

HANDOUT B

DRAFT strategic plan to prepare for and respond to biotoxin events

The following DRAFT plan includes several tools identified to improve preparation for and response to biotoxin events that affect Oregon's commercial Dungeness Crab industry. This DRAFT plan was developed during summer 2017 as part of the Dungeness Crab & Biotoxin Advisory Committee's work to advise ODA and ODFW on strategies to improve traceability in crab and protect public health while minimizing disruption to the industry during biotoxin events.

Some of the tools can be implemented within a year (short term), while others will take several years (long term).

Tools that can be implemented in the short term

Tool	Time frame this tool can be implemented	Responsible parties	Considerations
Provide notice to industry (a) if biotoxin monitoring in crab extends beyond the season opening; (b) when samples are being taken from the various locations; (c) when results are available; and (d) when crab viscera in a particular zone are testing near the DA	<ul style="list-style-type: none"> Fall 2017 	<ul style="list-style-type: none"> ODA can post this information on the ODA shellfish biotoxin monitoring web site. ODFW and ODA will work on establishing a targeted listserv that ODA can send messages to 	<ul style="list-style-type: none"> ODA already posts recreational shellfish and commercial crab biotoxin test results on our web site, so it's just a matter of adding the requested information and also making sure industry and the public is aware of where to go for this information. For sampling schedules, posting on a website which industry can monitor is sufficient, but prefer an outgoing notification (text or email) for sample results.

FOR DISCUSSION PURPOSES ONLY

Tool	Time frame this tool can be implemented	Responsible parties	Considerations
limit.			
Adopt rule describing the biotoxin monitoring process, FDA biotoxin thresholds, and options for evisceration /or closure	<ul style="list-style-type: none"> Advisory Committee met during summer 2017 Rule comment period and adoption planned for September-November 2017 	ODA in coordination with ODFW and advisory committee	<ul style="list-style-type: none"> These rules provide the process and conditions for use of evisceration when there is biotoxin above the threshold in crab viscera. This provides certainty to the industry for business planning purposes. Evisceration option would include prohibitions on whole crab sales unless they are sold to processor licensed by ODA who eviscerates them. Will plan to have harvest zone maps available for the public to view at public hearing so ODFW and ODA can get feedback on the zones as well as the draft rule.
Create biotoxin zones along the coast and mechanism for tracking area of harvest through the market chain	<ul style="list-style-type: none"> Could be used during the 2017-2018 fishing season Can be revised in the future if needed 	ODA and ODFW would establish the biotoxin zones with input and assistance from industry	<ul style="list-style-type: none"> Zones would help achieve traceability in a biotoxin event Small zones would allow more precise restrictions or closures, but could split up fishing grounds; large zones would avoid splitting fishing grounds but larger area would be affected by biotoxin events
Adopt rule with new recordkeeping requirements for wholesale fish dealers and limited fish sellers: add	Temporary rule by start of 2017-2018 fishing season, permanent rule within 6 months of temporary rule	ODFW	<ul style="list-style-type: none"> If a biotoxin event occurs, ODA would request these records from first receivers of crab, for crab landed from the zone(s) of concern since the date the sample of concern was gathered. If evisceration restrictions are put in place, ODA will continue to request these records

FOR DISCUSSION PURPOSES ONLY

Tool	Time frame this tool can be implemented	Responsible parties	Considerations
harvest area and landing date to current “one-back” requirement and establish “one forward” requirement.			until unrestricted harvest reopens.

Tools that can be considered in the long term

Tool	Time frame this tool can be implemented	Responsible parties	Considerations
Track harvest areas on fish tickets	1 to 3 years	ODFW and industry	<ul style="list-style-type: none"> Will involve modifying of IT systems to allow tracking of multiple harvest areas.
Require electronic fish tickets	3 to 5 years	ODFW and industry	<ul style="list-style-type: none"> Benefits include real-time tracking of buyers and landings from harvest areas The feasibility and success of this tool is contingent on funding for equipment to access new electronic fish ticket systems (industry) Full benefits are contingent on ODFW ability to add multiple harvest areas to the current electronic fish ticket system
Require electronic log books	3 to 5 years	ODFW and industry	<ul style="list-style-type: none"> The feasibility and success of this tool is contingent on funding to develop a workable electronic logbook system and on industry feedback.

FOR DISCUSSION PURPOSES ONLY

<p>Obtain authority for ODA to have access to unlicensed dealers'* records that are related to traceability & public health</p>	<p>ODA could submit a concept for the 2019 legislative session, or we could try February 2018 short session if industry could find a legislative sponsor. Then ODA would need to adopt rules working with advisory committee.</p>	<p>ODA, legislators, with help from industry in reaching out to affected parties</p>	<ul style="list-style-type: none"> • Need to make sure we reach out to dealers that are currently not licensed by ODA to get their feedback and incorporate it into any concepts. • ODA needs to complete legal research on the best policy tool to be able to access records of dealers not licensed by ODA.* • ODFW can provide mailing lists for all crab buyers.
---	---	--	---

*Note: some dealers of crab are already licensed by ODA because of other activities that they do (i.e. seafood retail sales or seafood processing) while other dealers are not licensed and are not currently required to have an ODA license.

DRAFT