

Interstate Shellfish Sanitation Conference

Technical Bulletin Number 3

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ISSC Facts

- Formed in 1982 with federal, state, shellfish industry, and academic members.
- The National Shellfish Sanitation Program is to promote and improve the sanitation of shellfish (oysters, clams, mussels and whole scallops) moving in interstate commerce through federal/state cooperation and uniformity of State shellfish programs.
- ISSC Executive Board includes 6 representatives from producing state shellfish control agencies, 3 representatives from non-producing state shellfish control agencies, 6 industry representatives, 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 non-voting representative from each of three ISSC task forces.



All consumers are demanding safe, nutritious food. Increased public concerns driven by international terrorism, new food technologies, imported food safety, 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, whole scallop, or mussel and wants to buy another one to enjoy again.

In 1924 the need for a uniform national program devoted to shellfish safety was recognized to insure the delivery of safe, wholesome shellfish (oysters, clams, mussels and whole scallops) to the U.S. consumer. This uniform national program is described in the *Guide for the Control of Molluscan Shellfish*.

Shellfish safety is a shared and equal responsibility of the farmer, harvester, certified shellfish house, seafood wholesaler, retailer, restaurateur, and shellfish sanitation agency. The U.S. Food and Drug Administration ensures the compliance of state shellfish sanitation agencies with the *Guide for Control of Molluscan Shellfish*. State shellfish sanitation agencies ensure compliance of the shellfish industry.

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.

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ISSC: 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

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ISSC Mission: Comprehensive safety

The ISSC was formed in 1982 to foster and promote shellfish sanitation through the cooperation of state and federal control agencies, the shellfish industry, and the academic community. To achieve this purpose the ISSC:

- Adopts uniform procedures incorporated into a National 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.

National Shellfish Sanitation Program insures 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 on-going 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 shell-

fish 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 committees address complex issues

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 Clas-

sification, 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 sub-committees: Record Keeping, *Vibrio vulnificus*, *Vibrio parahaemolyticus*, and *Vibrio vulnificus* Education.

Inside 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 repre-

sentative 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 proposals 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 state voting delegates at the general assembly cannot amend a task force recommendation. However, the FDA has final veto authority over proposals that the ISSC approves.

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

Model Ordinance: A core element for molluscan safety

The Ordinance is a core component of the NSSP and establishes the minimum requirements necessary to regulate the interstate commerce of molluscan shellfish and to establish a program to protect the public health of consumers by assuring the sale or distribution of shellfish from safe sources and assuring shellfish have not been adulterated during cultivat-

ing, harvesting, processing, shipping, or handling.

The Ordinance consists of 16 sections that describe every aspect of and requirements for: state shellfish sanitation programs, risk analysis, laboratories, growing areas, relaying, aquaculture, wet storage, harvesting, transportation, dealers, shucking and

packing, repacking, depuration, and post harvest processing.

For additional information about the Ordinance, contact David Heil, 850-488-5471 or visit <http://www.cfsan.fda.gov/~ear/nss3-toc.html>.

History (cont'd from page one)

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 en-

forcing 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.

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COMMISSIONER OF AGRICULTURE

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Additional Information

Technical bulletins produced by the Division of Aquaculture that include shellfish harvesting, handling, safety, and regulatory information include:

Red Tide Regulations
Shellfish Nets and Net Coatings
Cultured Hard Clam Harvesting and Handling

Hard copies are available from the Division by calling 850-488-4033 or by visiting
<http://www.floridaaquaculture.com/>

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Florida represented by two agencies and the Region IV Industry Representative

Florida's vote at the ISSC General Assembly 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 serving as the ISSC Executive Board Chair by David Heil during

1998-99 and a series of EPA, NOAA, and ISSC grants with the Florida Department of Agriculture and Consumer Services that have resulted in innovative *Vibrio vulnificus* educational materials for health care professionals.

Tommy Ward, Buddy Ward and Sons Seafood and Trucking, is the Industry Executive Board Region IV representative. He speaks for shellfish industry interests from Florida, North and South Carolina, and Georgia. He is available to discuss issues before the ISSC or the

complex ISSC process. Mr. Ward's contact information is:

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