

Shellfish Import Advisory Committee meeting

April 30, 2018

10a-noon

WDFW Port Orchard office
450 Port Orchard Blvd Suite 290
Port Orchard, WA
(Conference room located on top floor)

In attendance: Diane Cooper, Ralph Elston, Bob Sizemore, Brady Blake, Camille Speck, Chris Eardley, and David Fyfe; By phone: Tim Carpenter, Carolyn Friedman; Not in attendance: (Brian Joseph).

Committee Infrastructure:

Meeting frequency: The Committee agreed that meeting for the sake of meeting is less desirable than meeting according to emergent issues or ongoing concerns. WDFW will call meetings to order as needed and in response to requests from Committee members. Between meetings, the Committee will communicate through email and other channels as desired. Future meetings may be in-person or via conference call/video call. Other venues available for meeting include the Point No Point Treaty Council offices, the Seattle Aquarium, the NOAA Manchester facility, and the WDFW Port Townsend office.

Charter: Chris is working on a draft charter now and will share with the document with group members for input. The SIACWDFW website will host meeting agenda and notes. Committee Member are names will be listed on the website and members agree to review content before it is posted. Transparency is a goal and general Committee discussion summaries and conclusions will be posted following meetings. Future meetings will be about 2-3 hours. WDFW will provide an agenda and materials prior to meetings.

Raising Issues, interacting with constituents, and Information sharing: Different stakeholders may need different messaging. Growers will go through PCSGA and the industry rep (Diane), though this may not capture all segments of the industry. All constituents can also go through WDFW reps (Bob, Chris, and Brady). WDFW will try to be present at all shellfish industry meetings (PCSGA, SeaGrant and beyond) and will make special efforts to reach as much of the industry as possible, including via other agencies. WDFW will also seek opportunities with other stakeholder groups.

WDFW can make use of the “issue paper/straw dog” model to share information with the Committee and beyond (web posting or by email); the Committee and WDFW should consider producing information in other languages (esp. Spanish). The public aquaria rep (Tim) can provide access to other aquaria community members in Washington and throughout the West Coast. David is in regular communication with tribes, and will provide updates to tribes following meetings. The Committee may make use of guest speakers on certain issues. The public may attend meetings but agenda items need to be approved in advance per past Committee practices.

Where to focus improvements in WDFW Shellfish Disease Control program?

Response to Equivalence Determination Regarding the European Union Food Safety Control System for Raw Bivalve Molluscan Shellfish ISCC (Interstate Shellfish Sanitation Conference): USFDA has been working on reciprocal shipping of live shellfish between EU and USA and this has been approved, with a comment period in the Federal Register currently open (until May 23). The entire focus of vetting and approving standards related to import approval has been on human health, not shellfish disease.

Shellfish coming from Europe may be exposed to local waters and this is a concern from the potential shellfish disease vector standpoint.

WDFW was not party to the action/conversation; this absence could be raised so WDFW can be included in future discussions. The Committee discussed how to mitigate risk, including whether testing is practical and what it might look like (probably difficult), and how it might be focused. WDFW currently has regulatory authority limitations regarding shellfish imports intended for human consumption (“market ready”). The Committee suggested consulting with USDA, WDA, as well as submitting a letter to the ISSC to log the concerns of WDFW. The best immediate course may be to invest in educating consumers and purveyors—increasing awareness of the disease risk through contamination of state waters. Some ideas to this effect might include communicating with trade associations (restaurants) and product labelling (some shellfish companies have proactively already, but efforts to label could be expanded).

Improve permitting process

This is one issue of concern commonly raised by the shellfish industry due in part to permitting delays this year. The industry is seeking to avoid interruptions to business. WDFW would do better to make quicker decisions and invest in making decision-making more predictable. WDFW has taken steps to speed up the process: including submitting the first draft of an automated permitting system; WDFW has explored staggered renewal dates. WDFW is committed to improving the process and seeks to trim time off the turnaround. The permit signature process in WDFW has changed; it was informally delegated prior to 2017, but is now assigned to the Assistant Director.

