

Massachusetts *Vp* Control Plan for 2014

APRIL 4, 2014



DEPARTMENT OF PUBLIC HEALTH
BUREAU OF ENVIRONMENTAL HEALTH

DEPARTMENT OF FISH & GAME
DIVISION OF MARINE FISHERIES

DEPARTMENT OF AGRICULTURAL RESOURCES

Outline

2

- I. Introduction/ *Vibrio Emerging in Massachusetts*
- II. Roles of MA Shellfish Control Authority
- III. Process to Develop Enhanced *Vp* Control Plan for 2014
- IV. Enhancements to 2014 *Vp* Control Plan
- V. Illness Investigation Procedures for 2014
- VI. Enforcement of *Vp* Control Plan
- VII. ISSC Proposal #13-202
- VIII. Assistance for Industry
- IX. Ongoing Outreach for 2014 *Vp* Control Plan
- X. Questions

I. *Vibrio* Emerging in Massachusetts

3

- Massachusetts has had an increasing number of individuals diagnosed with *Vibrio parahaemolyticus* (*Vp*) in recent years
 - MA cases investigated by DPH and DMF each year
 - ✦ 2011 – 13 cases
 - ✦ 2012 – 27 cases
 - ✦ 2013 – 58 cases
- In response to 2011 illnesses, US Food and Drug Administration (FDA) directed MA to implement a *Vibrio* Control Plan for Eastern Cape Cod Bay (ECCB) for 2012
- In 2012 harvest areas outside of ECCB are linked to illnesses, therefore FDA directs MA to expand *Vibrio* Control Plan statewide for 2013

Vibrio Emerging in Massachusetts (cont.)

4

- Of the 58 cases reported to DPH in 2013, 33 cases were traced back to one or more MA-only growing areas
 - 19 Vibrio cases with some relationship to Duxbury
 - 12 Vibrio cases with some relationship to Katama Bay
- Consistent with guidance in the ISSC Model Ordinance, (i.e. after the 1st two confirmed cases in each area) closures were ordered in late August (Duxbury, Kingston, Plymouth) and September (Edgartown/Katama Bay)
- As a result of increased confirmed cases in 2013, FDA requires additional enhancements for the state's *Vp* Control Plans for 2014 in Massachusetts and other states

II. Roles of MA Shellfish Control Authority

5

DPH

- Responsible for foodborne illness investigations
 - Licenses wholesale dealers (in partnership with DMF)
 - Conducts shellfish dealer sanitary inspections for *Vp* Control Plan compliance
 - Conducts trace back of shellfish in confirmed cases
 - Collects, reviews and interprets epidemiological data for confirmed *Vp* illnesses

DMF

- Licenses harvesters
- Classification and monitoring of growing areas
- Conducts inspections of landing sites for *Vp* Control Plan compliance

III. Process to Develop Enhanced *Vp* Control Plan for 2014

6

- DPH and DMF sought to engage stakeholders from oyster industry, including growers and wholesale dealers, in developing 2014 Plan
- Stakeholder Listening Sessions – January 2014
 - Plymouth (1/10), Tisbury (1/13), Eastham (1/13)
- Working Meetings with Industry – February 2014
 - Barnstable (2/13), Wareham (2/14)
- Also collected feedback from industry via email

Process for Approval by FDA

7

- DPH and DMF are jointly responsible for developing annual *Vp* Control Plan
- DPH and DMF established a work group develop the 2014 draft Plan
- Submitted to U.S. Food & Drug Administration (FDA) for review
- Returned to DPH and DMF with comments to be addressed (e.g. enforcement and human illness surveillance protocol)
- Plan revised and approved by U.S. FDA

IV. Enhancements to 2014 *Vp* Control Plan

8

- Effective dates will be May 19 – October 19, 2014

- Icing oysters
 - Harvester required to adequately ice oysters within two (2) hours of harvest/exposure by tide
 - All oysters held by dealers in refrigerated storage at their facility will also be required to be adequately iced until shipment

- Shading oysters
 - Harvester required to adequately shade oysters during harvest and during transport to dealer

Enhancements to 2014 *Vp* Control Plan (cont.)

9

- Tagging
 - Harvester required to record time of icing on shellfish tag
- Recordkeeping
 - Harvesters must include time of icing in a *Vp* Logbook
 - Harvester must also indicate in their *Vp* Logbook the dealer who received their oysters
 - Dealers must record harvester permit number and transaction number in receiving records
- Expanded and more specific Corrective Actions section
 - Better addresses deviations from required oyster handling practices
 - Clearer procedures for final disposition of noncompliant oysters

Enhancements to 2014 *Vp* Control Plan (cont.)

