



Mid-Atlantic Fishery Management Council

800 North State Street, Suite 201, Dover, DE 19901
Phone: 302-674-2331 | FAX: 302-674-5399 | www.mafmc.org
Michael P. Luisi, Chairman | P. Weston Townsend, Vice Chairman
Christopher M. Moore, Ph.D., Executive Director

September 15, 2022

Alexa Cole, Director
NOAA IATC Seafood Inspection Program
Office of International Affairs, Trade, and Commerce
1315 East-West Highway
Silver Spring, MD 20910

Dear Alexa:

We recently had discussions with staff from the National Oceanic and Atmospheric Administration (NOAA) - Office of International Affairs, Trade, and Commerce (IATC) - Office of Seafood Inspection (Laurice Churchill) and the Food and Drug Administration (FDA; Quentin Forrest) to gather information about the National Shellfish Sanitation Program (NSSP) 2019 revisions to the "Guide for the Control of Molluscan Shellfish (i.e., Model Ordinance and Supporting Documents)." The NSSP is the federal/state cooperative program recognized by the FDA and the Interstate Shellfish Sanitation Conference (ISSC), for the sanitary control of bivalve molluscan shellfish produced and sold for human consumption through interstate commerce. The NSSP Model Ordinance (MO) provides specific requirements for state shellfish programs and the shellfish industry and includes the roles and responsibilities for federal agencies (FDA and NOAA), for bivalve molluscan shellfish grown and harvested in Federal waters. This includes biotoxin protocols for molluscan shellfish in Federal waters.

Revisions to the guide have implications for our Federal water Atlantic surfclam and ocean quahog fisheries given that any implemented changes may impact protocols with respect to paralytic shellfish poisoning (PSP) closed areas in the Georges Bank fishing areas or other federal waters. We believe addressing this issue in a timely manner should be a high priority for the NOAA IATC, Seafood Inspection Program and we look forward to having our staff continue to track and stay engaged with your staff, as well as your FDA partners. We look forward to working closely with your staff as the 2019 guide revisions are developed.

Please call me or Jessica Coakley of my staff if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "C. Moore".

Christopher M. Moore, Ph.D.
Executive Director

cc: L. Churchill, J.Q. Forrest, M. Luisi, J. Montañez, M. Pentony, D. Potts, W. Townsend, S. Wilson