Some suggestions to improve the process included:

- Consider building in a grace period if testing is required rather than staggering application dates; +/- one month bracket with a firm renewal/testing deadline was suggested. For example, consider when seed is available for testing and then bracket the deadline around that availability.
- Develop a program with a longer permit life. This strategy may come with more comprehensive and enduring requirements such as facility inspection, facilities plan of operations standards, etc., but would result in a longer permit period (multiple years in lieu of an annual permit). Annual testing would still be required for longer term permits. This may be an option for some producers and/or a cooperative between smaller growers. This strategy aligns better with efforts at the federal level.

Denman Island Disease – classification and management

The Committee discussed the status of a management decision on the Denman Island Disease (DID) issue. Currently there is a higher prevalence of DID-positive animals in Humboldt Bay Kumamoto oysters than historically—likely driven by recent seasonal environmental conditions. WDFW discussed the complexity of the situation, including data limitations, incomplete disease classification work that was started in 2007 (to classify DID as Class B shellfish disease), and the desire to make the right decision vs. the quick one. At the crux of the issue is the state’s desire to continue to manage Willapa Bay as free from DID in support of best available information. WDFW outlined how California manages DID (as ubiquitous and of low concern) and how Canada handles DID (disease of concern). The pathogen was apparently sequenced and DID in California may be the same as that found in Puget Sound and elsewhere. Management options were outlined. The Committee recommended managing differently for *C. gigas* (Pacific oyster) and *C. sikamea* (Kumamoto). DID appears to be primarily an issue for Kumamoto oysters, and perhaps management should focus accordingly. Based on this and that *C. gigas* from

Humboldt has tested negative for DID, Humboldt imports of *C. gigas* seed should be permitted. This is also a matter of consistency between permits.

For Kumamoto oysters, risk is higher and restrictions might be justified. There is also a need to account for uncertainty. For example, DID may not be an issue now, but with changing conditions it may be of significant concern in the future. In recent research, Kumamotos and the progeny of selectively-bred Willapa *C. gigas* stock show some resilience against more serious diseases, so there is additional justification to protect Willapa and Kumamoto stocks here.

The Committee also discussed challenges related to moving oysters from DID-positive Puget Sound to DID-negative Willapa Bay. One suggestion was to perform limited testing of shellstock from Puget Sound, using the accepted inter-state sample size of 60 seed, and select sites based on source locations and use testing. Testing would be used to better inform transfer decision making. Previous testing history has not indicated any positive PCR or histology for DID in Pacific oyster seed from Oakland Bay, Dabob Bay, and Quilcene Bay source locations. Summarized testing data from industry may be available for WDFW review. Previous WDFW work showed DID-positive prevalence of about 5-10% of 3-4 year-old on-bottom stored Pacific oyster broodstock. While DID is present in Puget Sound, it is only in low-levels and likely more common in older animals. Further, WDFW might consider that the time of year and the life history stage as well as the species (in the case of *C. gigas*) may limit risk of DID occurrence in Puget Sound nursery oysters.

Finally, the Committee discussed some constituents' desire for more predictability and clarity. The WDFW response to the DID issue was reflected the process as inconsistent, unclear, and slow. It was stated that a rapid and definitive decision on 'approval' or 'denial' of a permit allowed for recourse to be sought as necessary in the case of denial. Lack of clarity is more harmful than a clear denial of a permit.

- **Recommendation of the committee:** There is low risk of DID transfer with negative-testing Pacific seed from Humboldt Bay to Willapa Bay. Based on negative test results from Humboldt the DID transfer risk is low with Pacific oysters but risk greater with Kumamotos.
 - Humboldt to WA, *C. gigas* Pacific oysters: Approve transfer based on negative test results, health history documentation
 - Humboldt to WA *C. sikamea*: higher risk, manage as needed but make a definitive decision and allow for administrative processes to occur.

Closing business: WDFW will make efforts to connect with representatives who could not attend, as well as develop additional participation options (Skype). WDFW will distribute an OsHV-1 species profile draft for the Invasive Species Council website for Committee review. Follow-up with the Committee will also include future meeting plans, draft meeting summary, and draft charter. Issue papers on other agenda items may be distributed as desired.