



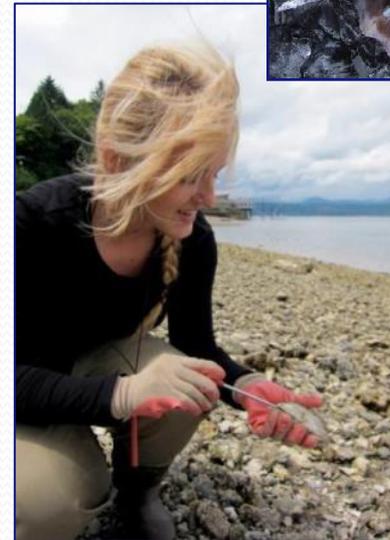
2014 *Vibrio parahaemolyticus* Control Plan Rule Revision

Washington State Board of Health
March 11, 2015

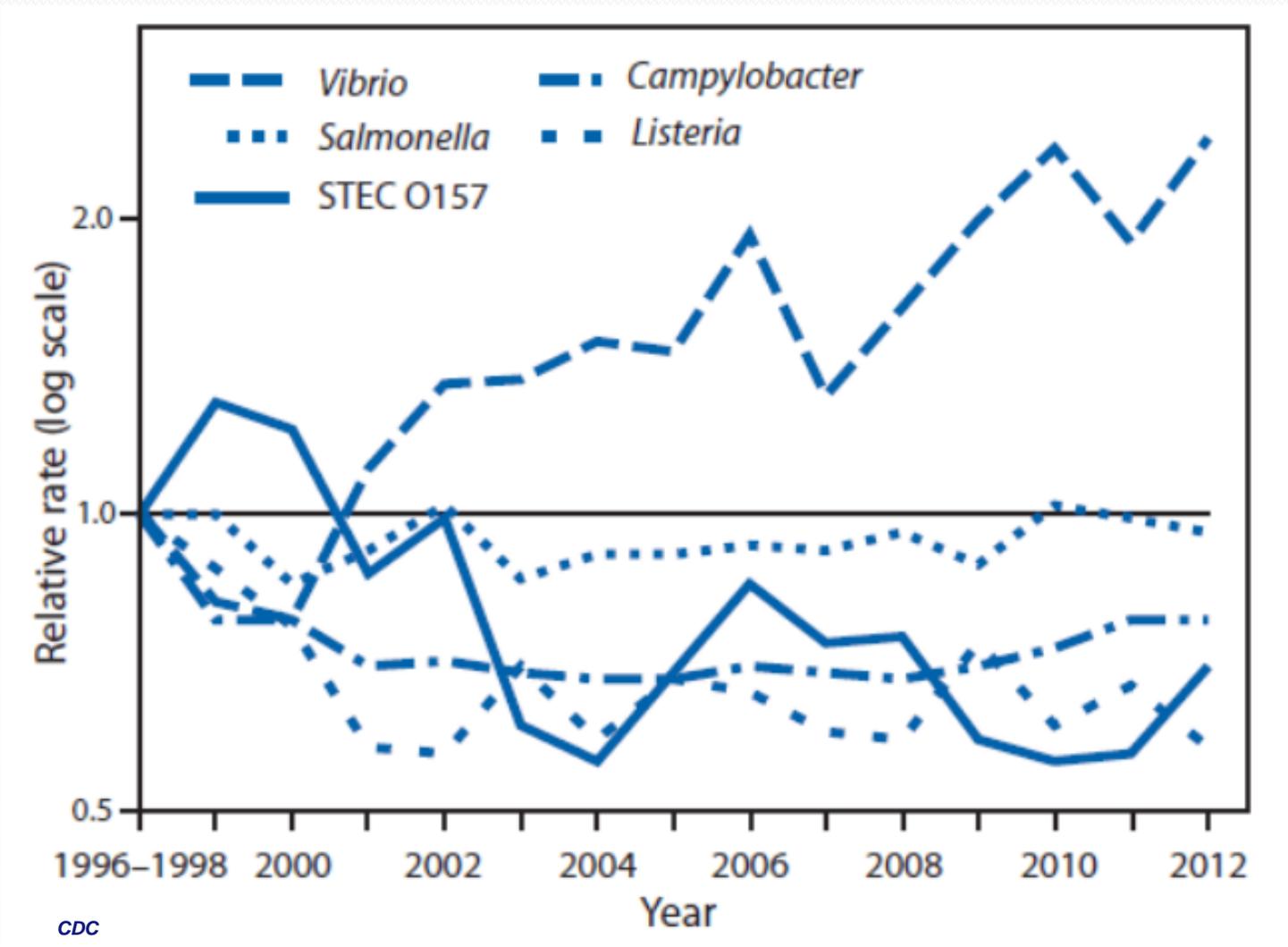
Rick Porso, Deputy Director, Office of Environmental Health and Safety

