

Record Keeping

Vital for Illness Outbreak Traceback

Why Did Training Committee Select This Topic

- Several shellfish companies with businesses in multiple states have complained that states are applying NSSP record requirements differently

NSSP Purpose

- The NSSP stated purpose is to ensure that shellfish consumed in the US are safe and sanitary

ISSC and FDA Consumption Policies

- Both the ISSC and the FDA policies acknowledge that adherence to the NSSP controls minimizes risk.
- Both policies recognize that molluscan shellfish are often consumed raw or partially cooked and some cases of illness are inevitable from being consumed in this way.
- Both policies state that illnesses are rare but when they do occur, it is the responsibility of state and federal shellfish authorities to immediately take steps to prevent further illnesses.

NSSP Response to Outbreaks of Shellfish-Related Illness

- The Public Health Reasons and Explanations of the NSSP Guide states:

When an illness outbreak occurs, immediate closure of the implicated growing area and recall of implicated product will significantly reduce the chance of additional illnesses

Pre-requisite to Closures and Recalls

- Determining source and distribution
 - NSSP Record keeping provides the information necessary to determine source and distribution

Tagging/Record Keeping

- NSSP requires that the product be identified with certain information showing that the shellfish were harvested by licensed harvesters and shipped and processed by certified dealers.
- Necessary that appropriate State and Federal agencies be able to determine the source of the shellfish and prevent any further illnesses from this source.

Record Keeping (Cont.)

- This can be done most effectively by tracing shipments from point of sale (retail stores or restaurants), through all dealers who have handled it, back to the point of harvest by means of records kept by shellfish dealers.
- Intent of the NSSP requirements is to provide traceability on a lot-by-lot basis

Purpose of Record Keeping Requirements

Chapter VIII and X

- Provide traceability for shellfish in illness investigations
 - Identify source of shellfish
 - Growing area(s)
 - Harvester(s)
 - Identify shippers
- Traceability enables Authority to
 - Determine which area(s) to close
 - Determine size and scope of recalls
 - Stop distribution
- Stopping distribution will minimize illnesses

Chapter VIII .02 F. Shellstock Identification

F. Shellstock Identification.

- 1) Each harvester shall affix a tag to each container of shellstock which shall be in place while the shellstock is being transported to a dealer.
- 5) The harvester's tag shall contain the following indelible, legible information in the order specified below:
 - a) The harvesters' identification number as assigned by the Authority;
 - b) The date of harvest;
 - c) The most precise identification of the harvest location or aquaculture site as is practicable, including the initials of the State of harvest, and the Authority's designation of the growing area by indexing, administrative or geographic designation. If growing areas have not been indexed by the Authority, then an appropriate geographical or administrative designation must be used (e.g. Long Bay, Decadent County, lease number, bed, or lot number).
 - d) The type and quantity of shellstock; and
 - e) The following statement in bold capitalized type on each tag:
"THIS TAG IS REQUIRED TO BE ATTACHED UNTIL CONTAINER IS EMPTY OR IS RETAGGED AND THEREAFTER KEPT ON FILE FOR 90 DAYS."

Examples of Harvester Tag

COMPLETE ON-BOARD / ~~RAPID COOLING~~ / TRADITIONAL HARVEST
(Circle Option Used)

Harvester SPL# or AQ# 52527

Date of Harvest 6-8-2017 Time of Harvest 9:39

Time of Refrigeration, if applicable _____

Specific Harvest Area Name or # (Circle one) 1621

Legal Harvest Location Name or # (Circle one) 1621

Type of Shellfish CLAM / OYSTERS OTHER: _____

Quantity of Shellfish 1 BAG OTHER: _____

CATPOINT DRYBAR MILES
EASTHOLE PLATFORM OTHER: HF

**THIS TAG IS REQUIRED TO BE ATTACHED UNTIL CONTAINER IS EMPTY
OR IS RETAGGED AND THEREAFTER KEPT ON FILE FOR 90 DAYS.**

Examples of Harvester Tag

BULK AQUACULTURE TAG 1575012

ALL SHELLFISH CONTAINERS IN THIS LOT HAVE THE SAME DATE AND AREA OF HARVEST, AS WELL AS THE SAME INTENDED USE

HARVESTER SPL# or AQ# 25750 657A-1284

DATE OF HARVEST 6-21-18 TIME OF HARVEST 0800

Time of Refrigeration, if applicable Traditional Harvest or Rapid Cool 9:30

Legal Harvest Area Name or # 2222

Specific Harvest Area Name or # Oyster Bay base #111

Type of Shellfish Oysters Quantity of Shellfish 2900 count

Product consigned to certified shellfish processor # WDT90263

THIS TAG IS REQUIRED TO BE ATTACHED UNTIL CONTAINER IS EMPTY OR IS RETAGGED AND THEREAFTER KEPT ON FILE FOR 90 DAYS

Chapter X .05 Shellstock Identification

B. Tags.

(2) The dealer's tag shall contain the following indelible, legible information in the order specified below:

