

VpAC Vibrio Rule Development Meeting

May 16, 2013

Attendees

In Person: Adam James, Austin Docter, Bill Dewey, Brandy Brush, Brian Sheldon, Cari Franz-West, Corinne Story, Darrell Moudry, Dave Steele, Jason Ragan, Jerrod Davis, Kathleen Nisbet, Laura Wigand, Margaret Barrette, Mark Ballo, Michael Antee, Miranda Ries, Randy Hatch, Rick Porso, Scott Grout, Steve Bloomfield, Sue Shotwell, and Tom Bloomfield

Via tele-Conference: Brian Sheldon

Purpose

The purpose of the Vibrio parahaemolyticus Advisory Committee (VpAC) is to work with the Department of Health to provide recommendations for consideration in future rule making regarding the Vibrio control plan set forth in WAC 246-282-006. The Department of Health will draft rule language that will be provided to the State Board of Health for review. The State Board of Health has the responsibility of approving any changes or modifications to the WAC, which may or may not include recommendations put forth by the committee.

Meeting Notes

Procedural:

- Reviewed working agreements
- Will schedule meetings over the summer

Environmental Sampling Subcommittee Update:

- Possible site additions/revisions:
 - o Little Skookum (Gordon Martina (sp?) near the mouth may be a good site)
 - o Hood Canal 6: Taylor has a site on the east side of Anna's Bay, can pick one of Scott's sites
- Sampling usually begins the end of May, delayed until July 1 to allow internal *trh* validation by the Public Health Lab
 - o Will do spot sampling prior to July in areas with historical high results (Hood Canal 6-9)
 - o Sea Grant testing for Vp in Hood Canal, DOH will try to acquire their data

Tiered Approach Group Presentations:

- Low Risk:
 - o Thought that considering both temperature and tidal exposure were important factors to consider
 - o Controls:
 - Suspend harvest when water temperature exceeds 70° for inland areas or 65° for coastal areas in July and August. Maintain HACCP records of harvest time and temperature.
 - Close growing area when there is a -3' tide and ≥80° air temperature between 11am and 5pm in July and August.
- Moderate Risk:

- Controls:
 - Harvest within 4 hours if air temperature is between 65-75°, harvest within 3 hours if air temperature is between 75-85°, suspend harvest when air temperature is $\geq 86^\circ$.
 - Harvest within 4 hours if water temperature is between 65-70°, harvest within 3 hours if water temperature is between 70-75°, suspend harvest when water temperature is $\geq 76^\circ$.
 - Dredge, same but begin exposure after harvest.
- Need more data to support the numbers and need more dialogue of how to set the inland and coastal temperature ranges
- Were trying to capture the correlation between air and water temperature
- Harvest within x hours of exposure means to get under temperature control
 - Should not harvest if you don't have the means to get product under temperature control, must be able to begin to cool the product within the hours listed
- High Risk:
 - Controls:
 - Suspend harvest when water temperature is $\geq 63^\circ$. Water temperature should be taken by site foreman at 1' depth on receding tide prior to intertidal harvest and be recorded in a temperature log.
 - Intertidal harvested product must be under temperature control by book low tide or if product is submerged, it must be re-submerged for a minimum of 12 hours prior to harvest and must be under temperature control within 3 hours.
 - Wanted to capture re-submergence, but unclear that re-submerging reduces the Vp load
 - Challenging to create a one size fits all, many different harvest techniques by different companies and need to maintain cottage industry aspect of shellfish harvest
 - Example: may be cost effective to shade a high value product like Kumos, but not uniformly realistic industry wide
 - Coast and inland harvest methods are very different
 - Need individual company assessments/specific company plans

Tiered Approach Discussion:

- Low Risk:
 - Temperature control:
 - 65 on the coast is too low
 - Need more info on temperatures to set a specific threshold
 - This is for low risk areas, so should rarely cross the threshold
 - 70 on coast and inland would be better
 - Agree on concept, may need to adjust the specific numbers
 - Just covered July and August, assumed low risk areas would not have illnesses/high Vp levels for the whole season, just the peak
 - Using temperature as a control will create a product marketing challenge, won't know if you can/can't harvest until day of, hard to organize crew and supply product to buyers
 - Can allow equivalent technology clause