Today's Briefing

- Background
- Purpose of Rule Revision
- Rule Development Process
- Main Changes in Rule
- Next Steps

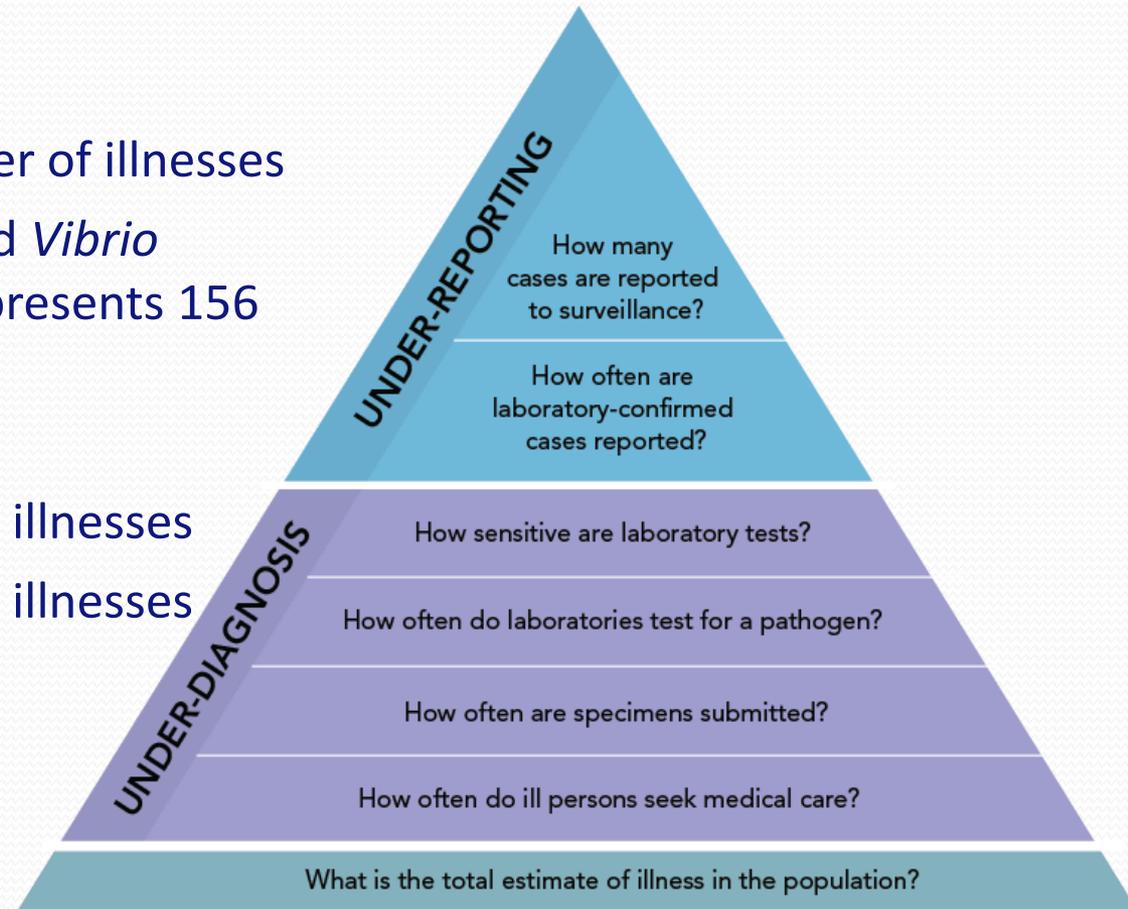


Background – National Increase in *Vibrio parahaemolyticus* Infections



Background – High Incidence of *Vibrio parahaemolyticus* Associated with Washington Oysters

