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CHARLES H. BRONSON, COMMISSIONER OF AGRICULTURE

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Special Issue: Interstate Shellfish Sanitation Conference

This issue of *Florida Aquaculture* is devoted to describing the Interstate Shellfish Sanitation Conference (ISSC). We will clarify: 1) what it is and how it functions, 2) its relationship with the U.S Food and Drug Administration, state shellfish programs, and shellfish producers, 3) the National Shellfish Sanitation Program (NSSP) Guide for the Control of Molluscan Shellfish, and 4) how farmers, harvesters, and processors can become involved.

All consumers everywhere are demanding safe, nutritious food. Increased public concerns driven by international terrorism, new food technologies and the increase of harmful diseases continue to shake consumer confidence. The production of quality shellfish begins on the water and continues through safe shellfish handling practices until a satisfied consumer enjoys a tasty clam, oyster, scallop, or mussel and wants to buy another one to enjoy again.

Shellfish safety is a shared and equal responsibility of the farmer, harvester, certified shellfish house, seafood wholesaler, retailer, restaurateur, and shellfish sanitation agency.

This issue immediately precedes the 2003 ISSC Biennial Meeting in Portland, Oregon, August 2-8. To encourage meeting attendance, Ken Moore, ISSC Executive Director, recently wrote: "In recent years the ISSC has made significant progress in addressing critical issues such as vibrios, incorporation of Hazard Analysis and Critical Control Point (HACCP), and standardization of shellfish processing plant inspections. Continued improvement in the NSSP requires that the ISSC identify and address key public health issues to ensure that molluscan shellfish are safe for human consumption. The ability of the organization to accomplish the necessary program changes is dependent upon the collective effort of the ISSC membership."

For additional information regarding the ISSC, Florida's shellfish management program, industry input to the ISSC or the NSSP Guide, contact: Sherman Wilhelm, Division Director, Aquaculture, and David Heil, Bureau Chief, Aquaculture Environmental Services, at 850-488-4033, or Dan Leonard, ISSC Industry Executive Board Member Region 4 and owner Bull Bay Clam Farm, at 941-473-3292. Much of the information for this newsletter came from the ISSC's comprehensive web site <http://www.issc.org>.

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A History of Safety

During the winter of 1924 a typhoid fever outbreak, with cases in New York, Chicago, and Washington, D.C., was traced to sewage contaminated oysters. In response, local and state public health officials, and the shellfish industry asked the Surgeon General of the United States Public Health Service to develop control measures to ensure a safe shellfish supply.

The Surgeon General convened a conference of representatives from state and municipal health authorities, state conservation commissions, the Public Health Service and its Bureau of Chemistry (later to become the Food and Drug Administration), the Bureau of Commercial Fisheries (now National Marine Fisheries Service) and the shellfish industry. This historic conference was held in Washington, D.C. on February 19, 1925 and resulted in the adoption of a National Shellfish Sanitation Program (NSSP). The guidelines of the program have evolved into the NSSP Handbook which is managed and updated by the Interstate Shellfish Sanitation Conference (ISSC).

Since its inception the NSSP moved beyond its original 1925 objective that shellfish shipped for interstate commerce is safe for human consumption. In the 1940's, paralytic shellfish poison became a matter of public health concern and requirements were added to address this hazard. In 1957, it was determined that shellfish could concentrate certain radionuclides and procedures were revised to include controls for these pollutants. In the 1960's and 1970's, the program was again revised to address heavy metals and pesticides.

In 1975, the FDA proposed the creation of federal regulations in place of the NSSP. Ten years of intense discussion followed this announcement. After evaluating the comments, the FDA determined that federal regulations would unlikely achieve NSSP goals.

In March, 1984, the FDA entered into a Memorandum of Understanding (MOU) with the ISSC. The MOU formalized the FDA-ISSC relationship and established the ISSC as a federal-state-industry cooperative body. The formation of the ISSC also brought about uniformity and reciprocity to NSSP enforcement. States were enforcing the NSSP differently, which led some states to threaten refusal of shellfish from other states. The ISSC provides the forum to resolve these differences.