10

- Expanded definitions for better industry compliance:
 - Adequate ice
 - ✦ Specific amounts of ice required to completely surround oysters
 - ✦ Ice slurries as an acceptable alternative
 - ✦ Specifications for integration of mechanical refrigeration with adequate ice
 - ✦ Ice must originate from approved sources of potable water
 - Time of harvest
 - ✦ Time when first oyster from a lot is taken from the water OR time of first exposure
 - Time of icing
 - ✦ Time when last oyster is placed in a shellfish container with adequate ice
 - Shellfish container
 - ✦ Smooth, in good condition, easily cleaned, impervious to water, insulated, self-draining, has a tight-fitting lid, and light colored exterior

Enhancements to 2014 *Vp* Control Plan (cont.)

- Re-submergence
 - Permitted for following culture activities:
 - ✦ Anti-fouling
 - ✦ Off-site culling
 - ✦ Wet storage
 - *Activity must be approved by DMF*
 - ✦ Time/temperature abused oysters may be returned to harvest site under certain conditions
 - Re-submerged oysters must comply with following criteria:
 - ✦ Must be returned to harvest waters for a minimum of 14 days
 - ✦ Segregated and properly identified
 - ✦ Under supervision of local shellfish constable
 - ✦ All activity must be recorded in *Vp* Logbook

V. Illness Investigation Procedures for 2014

12

- 1) Illnesses are reported to DPH Food Protection Program (FPP) and/or DPH Bureau of Infectious Disease.
- 2) Infectious Disease epidemiologists contact local health nurses to conduct personal interviews with those that become ill.
- 3) Following these interviews, FPP, assisted by local boards of health (LBOH), reviews shellfish tags and other shipping records to determine which oysters may be implicated in each illness.
- 4) FPP and LBOH evaluate retail shellfish handling practices, including time/temperature control of implicated oysters.

Illness Investigation Procedures 2014 (cont.)

- 5) FPP then evaluates shellfish handling practices and compliance with MA *Vp* Control Plan by all dealers providing oysters to retail establishments.
- 6) When specific harvesters are identified, FPP and DMF evaluate harvester shellfish handling practices and compliance with MA *Vp* Control Plan.
- 7) May result in DPH recall of implicated shellfish among wholesale dealers – including harvester-dealers – and closure of beds by DMF.

VI. Enforcement

14

- Enforcement by DPH Food Protection Program
 - Conduct unannounced inspections of dealer facilities:
 - ✦ Review of shellfish handling practices
 - ✦ Review of HACCP and other relevant records
 - Non-compliance with Plan may result in:
 - ✦ Embargo and/or disposal of oysters
 - time/temperature abuse
 - inadequate records
 - ✦ Continued non-compliance
 - suspension and/or revocation of permits

Enforcement by Division of Marine Fisheries

15

- Division of Marine Fisheries:
 - Unannounced inspections of lease sites and public landings to review:
 - ✦ Shellfish handling practices
 - ✦ Vibrio logbooks
 - Non-compliance with Plan may result in:
 - ✦ seizure of oysters
 - ✦ suspension and/or revocation of permits

Enforcement by Shellfish Control Authority (cont)

16

- **MA Environmental Police:**
 - Enforce DMF emergency regulations – to be filed prior to 5/19
 - Conduct inspections for compliance
 - Seizure/citation
- **Local Shellfish Constables:**
 - Enforce DMF and local regulations
 - Conduct inspection for compliance
 - Seizure/citation

VII. ISSC Proposal #13-202

17

- Provides three-tiered closure procedures to help states deal with sporadic *vibrio* illnesses
 - Adopted by ISSC in January 2014 at its Biennial Meeting, San Antonio, TX
 - Prevents lengthy area closures when risk factors are no longer present
 - Prevents unnecessary recalls or consumer advisories
 - Closure duration based on number of confirmed illnesses within a 30 day period
 - These procedures will not apply in the event of an outbreak associated with an area
 - Can reviewed at www.issc.org

Three Tiered Closure Guidelines

18

Tier 1

- Risk per Serving is $\leq 1 / 100K$ servings OR
- 2 – 4 Illnesses occur but no 2 on same day

- Shellfish Control Authority determine extent of implicated area
- Ensure *Vp* Control Plan compliance

Three Tiered Closure Guidelines

19

Tier 2

- Risk per Serving is $> 1 / 100K$ servings *OR*
- $> 4 \leq 10$ Illnesses occur *AND*
- ≥ 2 but < 4 on same day

- Shellfish Control Authority determine extent of implicated area
- Close Area
- Notify FDA and receiving States

