

NATIONAL SHELLFISH SANITATION PROGRAM (NSSP)

The Interstate Shellfish Sanitation Conference (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. The program exercises sanitary control over all phases of growing, harvesting, shucking, packing, and distribution of fresh and fresh-frozen uncooked oysters, clams, mussels and whole (roe-on) scallops.

To achieve this purpose the ISSC:

- Adopts uniform procedures, incorporated into an Interstate Shellfish Sanitation Program, and 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.

National Shellfish Sanitation Program (NSSP) is based on public health principles and controls to provide a uniform program to prevent illnesses and outbreaks from the consumption of these Molluscan shellfish products.

The Interstate Shellfish Sanitation Conference members and its resulting guidance documents under the NSSP are designed to improve the uniformity of State shellfish sanitation programs and to provide public health controls in the areas of Growing Water Classification, Control of Harvest (Patrol) and Plant Sanitation (Certified Dealers). It is composed of the federal government (FDA, EPA, and NMFS), State-Agencies, Foreign officials, and shellfish industry members. Each has a specific role, however only State agencies of member States can vote on a proposal and its placement into the NSSP.

Presently, there are 35 participating States including the District of Columbia and 5 foreign countries (Ref. Map). These States **CAN RECEIVE** Shellfish from **Certified** Shellfish Dealers in participating States and **CAN SHIP** shellfish to other States, whether these States are participating or non-participating. However since the Non-Participating States have NO Certified Shellfish Dealers their wholesale distributors **CAN NOT** ship shellfish to other States.

In order to ship shellfish to other States the firms must be certified by the State, which is a participating member of Interstate Shellfish Sanitation Conference (ISSC). In order for the State to certify dealers, the firms must comply with the following requirements:

1. (1) A comprehensive, onsite inspection conducted by the state shellfish standardized inspector
2. (2) Certification shall be given only to persons who meet the established requirements established for certification in the NSSP Model ordinance.
3. (3) All certifications shall expire annually. The month selected for certification expiration shall be at the discretion of the Authority.
4. (4) The Authority shall issue only one certification number to a dealer for a location. A person or dealer may obtain more than one certification if each business is:
 1. (a) Maintained as a separate entity; and
 2. (b) Is not found at the same location.
5. (5) The Authority may permit separate certified dealers to share a facility.
6. (6) The certification number issued to each dealer by the Authority shall be unique.
7. (7) Adequate records documenting each dealer's compliance with certification requirements shall be maintained for at least three years. These records shall include:
 1. (a) Inspection reports of dealers;
 2. (b) Notification letters and enforcement actions;
 3. (c) Shellfish sample results and follow-up actions taken;
 4. (d) Records of complaints or inquiries and follow-up actions taken; and
 5. (e) Administrative hearing transcripts and record

Definitions:

Shellfish - All edible species of oysters, clams, mussels, and scallops; * either shucked or in the shell, fresh or frozen, whole or in part. (See the National Shellfish Sanitation Program "Guide for the Control Molluscan-Shellfish".)

Depuration Processor (DP) - A person who receives Shellstock from approved, conditionally approved, restricted, or conditionally restricted growing areas and submits such Shellstock to an approved depuration process.

Repacker (RP) - A person other than the original certified shucker-packer who repacks shucked shellfish into other containers. A Repacker also may repack and ship Shellstock. A Repacker shall not shuck shellfish.

Reshipper (RS) - A person who purchases shucked shellfish or Shellstock from other certified shippers and sells the product without repacking or relabeling to other certified shippers, wholesalers, or retailers.

Shellstock Shipper (SS) - A person who grows, harvests, buys, or repacks and sells Shellstock. They are not authorized to shuck shellfish or to repack shucked shellfish. A Shellstock shipper may also ship shucked shellfish.

Shucker-Packer (SP) - A person who shucks and packs shellfish. A shucker-packer may act as a Shellstock shipper or Reshipper or may repack shellfish originating from other certified dealers.

Post Harvest Processor (PHP) - A certified dealer with the capability to apply a validated post harvest process to reduce the level(s) of hazards not addressed by controls in the 2003 NSSP Guide for the Control of Molluscan Shellfish Chapters XI through XIV.

* Scallops are to be excluded when the final product is the shucked adductor muscle only. [The 1991 ISSC Scallop Committee Report provided a two-year period for incorporating whole and roe-on scallops into the NSSP.]

Food Code Section 3-202.18 requires that shellfish harvesters and dealers (i.e.: Shellstock shipper, re-shipper, re-packer etc.) be certified and assigned a number. Approximately a year ago a few Michigan shippers began having their products rejected by other states since Michigan wasn't in the program and conducting certification inspections under the NSSP criteria.

- Michigan is now registered (As of 12/04/2008) with ISSC (Inter State Shellfish Conference). The two main firms that had the biggest problems shipping - Northern Lakes Seafood & Meats (Certificate # MI 001 RP) and Lipari Foods (MI 002 RS), are now certified and on the ISSC shippers list (Web site <http://www.issc.org>). These firms can begin shipping shellfish to other states. The approved firms have been placed onto the Interstate Certified Shellfish Shippers List, which is published and updated monthly by the FDA and found on the above website.
- Vijaya Pandit from MDARD Food and Dairy has been designated Michigan's Shellfish Sanitation Officer (SSO). Vijaya underwent an extensive training process and has successfully completed field standardization to become the Michigan's first SSO. There are also a few additional requirements that the State must continue to meet in the future as we develop the program. Additional staff would be standardized, in the near future, as back up.
- All Shellstock Shippers (SS) and Re-shippers (RS) must be inspected twice a year. One would be routine and the other inspection would be certification renewal inspection. . Also Re-packers (RP) and Shucker-Packers (SP) must be inspected quarterly each year. This does not include re-inspections for determining compliance. We don't anticipate their being more than 10-20 total firms needing certification. **Anyone wholesaling the shellfish species in the memo above and under the NSSP Shellfish definition must be certified by the State of Michigan Department of Agriculture.**