

**Conference for Food Protection  
2016 Issue Form**

**Issue: 2016 I-023**

<b>Council Recommendation:</b>	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
<b>Delegate Action:</b>	Accepted _____	Rejected _____	

*All information above the line is for conference use only.*

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**Issue History:**

This is a brand new Issue.

**Title:**

Shellfish Retail Record Keeping

**Issue you would like the Conference to consider:**

Enhancing record keeping at retail establishments.

**Public Health Significance:**

The incidence of *Vibrio parahaemolyticus* (Vp) illness associated with molluscan shellfish consumption is on the increase and continues to be a significant challenge to state and federal health authorities. In 2013 the Interstate Shellfish Sanitation Conference (ISSC) incorporated language into the National Shellfish Sanitation Program requiring increased state regulatory action in response to *V.p.* illnesses. The regulatory response outlined in these new requirements is directly linked to the number of reported *V.p.* illnesses. This approach requires timely investigation of *V.p.* cases by State health officials to determine product source. In many cases, States have been unable to determine the source of the shellfish due to inadequate record keeping as required by Section 3-203.12 of the 2013 FDA Food Code. The National Shellfish Sanitation Program (NSSP) recognizes this requirement as a critical violation. This change would create consistency between the Food Code and the NSSP.

**Recommended Solution: The Conference recommends...:**

that a letter be sent to FDA recommending:

1) Modification of Section 3-203.12(A) of the 2013 FDA Food Code as indicated below from a Priority Foundation to a Priority Violation (language to be added is underlined; language to be deleted is in strikethrough format).

**3-203.12 Shellstock, Maintaining Identification.**

(A) Except as specified under Subparagraph (C) (2) of this section, SHELLSTOCK tags or labels shall remain attached to the container in which the SHELLSTOCK are received until the container is empty. ~~Pf~~ P

2) The FDA begin discussions with the ISSC and Conference for Food Protection to identify steps that can be taken to enhance implementation and enforcement of shellfish record keeping at retail establishments.

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