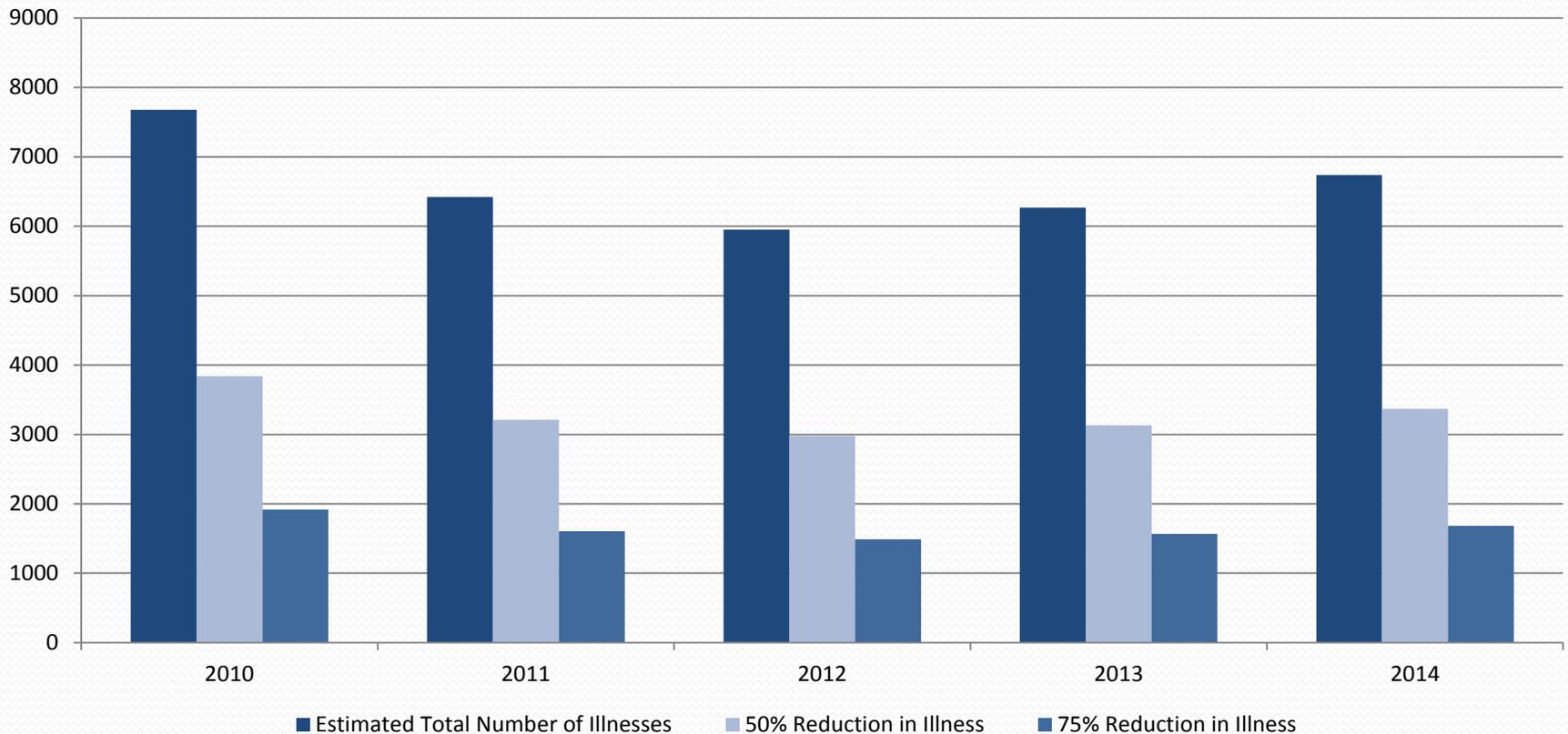
- **6,736** Estimated total number of illnesses
- CDC estimates each reported *Vibrio parahaemolyticus* illness represents 156 estimated illnesses
- **3,368** 50% reduction in total illnesses
- **1,684** 75% reduction in total illnesses