The demand for shellfish as a food source has increased as pristine areas, suitable for shellfish production, are being diminished by coastal development. Keeping pace with rapid environmental and market changes is a constant challenge for the ISSC. Dialogue by state and federal agencies, the shellfish industry, and academic interests is essential to insure the continued availability of safe and healthy shellfish products.

Mission: Comprehensive Safety

The Interstate Shellfish Sanitation Conference (ISSC) strives to foster and promote shellfish sanitation through the cooperation of state and federal control agencies, the shellfish industry, and the academic community. To accomplish these objectives the ISSC:

- Adopts uniform procedures incorporated into an Interstate Shellfish Sanitation Program implemented by all shellfish control agencies;
- Gives state shellfish programs current and comprehensive sanitation guidelines to regulate the harvesting, processing, and shipping of shellfish;
- Provides a forum for shellfish control agencies, the shellfish industry, and academic community to resolve major issues concerning shellfish sanitation;
- Informs all interested parties of recent developments in shellfish sanitation and other major issues of concern through the use of news media, publications, regional and national meetings, internet, and by working closely with academic institutions and trade associations.

The ISSC promotes cooperation and trust among shellfish control agencies, the shellfish industry, and insures the safety of shellfish products consumed in the United States.

Committees Address Complex Issues: Admin thru *Vibrio*

Complex issues are referred to committees for thorough review, discussion and resolution. The ISSC has a committee for every important shellfish topic: ISSC Administration, Biotoxin, Communication, Depuration/Wet Storage, Education, Foreign Relations, Growing Area Classification, Import Assessment, Labeling, Laboratory Methods, Laboratory Quality Assurance, Microbiology, NSSP Evaluation Criteria, Patrol, Plant Standardization, Post-Harvest Processing, Processing and Handling, Research Guidance, Shellfish Nomenclature, Shellfish Restoration, Time/Temperature, and *Vibrio* Management. The *Vibrio* Committee also has four subcommittees: Record Keeping, *Vibrio vulnificus*, *Vibrio parahaemolyticus*, and *Vibrio vulnificus* Education.

The Nuts and Bolts of the ISSC

Anyone interested in shellfish sanitation is encouraged to participate in the ISSC. The Conference holds a biennial meeting, attended by representatives of state shellfish control agencies from both producing and non-producing states, federal agencies, industry, and academic institutions.

An Executive Board handles the internal functions of the Conference. Membership of the ISSC Executive Board include six representatives from state shellfish control agencies from producing states, six industry members from shellfish producing states, one representative from a non-producing state shellfish control agency, one shellfish industry representative from a non-producing state, one member each from the U.S. Food and Drug Administration, the National Marine Fisheries Service, and the U.S. Environmental Protection Agency, and a number of non-voting representatives from a wide variety of entities.

The three ISSC task forces are: Growing Areas, Processing and Distribution, and Administration. The task forces review issues submitted to the Conference and prepare recommendations for consideration by the Conference's voting delegates. Committees are often appointed to assist task forces in developing recommendations. Task force members consist of equal numbers of state agency personal and members of the shellfish industry.

Task force recommendations are approved, disapproved or referred to a committee for further review by the general assembly composed of agency delegates from each state. Please note that the general assembly cannot amend a task force recommendation. However, the FDA has final veto authority over issues that the ISSC approves.

The biennial meeting focuses on issues of importance to shellfish sanitation. Issues for Conference consideration are submitted to the Program Chairman 90 days prior to the annual meeting. All new issues are mailed to Conference membership for review prior to the annual meeting.

Florida Represented by Two Agencies

Florida's vote on the ISSC Executive Board is split between the Department of Agriculture and Consumer Services and the Fish and Wildlife Conservation Commission. The split vote is based upon respective responsibilities: Agriculture carries out shellfish harvest area classification and shellfish processing plant inspection. The Commission provides harvesting and sales enforcement.

Florida's commitment to the ISSC has included an ISSC presidency by David Heil during 1998-99 and a series of EPA grants with the ISSC and the Florida Department of Health that have resulted in innovative *Vibrio vulnificus* educational materials for health care professionals.

The Name May Change But the Goal is the Same: SAFETY!

