of permitted harvesting will depend on the species being tested, the risk of increasing toxicity and the timing of additional sampling. Samples must be representative of the harvest area.~~

~~Methods shall be used in accordance with Section IV. Guidance Documents Chapter II Growing Areas .14 or Section II. Chapter III. @.02 C.~~

D. Shellfish lot testing: this strategy involves sampling and testing shellfish meats for the presence of marine biotoxins on a lot basis after harvest. This strategy may be combined with a pre-harvest shellfish toxicity testing strategy, the results of which permit harvest. Lot testing may also be used on a case by case basis to clear product harvested immediately prior to a biotoxin closure if the Authority determines it is necessary.

~~This strategy requires representative samples for each lot of harvested shellstock. Lot testing shall be permitted in growing areas in the Controlled Access Status and require Restricted Shellstock tags. The conditions for the area in Controlled Access Status shall be defined in the harvest permit and may include holding shellstock until lot tests are available. A dataset with at least 36 samples per harvest area over the span of at least three (3) years shall be developed before the biotoxin monitoring plan may be modified.~~

This management strategy can be applied to all growing areas where harvest occurs. This management strategy can be applied to aquaculture or wild harvest. Appropriate venues for this management strategy include but are not limited to; easily accessible and remote wild harvest areas and aquaculture sites in state and federal waters.

~~The marine biotoxin management plan that incorporates this strategy must establish:~~

- ~~appropriate screening levels,~~
- ~~appropriate methods,~~
- ~~appropriate laboratory(s)/analyst(s),~~
- ~~an appropriate sampling plan,~~
- ~~appropriate sampling frequency, and;~~
- ~~representative number of samples per lot.~~

~~Methods shall be used in accordance with Section IV. Guidance Documents Chapter II Growing Areas.14 or Section II. Chapter III. @.02 C.~~

E. Pre-harvest shellfish toxicity screening and lot testing: this strategy requires pre-harvest shellfish toxicity screening of the intended harvest area coupled with shellfish lot testing upon landing or receipt at the initial certified dealer.

~~This strategy shall permit harvest from intended harvest areas in the Controlled Access Status and require Restricted Shellstock tags. The conditions for the area in Controlled Access Status shall be defined in the~~

	~~harvest permit and may include holding shellstock until lot tests results are available. A dataset with at least 36 samples taken monthly per harvest area spanning at least three (3) years shall be developed before the biotoxin monitoring plan may be modified. In the absence of an adequate dataset, the initial number and frequency of pre-harvest and lot samples must be sufficient to conduct an evaluation of risk in the intended harvest area. The initial number of samples must be adequate to address the size of the intended harvest area and the amount of shellfish harvested. Single samples are not adequate for evaluation of risk. Should initial samples indicate minimal toxin levels or the absence of toxins, sampling can be reduced but must be conducted at least monthly or as often as necessary to monitor risk.~~ This management strategy can be applied to all growing areas where harvest occurs. This management strategy can be applied to aquaculture or wild harvest. Appropriate venues for this management strategy include but are not limited to; easily accessible and remote wild harvest areas and aquaculture sites in state and federal waters. ~~The marine biotoxin management plan that incorporates this strategy must establish:~~ • ~~appropriate screening levels,~~ • ~~appropriate methods,~~ • ~~appropriate laboratory(s)/analyst(s),~~ • ~~an appropriate sampling plan,~~ • ~~appropriate sampling frequency,~~ • ~~a defined harvest area, and;~~ ~~representative number of samples.~~ ~~Methods shall be used in accordance with Section IV. Guidance Documents Chapter II Growing Areas.14 or Section II. Chapter III. @.02 C.~~
Public Health Significance	Several sections of Chapter IV of the Model Ordinance refer to language in Section IV Guidance Documents that indicate that the guidance is mandatory. This proposal moves these criteria and strategies for Biotoxin Management from Guidance to Chapter IV of the Model Ordinance to clarify what are minimum requirements for NSSP compliance versus suggested options.
Cost Information	N/A
Action by 2023 Task Force III	Recommended referral of Proposal 23-305 to an appropriate Committee or Committees as determined by the Conference Chair.
Action by 2023 General Assembly	Adopted recommendation of Task Force III on Proposal 23-305.
Action by FDA July 7, 2023	Concurred with Conference action on Proposal 23-305.

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