

Congress of the United States
Washington, DC 20510

March 15, 2010

The Honorable Gene L. Dodaro
Acting Comptroller General
Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Dodaro:

We are writing in reference to the recent request of the Honorable Rosa L. DeLauro that the Government Accountability Office (GAO) conduct an audit of the Interstate Shellfish Sanitation Conference's (ISSC) *Vibrio vulnificus* (*V.v.*) risk management plan. We do support the basic premise of the request: "...to determine whether this risk management plan...is effective in reducing illnesses and deaths due to oysters with the *V.v.* bacteria."

However, in addition to this question we would also ask that you consider additional factors and issues associated with ISSC's efforts to reduce illnesses associated with *V.v.*. Firstly, we would ask that your evaluation consider both ISSC's and the U.S. Food & Drug Administration's (FDA) current and proposed approaches to controlling *V.v.* illness versus that of the FDA for controlling illnesses associated with various food allergans and for raw produce.

We would also ask that your audit consider the public's acceptance of post harvest processed oysters as an exclusive alternative to consuming traditional raw oysters. Integral in this should be consideration of the additional costs associated with post harvest processing and the degree to which that cost is transferred to the ultimate consumer, as well as a complete analysis of all job losses in the Gulf Coast region that may occur if FDA implements mandatory post-harvest processing.

In conclusion, we believe that our states shellfish control authorities have the appropriate systems in place to comply with the requirements established in the National Shellfish Sanitation Program (NSSP), including the resources to enforce time and temperature controls, to gather the appropriate epidemiological data, to adequately oversee compliance with appropriate controls, to evaluate compliance by oyster harvesters, processors and distributors, and to provide sufficient data for evaluating the effectiveness of time and temperature controls by the end of the summer harvest season in 2010.

Accordingly, we respectfully request that you include these items in any audit that you undertake in this regard. We thank you for your most valuable assistance in this matter and look forward to hearing from you as to how you intend to proceed with this audit.

Sincerely,



Senator Mary Landrieu



Senator Thad Cochran



Senator George LeMieux



Senator Bill Nelson




Senator David Vitter



Senator Roger Wicker



Congressman Rodney Alexander



Congressman Brian Baird



Congressman Jo Bonner



Congressman Charles Boustany



Congressman Allen Boyd



Congressman Joseph Cao



Congressman Bill Cassidy



Congressman Charlie Melancon



Congressman Pete Olson



Congressman Ron Paul



Congressman Steve Scalise



Congressman Gene Taylor