Throughout the NSSP's 78 year history, the FDA, state regulatory officials and the industry have worked diligently to establish uniform national guidelines for shellfish sanitation and safety. The guiding principles created in 1925 as the National Shellfish Sanitation Program evolved to a broader Interstate Shellfish Sanitation Program (ISSP) and work has been ongoing to refine a Model Ordinance to acknowledge dynamic changes in food technology, the environment and the public's desire for safer food.

The Ordinance describes the principles and requirements for the sanitary control of: 1) shellfish harvesting areas, harvest, processing and distribution, and 2) preparation of state shellfish laws and regulations. The Ordinance is also used by FDA as the basis for evaluating state and foreign shellfish sanitation programs.

To approve foreign imports, FDA seeks to establish international Memorandum of Understandings (MOU) with official agencies in countries that wish to export shellfish to the United States. MOUs are established after the foreign government demonstrates to FDA that their laws or regulations are equivalent to those published in the Manual, and that the foreign program is supported by trained personnel, laboratory facilities, and other resources as may be necessary to exercise control over exported shellfish. Once a country has an effective MOU, the shellfish control authority submits certificates of their certified shellfish dealers to the FDA. The FDA publishes the names of these certified shellfish shippers in the Interstate Certified Shellfish Shippers List as an approved source of shellfish.

One of the foremost and continuing ISSC goals has been the adoption of a Model Ordinance which would embody the principles and requirements of the NSSP. Adoption of the Model Ordinance by each member state implies a commitment to provide the necessary legal authority and resources to implement these regulatory requirements. Adoption ensures uniformity across state boundaries and enhances public confidence in shellfish products.

ISSC 2003 Issues Impacting Florida

The ISSC 2003 Biennial meeting in Oregon is packed with issues that require action by the members. The three task forces have moved forward numerous issues: Task Force I, Growing Areas, 23 issues; Task Force II, Processing and Distribution, 34 issues; and Task Force III, Administration, 19 issues. Select issues have been highlighted that may impact Florida:

- State of California's emergency regulation banning raw oysters from the Gulf of Mexico between April and October unless they have been subjected to post-harvest treatment to eliminate *Vibrio vulnificus* bacteria.
Executive Board item (Task Forces are not involved)
- Continued discussions on the current *Vibrio vulnificus* Risk Reduction Plan for Oysters.
Task Force II, 00-201, 03-209, 03-213, 03-214
Task Force III, 01-302
- Significant modifications to the current *Vibrio parahaemolyticus* Interim Control Plan.
Task Force I, 98-107
- Definitions of "raw" versus "cooked" shellfish.
Task Force II, 97-205, 03-210
Task Force III, 01-301, 01-122, 01-123, 01-223
- New harvester/culturists/processor time-temperature requirements.
Task Force II, 99-209, 00-204, 00-205
- Post-harvest treatment validation and verification requirements.
Task Force II, 01-208, 01-224, 03-212

Certain issues have been considered in committee, several have appeared before the Conference more than once and have been referred back to committee for reconsideration. Issues that are denoted "03," have not been considered in

committee. The responsible task force has the option of resolving the issue or when complex or more information is required, referring it to committee.

In preparation for the meeting, a proposal package that describes the issue, proposed action, and subsequent changes and actions by the Executive Board, task force and committee(s) is provided to the members. The selected issues identified above can be found at <http://www.issc.org/News/Meetings/ISSC-Annual-Meeting/index.htm#Proposals>. Each issue may be addressed by multiple proposals that are denoted by proposal numbers (e.g. 00-201, 03-209, etc). If you do not have access to the Internet, please contact David Heil, 850-488-4033, to request proposal package copies.

Floridian Serves as Region IV Industry Representative

Dan Leonard, Bull Bay Clam Farms, is the Industry Executive Board Region IV representative. He represents all shellfish industry interests from Florida, North and South Carolina, and Georgia. Dan is a member of Task Force III and serves on the Biotoxin, Depuration/Wet Storage and *Vibrio* Management committees. He also sits on the *Vibrio vulnificus* Subcommittee.

In future issues of *Florida Aquaculture*, Dan will be providing ISSC updates on issues important to Florida's shellfish industry. He also strongly urges interested parties to examine the issues on the ISSC web site and contact him to discuss those issues and the sometimes complex ISSC process. Dan can be contacted at 941-473-3292 or clams@sunline.net.

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