Public Health Agency of Canada

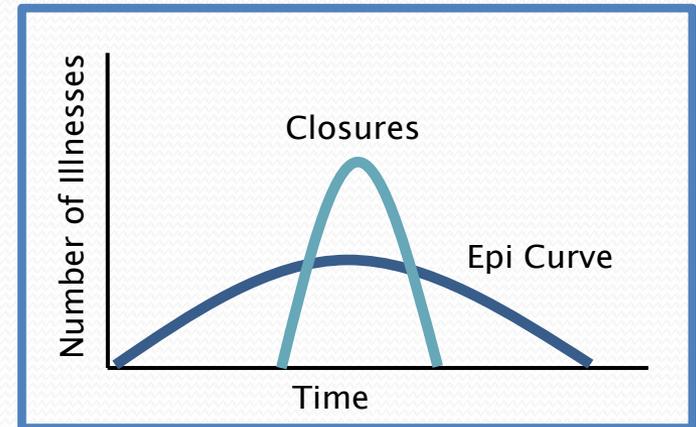
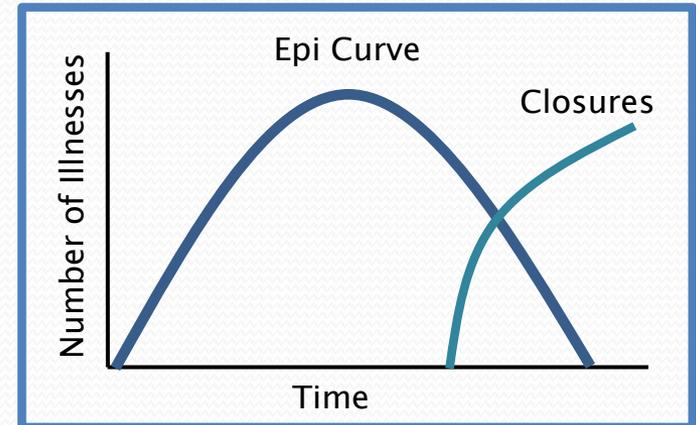
Background – Opportunity to Reduce *Vibrio parahaemolyticus* Illnesses

Proposed Rule Estimated Reduction in Illness associated with Washington Oysters



Purpose of Rule Revision – How the Proposed Rule is likely to Reduce Illness

- Prevent *Vibrio parahaemolyticus*-associated illnesses
 - Move towards a proactive management approach
 - Base controls on risk and environmental conditions
- Align Washington's Control Plan with the national requirements



Rule Development Process

- Convened *Vibrio parahaemolyticus* Advisory Committee (VpAC)
 - Tribes, shellfish industry, LHJs, WDFW, FDA, and research partners
 - Met over a two-year period
 - Formed three subcommittees to address challenging topics
- Engaged with FDA throughout rule development
- Shared rule progress at key meetings and conferences



Thank You

- Adam James - Hama Hama Oyster
- Andy Depaola - Food and Drug Administration
- Andy Suhrbier - Pacific Shellfish Institute
- Austin Docter - Taylor Shellfish
- Beth Melius - DOH Epidemiology
- Bill Dewey - Taylor Shellfish
- Bo Ingham - Olympia Oyster
- Brian Hiatt - DOH Public Health Lab
- Brian Sheldon - Northern Oyster
- Bruce Brenner - Brenner Oyster
- Caron Denotta - Denotta Seafood
- Corinne Story - Skagit County Health
- Dan Brinson - Department of Fish and Wildlife
- Dan Wilson - Olympia Oyster
- Darrell Moudry - Coast Seafoods
- Dave Nisbet - Nisbet Oyster
- Dave Steele - Rock Point Oyster
- David Fyfe – Northwest Indian Fisheries Commission
- Gina Olson - DOH Public Health Lab
- Gordon Martinen - Wallins Oyster
- Ian Jefferds - Penn Cove Shellfish
- Jacob Moore - Willapa Grays Harbor Oyster Growers Association
- Jaimie Courtney - Washington State Seafood
- Jared Keefer - Jefferson County Environmental Health Department
- Jason Ragan - Taylor Shellfish
- JJ Johnson - Marrowstone Island Shellfish
- Jon Wolf – Skokomish Tribe
- Jonathan Davis - Baywater Inc
- Kathleen Nisbet - Nisbet Oyster

Thank You

- Ken Weigardt - Weigardt & Sons
- Kris Phelps- Food and Drug Administration
- Laurie Stewart - DOH Epidemiology
- Margaret Barrette - Pacific Coast Shellfish Growers Association
- Mark Ballo - Brady's Oysters
- Marshall Kinsey - Food and Drug Administration
- Mary Bennett - Wallins Oyster
- Mat Buldis - National Fish & Oyster
- Michael Antee - Food and Drug Administration
- Miranda Ries - National Fish & Oyster
- Nick Jambor - Ekone Oyster
- Randy Hatch - Point No Point Treaty Council
- Rohinee Paranjpye – National Oceanographic and Atmospheric Administration
- Scott Gellatly - McDonald Mollusca
- Scott Grout - Gold Coast Oyster
- Steve Bloomfield - South Sound Aquaculture
- Steve Booth – Pacific Shellfish Institute
- Sue Shotwell - Nisqually Tribe
- Susan Shelton - Benton-Franklin Health
- Tamara Gage - Port Gamble S'Klallam Tribe
- Teri King - Sea Grant
- Tim McMillin - Olympia Oyster
- Tom Bloomfield - Independent Oyster
- William Glover - DOH Public Health Lab