- (a) The dealer's name and address.
- (b) The dealer's certification number as assigned by the Authority.
- (c) The original shellstock shipper's certification number. If depurated the original shellstock shipper's certification number is not required.
- (d) The harvest date; or if depurated, the date of depuration processing, or if wet stored, the original harvest date, and the final harvest date which is the date removed from wet storage.
- (e) If wet stored or depurated, the wet storage or depuration cycle or lot number. The wet storage lot number shall begin with the letter "w".
- (f) The most precise identification of the harvest location as is practicable including the initials of the State of harvest, and the Authority's designation of the growing area by indexing, administrative or geographic designation. If the Authority has not indexed growing areas, then an appropriated geographical or administrative designation must be used (e.g., Long Bay, Decadent County, lease number, bed, or lot number).
- (g) The type and quantity of shellstock.

Examples of Dealer Tag

TAG FACE

PERISHABLE
KEEP
REFRIGERATED

CERT#
AK-6947-SS

ORIGINAL SHIPPER'S CERT. No. _____ OTHER THAN ABOVE: _____

ORIGINAL HARVEST DATE: _____ SHIPPING DATE: _____

HARVEST LOCATION: HALIBUT COVE, KACHEMAK BAY, AK

TYPE OF SHELLFISH: _____

PRODUCT OF USA _____ FARM RAISED _____

WET STORED AT AK-6947-SS FROM: _____ TO: _____ Lot#: _____

QUANTITY OF SHELLFISH: 120 COUNT

THIS TAG IS REQUIRED TO BE ATTACHED UNTIL CONTAINER IS EMPTY OR IS
RETAGGED AND THEREAFTER KEPT ON FILE IN CHRONOLOGICAL ORDER,
FOR 90 DAYS. RETAILERS: DATE WHEN LAST SHELLFISH FROM THIS
CONTAINER WAS SOLD OR SERVED: _____

TO: _____

5 1/4"

2 5/8"

Shellstock Tags

- Type of Shellfish Tags
 - Shellfish Harvest Tag
 - Shellfish Dealer Tag
- How long should the dealer(s) retain shellstock tags?
 - Harvest tag (to be kept by dealer) 90 days
 - Dealer tag (to be kept by retailer) 90 days

Chapter X. General Requirements for Dealers

.08 Shipping Documents and Records

A. Shipping Documents.

- (1) Each shellfish shipment shall be accompanied by a shipping document.
- (2) The shipping document shall contain:
 - (a) The name, address, and certification number of the shipping dealer;
 - (b) The name and address of the major consignee; and
 - (c) The kind and quantity of the shellfish product.
- (3) The receiving dealer shall:
 - (a) Maintain in his files a copy of the completed shipping document; and
 - (b) Make the shipping document available to the Authority upon request.
- (4) If the shipment is subdivided to different dealers, each receiving dealer shall maintain records sufficient to trace his portion back to the original shipment.

Shipping Documents

- What is a shipping document?
 - Invoice
 - Bill of lading
 - Manifest

Examples of Shipping Documents

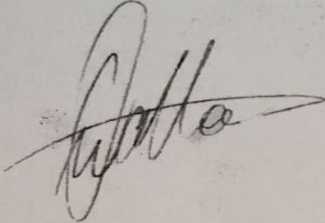
Shipper Name
Shipper Address

INVOICE

Retail Name
Retail Address

INVOICE # 79027
DATE 08/21/2018
DUE DATE 09/04/2018
TERMS Net 14

ACTIVITY -	QTY	PRICE EACH	AMOUNT
FIN FISH:CUT FISH:HALIBUT LB, HALIBUT FILLET	37.10	16.95	628.85
FIN FISH:CUT FISH:#1TunaLoins lb, #1 SUSHI TUNA LOIN	18.40	17.95	330.28
FIN FISH:4/5#salmon lb 4/5 salmon faroe island natural	7.60	9.50	72.20
Shellfish:Oyster. oyster per piece	250	0.89	222.50
BALANCE DUE			\$1,253.83



Shipping Documents

- How long should the dealer(s) retain shipping document?
 - Shipping documents One year; if frozen two years
 - Transaction and Shipping Records One year; if frozen two years

.08 Shipping Documents and Records

B. Transaction and Shipping Records.

- (1) Each dealer shall have a business address at which transaction records are maintained.
- (2) Each dealer shall maintain accurate and legible transaction records that are sufficient to:
 - (a) Document that the shellfish are from a source authorized under this Ordinance;
 - (b) Permit a container of shellfish to be traced back to the specific incoming lot of shucked shellfish from which it was taken;
 - (c) Permit a lot (or commingled lots as per Chapter I. @.01 F.) of shucked shellfish or a lot of shellstock to be traced back to the growing area(s), date(s) of harvest, date and location of wet storage, if applicable, and if possible, the harvester or group of harvesters.
 - (d) Trace the wet storage history of the shellstock including, original harvest site, original harvest date, wet storage site(s) and dates.