- Example: if you use telemetry can determine if the temperature is at the threshold without going out to the site, then can inform crew early
 - When you see temperatures start to creep up, could set a lower threshold for your company, know that you'll likely not harvest for a few days like how rainfall closures work
 - Tidal exposure control:
 - Should be based on exposure time, not harvest time
 - The laundry list of criteria is purposeful, just trying to capture rare/extreme events, not trying to limit harvest as much as account for a really rare confluence of factors
 - Too severe for low risk, remove
- Moderate Risk:
 - Air temperature control:
 - Should clarify the time limitation is on exposure, getting product under temperature control not on harvest time
 - Should consider using book low rather than setting an hour limit
 - Need to consider harvest type, should be different for intertidal and submerged
 - Coast should be 10 hours
 - May not need to separate coast vs. inland, already differentiated by risk level
 - Do need to have separate controls for harvest methods
 - May not need air and water temperature controls
 - Should focus on water temperatures, air covered by TTCs in the MO
 - Water temperature control:
 - Coast should be within 10 hours
 - Need to base the hours/temperature thresholds on information of growth patterns and times, etc.
- High Risk:
 - Temperature control:
 - Agree that at some temperature harvest should stop, need more information on what that threshold is, 63 may be too low
 - Intertidal exposure control:
 - 1 hour exposure instead of book low (~2.5 hours)
 - Needs to be most conservative, may be too lenient as written
 - Example: if book low is 2pm and you're harvesting at 10 am, there is no ratcheting down with this measure
 - Must be read as a logic statement, if about 63° then no harvest, so this control is to provide stringency for when temperature is under 63°
 - Do need to account for exposure and for re-submergence

General Discussion:

- Challenging to come up with controls when don't know what the risk levels mean/who fits where
 - Some benefit to not knowing who fits where/takes out the personal aspect, should create fair and reasonable controls regardless of where individual companies fit, more awkward/jousting when you know what box you'll be in

- Temperature data collection:
 - o Will have dataloggers at each sampling site, can purchase more
 - Would be good to work with industry to have more temperature collection, check dataloggers are working, etc.
 - o Dataloggers are not the same as checking temperature at time of harvest, would be good to have industry collect that data as well
 - o Harvesters should collect surface water temperature on day of harvest on outgoing tide
 - o Need to also consider how to take temperature for dredge product, easy to have datalogger in tub and take at time of harvest
 - o Record temperature as a HACCP document
 - o Have foreman take the water temperature at the harvest site with a calibrated thermometer prior to intertidal harvest , for submerged product can take temperature at product depth and keep the same temperature record
- Need more input from growers on the ground
 - o Should reserve meeting times to speak to growers out on the coast, on Hood Canal, etc to discuss the controls and get feedback
- Risk assessment progress:
 - o Need one more round of calls, hopefully get complete data from at least some Hood Canal growing areas
 - Darrell: will make coastal calls
 - Steve: will make calls
 - o Need to resolve how to count multi-source illnesses
 - Working with FDA on the calculations, trying to get better resolution but keep it a manageable process
 - o Getting and averaging the DFW data by month may give a sense of how our numbers compare
 - May not be reliable
 - Could give a sense of large and small producers
 - o Should focus on FDA risk of 1 in 100,000
 - Must then consider multipliers and scaling factors to equate this risk to growing areas, need to resolve under-diagnosis factor
 - FDA revising their risk calculations
 - Tiered controls are based on a range of risks, not setting an acceptable risk
 - Hoping to work from relative risk, keeps the process simple, specific to Washington and comparable across growing areas

Subcommittees:

- Risk Assessment:
 - o Continue calls to encourage landings reporting
- Environmental Sampling:
 - o Finalize sampling site list and contact information

Next Steps:

- DOH email:
 - o Listserv to request companies compile data as season progresses, may aid in 2013 data reporting
 - o Schedule more meetings