Main Changes in Rule

Component	Proposed	Reason
Shucked meats	Exempt shucked meats and post harvest processed oysters	Compliance with Model Ordinance: current language is not permitted, adds clarity
Shellfish production data	Requirement to report	Compliance with Model Ordinance: a requirement for Shellfish Authorities, voluntary compliance was not successful
Growing area categories	Risk level based on historic illness trend	Adaptive: matches the growing area risk and the stringency of controls
Time of harvest to	Cooling (reaching and maintaining 50°F)	Preventative: substantially reduces the post-harvest growth of Vp
Time reduction and closure	Air temperature threshold and Harvest (water or tissue) temperature threshold	Preventive: manages the pre-harvest risk inherent in warmer months; reduces the post-harvest growth of Vp by reducing the number of hours to cooling based on elevated temperatures; and acknowledges that there are conditions when Vp levels in the environment will cause illnesses and post-harvest mitigation is not sufficient to prevent illnesses
Closure period	24 hours	Targeted: focuses closure on risk period
Waivers	Based on providing a comparable level of public health protection	Adaptive: encourages best management practices, innovation, and flexibility

Public Comments

- PCSGA facilitated a webinar to review and discuss the proposed rule on February 20, 2015
 - DOH presented the rule text subsection by subsection
 - About 35 members participated
 - Materials distributed to PCSGA membership and Tribal Technical group
- 5 comments received by deadline of February 25, 2015
 - 2 support adoption
 - 2 request clarifications
 - 1 does not support adoption
- Additional requests for clarification were received
 - Delayed implementation and training

Summary of Concerns and DOH Recommendations

- Exempt production data from disclosure laws
 - Would require a RCW change
 - Recommend adopting as proposed
- Should be more difficult to be category 3 and easier to be category 1
 - Based on the initial 5 year data (2010-2014) only 16 of the 102 growing areas are in category 2 or 3
 - Recommend adopting as proposed
- Make the proposed rule more clear that only single-source illnesses are being used in the risk categorization
 - Recommend accepting clarifying change

Summary of Concerns and DOH Recommendations

- Use a five year rolling average rather than total illnesses over five years for risk categories
 - Recommend accepting clarifying change
- Temperature thresholds are too low
 - Thresholds are based on review of 3 years of single source illness data
 - Based on VpAC feedback: revised up 1 degree, created 2 degree restriction, limited to July-August only
 - Recommend adopting as proposed
- Replace the word "calibrate" with "verify" in the proposed rule subsection 12
 - More accurately reflect the intent of the requirement
 - Recommend accepting clarifying change

Summary of Concerns and DOH Recommendations

- Doubt DOH ability to train the industry and implement the rule for 2015
 - DOH is committed to conducting trainings to successfully implement the rule
- Be clear that the harvest plan deadlines will not apply for 2015 and that companies can operate in 2015 without an approved harvest plan
 - DOH intends to work with the industry through trainings and during the 2015 season to ensure plans will be in place for 2016
- Want SBOH to direct DOH to meet annually with VpAC and conduct a formal rule review in 3 years
 - DOH committed to meeting with VpAC and will conduct a 3-year review
 - Recommend accepting clarifying change

Next Steps: Outreach

- Develop samples, templates, and guides
- Train tribes and shellfish industry
 - 10 trainings (scheduled to date)
 - March 17 until May 12
 - Aberdeen (2), Burlington (2), Hoodspport (1), Kent (1), Port Angeles (1), Renton (1), South Bend (1), Tumwater (1)
 - Planning additional trainings with Tribal Technical group



Next Steps: Implementation

- Finalize near real time data sensor deployment and visualization
 - Planned deployment in 25 areas
 - Deploy at least 1 device in all category 2 and 3 risk areas
- Create a central repository for temperature data
 - Provide commercial, recreational, and private tideland shellfish harvesters greater access to temperature data
 - Have a public-private partnership approach to temperature data access
- Utilize temperature data to prioritize patrols

Questions?

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www.doh.wa.gov/CommunityandEnvironment/Shellfish/Rules/VibrioRuleRevision