NSSP EVALUATION CRITERIA GROWING AREA CLASSIFICATION

NESSA Meeting
4/9/2019
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of Marine Fisheries

Proposal 13-301; Growing Area Criteria

- **NSSP Evaluation Criteria Committee charged with reviewing criteria provided to it and making recommendations to Executive Board for interim approval.**

- **Board to coordinate piloting of criteria with FDA ASAP.**

2018-2019 Committee Charge

- **A subcommittee is being appointed to develop recommendations for the comments on Proposal 13-301.**

- **Comments were received from FDA, Committee members and the ISSC Executive Office.**

FDA Comments

- **Evaluation Criteria for Shellfish Growing Area Programs (revised 03/29/8)**
- **FDA's list included 78 items: Chapter I Legal Authority**
- **Chapter IV Growing Area Classification**
- **FDA's list included 78 items of which 57 were designated as Critical**

Committee Comments

- **Essentially the FDA proposed list has too many items and too many critical designations.**
- **Need to develop an alternative scoring system of assigned values.**
- **Values will be debited from perfect score.**

ISSC Executive Office Comments

- **Developed with a small work group.**

- **Reduced the Classification of growing area criteria to 8 groups with a point system, rather than using critical and key designations for each item listed in the MO.**

- **Each group was assigned a point value with Committee input based on a total of 100 for the eight groups being a perfect score.**

The Eight Groups with Proposed Point System

- **1. Legal authority- 10**
- **2. Written Survey Reports- 10**
- **3. Shoreline Survey – 10**
- **4. Microbiological Sampling Program – 15**
- **5. Classification -15**
- **6. Laboratory Support -15**
- **7. Marine Biotoxin Control -10**
- **8. Marinas- 10**

Group Content

- I. Legal Authority
- II. Written Survey Reports
  - a. Sanitary Survey
    - i. Current
    - ii. Complete
  - b. Triennial Re-evaluation
    - i. Current
    - ii. Complete
  - c. Annual Review
    - i. Current
    - ii. Complete

Group Content

- III. Shoreline Survey
  - a. Current
  - b. Complete
    - i. were all pollution sources evaluated?
- IV. Microbiological Sampling Program
  - a. Sample Collection
  - b. Data Analysis
  - c. Minimum Numbers of Samples
    - i. If areas not previously classified were classified, were minimum required numbers of samples collected to support classification?

Group Content

d. Sampling Frequencies

i. Did the Authority collected samples at annual frequencies required for the microbiological water quality standards the Authority applied .

e. Timing of Sampling

i. If areas not previously classified were classified, did the Authority collect samples under various environmental conditions?

ii. If the Authority used microbiological standards designated as being for application to areas impacted by point sources, did the Authority collect a sufficient number of samples under adverse pollution conditions.

Group Content

- iii. If the Authority used microbiological standards designated as being for application to areas impacted by non-point sources but not point sources, did the authority meet all requirements for scheduling and implementing water quality sampling?

- f. Water Sample Stations – Did the Authority assure that the number and location of sampling stations is adequate to effectively evaluate all pollution sources?

Group Content

V. Classification

a. Are all growing areas properly classified?

i. Conditional area of management plans

b. Conditional Areas - @.03 C

i. Are all growing areas properly classified? - @.03 A-E Conditional area management

Is there a written conditional area management plan each conditionally managed area?

Group Content

Does the conditional area management plan include all the information required by the NSSP MO, including performance standards and studies to support re-opening criteria?

Were all conditional management plans implemented as written?

VI. Laboratory Support

a. Has the laboratory been evaluated and determined to meet the minimum requirements of the NSSP?

b. Is the state using the appropriate NSSP approved methods for testing?

Group Content

VII. Marine Biotoxin Control

a. Contingency Plan

i. Does the Authority have a Marine Biotoxin Contingency Plan?

ii. Does the Marine Biotoxin Contingency Plan meet all NSSP requirements pertaining to such plans?

b. Management Plan

i. Does the Authority have a Marine Biotoxin Management Plan?

ii. Does the Marine Biotoxin Management Plan meet all NSSP requirements pertaining to such plans?

Group Content

c. Monitoring

i. Does the Authority have a monitoring program if one is required?

ii. If the Authority has a monitoring program, does it meet all NSSP requirements for such programs?

d. Closed Status and Reopening

i. If conditions requiring growing area closure arose, did the Authority close the growing area per NSSP requirements?

ii. If area was closed due to marine biotoxin risk then later returned to open status, did the Authority meet NSSP requirements pertaining to returning area to open status?

Group Content

VIII. Marinas

a. If there are any marinas in or adjacent to growing areas, did the Authority identify them in accordance with the *Guide for the Control of Molluscan Shellfish*?

b. If the Authority identified marinas in or adjacent to growing areas, did the Authority meet all NSSP requirements for classifying waters within marinas properly as well as for classifying waters adjacent to marinas?

Issues

- **FDA feels that the growing area element is the most important therefore everything is critical.**
- **Committee feels the problem is deciding what is of public health significance and articulating a point system.**
- **Everyone, even FDA feels that we need to do something different regarding growing area PEERS.**
- **ISSC wants to develop a simpler approach.**
- **States are apprehensive and want to see results from a pilot before a Proposal is submitted.**

Current Situation

- **ISSC and FDA have been engaged in discussions to move the process along.**