

MEMORANDUM

DATE: December 22, 1997

TO: Division of Shellfish Sanitation Staff

FROM: Robert E. Croonenberghs, Ph.D., Director
Division of Shellfish Sanitation

THROUGH: Eric H. Bartsch, P.E., Director
Office of Water Programs

SUBJECT: Shellfish Plants - Procedure - Information - Intermediate Processing Plan

PURPOSE

The objective of this protocol is to explain the NSSP intermediate processing plan requirements as they are to be followed in Virginia.

INTRODUCTION

The NSSP requires that when a dealer receives bulk shellfish, *i.e.*, with only one tag or transaction record, that dealer "shall have an intermediate processing plan approved by the Authority which establishes the procedures the dealer shall use to tag the lot during washing, packing or staggung of shellstock."

DISCUSSION

The point of the intermediate processing plan is to keep track of the harvest area of product in plants. When small containers of product are brought in, each with a harvester tag, identity is more easily maintained than when shellfish are delivered loose or in containers that are not individually tagged.

The shellfish specialist is to develop a written intermediate processing plan with dealers that handle product from harvesters accompanied by transaction records. This plan should be as simple as possible, and will establish the procedures by which the dealer maintains identity of the shellstock while in the plant prior to final tagging. The specialist can either require that the dealer write the plan or the specialist can write it up. In either case, both the dealer and the specialist need a copy.

The Model Ordinance (Section X.05) indicates that an intermediate processing plan is not needed when plants are operating under a commingling plan. However, we will require this plan in Virginia for several reasons. It is not reasonable to assume that plants will only accept product from one commingling area. Also, under our commingling plan, product from different commingling areas cannot be mixed. Furthermore, dealers are to keep track of which harvest areas are included in "batches" of product labeled with the commingling area name or code. DSS is defining a batch in its commingling plan as "a collection of shellstock of no more than 3 consecutive day's harvest from one commingling area."