

Michael Talbot
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Our Ref:

Your Ref: FSH 012

29th August 2008

Dear Michael

Long Term Classification of Live Bivalve Mollusc Production Areas: Review

I am responding to your letter of 30 July 2008 seeking views on implementation of the long term classification system (LTC) for live bivalve mollusc production areas in England and Wales. When implemented in May 2006, the FSA indicated that after two years a review of the system would be undertaken. FSA is now consulting with those involved for their views on improving the system (Annex A) and feedback on some proposals developed during an interim review in 2007 (Annex B).

Our response to the questions are as follows:

Annex A - Canvassing Views

1. *Where Local Action Groups (LAGs) and Local Action Plans (LAPs) were used for alerts have they helped to resolve action states and, if so, how? Were any shortcomings identified?*

Seafish has no information to be able to comment on this.

2. *Where do you think improvements or refinements to the LTC system could be made? When discussing LAGs and LAPs please indicate the difficulties encountered and any proposed changes you feel could improve them.*

Seafish has no information to be able to comment on this.

3. *Were there any pollution incidents in your area where handling would have benefited from having in place some or all of the elements in the LTC system?*

Seafish is aware of pollution incidents that have not as yet had formal LAGs set up at the local level, yet where industry has suffered major economic losses eg Conwy mussels. A further promotion of the benefits of LAGs is needed in harvesting areas not yet covered.

4. *LAGs consist of a number of members. Do you think the number of members and their roles are appropriate and sufficiently defined? You may wish to highlight any areas of conflict, uncertainty or duplication.*

The inclusion of members from the local agriculture and water industries in LAGs is critical. Also, there are insufficient resources in Seafish for our organisation to be able to take an active part in each LAG. However, we have one specific member of staff who provides generic information to industry as a whole and who may be available from time to time to offer industry advice and support at a the local level.

5. *Would you consider induction material on LTC for new enforcement officers useful? If so please indicate what you think it should contain.*

Yes, induction material for new enforcement officers and those rotating into roles that cover bivalve molluscs would be extremely useful. Indeed, Seafish has already provided this sort of technical advice in shellfish handling and purification courses and will continue to do so. There is the opportunity for the FSA to provide appropriate material that could be included in the training packages that we provide both to EHOs and our courses for industry members.

6. *'Action states' may occur infrequently such that procedures may not be well rehearsed or may become out dated. Do you consider that the current frequency of revision and email notification testing is sufficient to support efficient operation of the LAP?*

The provision of a Good Manufacturing Practice Guidelines (GMPG) that covers LAGs, LPAs and Action States would be a good model to distribute to industry and associated stakeholders. This would need to be updated with recent best practice case studies and/or a newsletter once or twice per year. This may be in a similar format to the FSA-approved Seafish GMPG Live Bivalves Workbook (<http://www.seafish.org/sea/aquaculture.asp?p=ec339>).

7. *Has the FSA published sufficient guidance to facilitate efficient implementation and operation the LTC system? Please identify any shortcomings and indicate where improvements can be made.*

Seafish is unable to comment on this.

8. *Do you feel it would be useful to extend the principles of the LTC system to other beds? Do you foresee any problems with this approach?*

Yes, provided there is sufficient consultation with the industry at the local level.

ANNEX B - Current Proposals

1. *Local Food Authorities to ensure new enforcement officers are familiar with the principles of LTC and contingencies under the Local Action Plan.*

This should also include enforcement officers rotated into positions with responsibilities for live bivalve molluscs.

2. *To develop LAPs for all classified LBM harvesting areas in England and Wales, regardless of LTC status.*

This should only take place where there is local active industry participation and agreement.

3. *Local Food Authorities to notify the FSA should a lack of relevant information or other obstacles inhibit investigations or the efficient operation of the LAP.*

This is good common sense and Seafish supports this.

4. *Local Food Authorities to provide written assessments of 1st and 2nd tier investigations. FSA and CEFAS to provide appropriate guidance.*

This guidance from FSA and CEFAS should be transparent and made available to those industry members that it will impact on.

5. *CEFAS to review the qualifying criteria of 90% for compliance under the LTC system. LFAs to be informed of the significance of any modifications.*

While Seafish would welcome this review, we must bear in mind the tenuous commercial positions of many businesses in this sector. Therefore, clear and transparent consultation and feedback from industry and Seafish should be sought at the outset and certainly prior to any decision(s) being made.

Yours sincerely (by e-mail)

Peter Wilson

A handwritten signature in black ink, appearing to read 'P. Wilson', with a stylized flourish at the end.

Seafish Legislation Manager