Three Tiered Closure Guidelines

20

Tier 3

- > 10 Illnesses *OR*
- ≥ 4 Illnesses occur on same day

- Shellfish Control Authority determine extent of implicated area
- Close Area
- Initiate Voluntary Industry Recall
- Issue Consumer Advisory

Minimum Closures Under Three Tiered Guidelines

21

7 Day Closure

- Risk per Serving is $\leq 1 / 100K$ OR
- ≤ 4 Illnesses occur but no 2 on same day

14 Day Closure

- Risk per Serving $> 1 / 100 K$ OR
- $> 4 \leq 10$ Illnesses occur *AND*
- ≥ 2 but < 4 on same day

21 Day Closure

- > 10 Illnesses *OR*
- ≥ 4 Illnesses occur on same day

VIII. Assistance for Industry

22

- Massachusetts Aquaculture Industry
 - Direct value of oyster aquaculture is at least \$8 million, but indirect value presents MUCH larger economic impact.
 - Very dynamic sector of overall agriculture in Massachusetts, providing coastal employment AND distinct environmental benefits.
 - Vibrio presents a challenge, but NOT a fatal blow!

SO – What is the state doing to help?

Assistance for Industry

23

- The MA Department of Agricultural Resources (MDAR) will assist the aquaculture industry in compliance with the 2014 *Vp* Control Plan by:
 1. Workshops, training and technical assistance
 2. Agricultural Food Safety Improvement Program
 3. Commonwealth Quality Program

Workshops for Industry

24

- Series of four workshops with DPH and DMF to meet with growers and grower/dealers to further explain and assist in ensuring compliance with the 2014 Vp Control Plan:
 - April 22, 5:00pm - Nauset Regional High School, Eastham
 - April 23, 5:00pm - Barnstable County Complex, Barnstable
 - April 29, 12:00pm – Katherine Cornell Theater, Vineyard Haven
 - April 30 – Duxbury/Plymouth - TBD

Agricultural Food Safety Improvement Program

25

- Reimbursement grant program designed to upgrade food safety measures
- Up to a maximum of \$10,000 per applicant with 25% match. Actual awards will be determined based upon, among other factors, number and quality of proposals and the stated concerns and needs.
- For aquaculture – added consideration for practices under the Commonwealth’s Vibrio Management Plan
- Examples of Eligible Projects for Aquaculture:
 - Commercial coolers/Cold storage
 - Ice Machines/Ice making equipment
 - Harvest gear upgrades
 - Thermometers and time/temperature monitoring equipment

Agricultural Food Safety Improvement Program

26

- Criteria: Need/ clear justification in terms of food safety needs/ priority project area/ adequate supporting documentation/ CQP participants receive enhanced ranking
- **Any incurred project costs that occur prior to an executed contract are NOT eligible for reimbursement**
- For the 1st Round applications must be received by April 23rd, 2014 and projects must be completed by June 30th, 2014
- We are optimistic about a 2nd round of funding for FY2015 – based on appropriation and expect an RFR release in June 2014.
- Grant is available at the Commonwealth website www.mass.gov/agr

Commonwealth Quality Program

27



- Characterize Massachusetts agricultural primary products as quality options.
- Define “local” as Massachusetts sourced.
- Standards based-Recognizes currently utilized food safety standards (Vp Control Plan, NSSP) and sustainability practices as well as emerging trends.
- Provide Massachusetts farms an opportunity to capitalize on current and future demand for “local” products.

Commonwealth Quality Program

28



- Voluntary - Standards based
- Partnership - Industry/ State Initiative
- Audits and on-site consultation-Boots on the ground with the ability to assist
- Prescriptive - Utilize existing grant programs at both the state and federal level to fund upgrades.
- Assist through an innovative marketing approach

IX. Ongoing Outreach for 2014 *Vp* Control Plan

29

- Trainings for Local Boards of Health:
 - MA Health Officer's Association
 - ✦ Education/training for shellfish sanitation and illness investigation
 - April 2014 - Training seminars
 - June 2014 - Quarterly meeting
 - Cape and Islands Health Agent Coalition
 - ✦ Monthly Meetings
 - ✦ Education/training for shellfish sanitation and illness investigation
 - Request that local boards of health provide training to retail food establishments

Ongoing Outreach for 2014 *Vp* Control Plan (cont.)

30

- Enforcement workshops with Environmental Police
 - Education/training on 2014 *Vp* Control Plan enforcement
- Trainings for local Shellfish Constables
 - Education/training on 2014 *Vp* Control Plan enforcement
- Workshops for oyster industry
 - Education and training for compliance with 2014 *Vp* Control Plan
 - ✦ For growers and dealers led by DAR, with DMF and DPH
- Research

X. Open Discussion/Questions

31