.08 Shipping Documents and Records

- (3) Purchase and sales shall be recorded:
 - (a) In a permanently bound ledger book; or
 - (b) Using other recording methods acceptable to and authorized by the Authority. Entries of purchases or sales of shellfish shall be made into a permanently bound ledger book, computer record, or other method acceptable to and authorized by the Authority within seventy-two (72) hours of any purchase or sales.
- (4) The transaction records shall be retained:
 - (a) In the case of fresh shellfish, for a minimum of one (1) year; and
 - (b) In the case of frozen shellfish, for at least two (2) years or the shelf life of the product, whichever is longer.
- (5) If computer records are maintained, the Authority shall approve the format and its use.

What are Transaction and Shipping Records?

Transaction Record means the form or forms used to document each purchase or sale of shellfish at the wholesale level and includes shellfish harvest and sales records, ledgers, purchase records, invoices and bills of lading.

SHELLFISH RECEIVING/SALES LOG

Firm Name: _____
Firm Address: _____

RECEIVING						SALES					
Lot	Date/Time	Amount	Harvester	Harvester License #	Harvest Location	From Lot	Date Sold	Amount	Whole or Shuck	Sold to	Initials
A											
B											
C											
D											
E											
F											
G											
H											
I											
J											
K											
L											
M											
N											

HACCP RECORDS MUST BE REVIEWED, SIGNED, AND DATED AT LEAST ONCE EVERY SEVEN (7) DAYS. Shellfish must be received and placed in cold storage within 18 hours of harvest in the summer (May 1-Sep 30) and within 24 hours in the winter (Oct 1-Apr 30).

Transaction and Shipping Records

- What should be included?
 - Harvester to dealer transactions
 - Harvest area
 - Harvest date
 - Harvester ID
 - Quantity and type
 - Dealer to dealer transactions
 - Dealer name or certification number
 - Lot codes
 - Bill of Lading number
 - Other comparable identification information

SHELLFISH RECEIVING RECORD								
Firm Name: _____				Product description: _____				
Firm Address: _____				_____				
Critical limits: Each lot, batch or sack of shellfish must be visually inspected to ensure that it is properly tagged with original dealer's certification number (if any), harvester's identification number, harvest area and date, quantity and type of product. Shellfish previously refrigerated or received from out-of-state must be in refrigerated trucks at 45°F or less.								
Corrective action: Reject any product that does not meet critical limits.								
Date of receipt	Type & quantity	Harvest area	Harvest date	Harvest time	Name & dealer cert. # or harvester ID	Receipt temp.	Initials & time	Corrective actions

(Weekly) Reviewed: _____ Date: ____/____/____

*These records were developed as training/demonstration tools in conjunction with the Florida Department of Agriculture and Consumer Services.

Shucker/Packer Lot Records

Sales Disposition Record

Restricted Use Shellstock (Shucking or PHP)

Certified Dealer Number: _____

Sales/Disposition Record

[illegible]

Transaction and Shipping Records

- How long should the dealer(s) retain shipping document?
 - Shipping documents One year; if frozen two years
 - Transaction and Shipping Records One year; if frozen two years

Transaction Records and Illness Investigations

- Transaction records are necessary for compliance with Chapter II:
 - *Chapter II. Risk Assessment and Risk Management Requirements for the @.01 Outbreaks of Shellfish-Related Illness*
 - *Must complete investigation within 24 hours*
 - *If can't complete investigation within 24 hours*
 - Voluntary recall by dealer(s)
 - Area closure(s) by Authority(ies)
 - Notify FDA and ISSC

Conducting Traceback

- Investigation from point of consumption to harvest area
 - Retail
 - Dealer Tags
 - Invoices or other shipping records
 - Dealer
 - Shipping documents
 - Transaction records
 - Invoices, Bill of Lading, manifests, etc.
 - Harvest tags
 - Notification of appropriate agencies
 - State Authority
 - FDA Specialist
 - ISSC

Investigation Flow Chart

