Investigation and Results Related to the Geoduck Shipment
Linked to the Shellfish Import Ban Imposed by China

December 13, 2013

**Background Information:** Our Washington State Geoduck Clam Biotoxin Monitoring Plan:

**Before Geoduck are Allowed to be Harvested:**
- Shellfish businesses take 3 geoducks from the area they want to harvest from to have them analyzed for the presence of paralytic shellfish poison (PSP).
- **The Washington State Department of Health (DOH)’s Public Health Lab (PHL) tests the combined viscera of the 3 geoducks from each harvest area using the PSP in Shellfish Mouse Bioassay Method.**
  - Acceptable results are <80µg/100g of tissue.
  - The PHL notifies the DOH Office of Shellfish and Water Protection (OSWP) of results and opens or closes shellfish harvesting in the area based on the test results.
  - Harvest cannot begin before OSWP receives the results and shares them with the shellfish harvest business.

**Before Geoduck or Other Shellfish are Allowed to be Exported:**
Shellfish companies must be licensed by the Washington State Department of Health and be approved to export.

**Details of our Initial Investigation:**
Using information from the National Oceanic and Atmospheric Administration (NOAA)’s health certificate along with records obtained from King Ocean Seafood Inc. (Washington Certification Number WA-1613-SS) and its suppliers, a team of investigators identified the shipment of geoduck as being harvested from the state owned Geoduck Tract #10380, Redondo Poverty Bay, Washington, on 10/5/13. This tract along with all other state owned geoduck tracts are tested for PSP levels prior to opening for harvest. The table below summarizes the PSP results from mid September through mid October 2013.

<table>
<thead>
<tr>
<th>Collect Date</th>
<th>Site Name</th>
<th>Species</th>
<th>Tissue</th>
<th>Org</th>
<th>PSP Result (µg/100g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/24/2013</td>
<td>Redondo Tract #10380</td>
<td>Geoduck</td>
<td>Gut</td>
<td>Puyallup Tribe of Indians</td>
<td>42</td>
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<td>10/17/2013</td>
<td>Redondo Tract #10380</td>
<td>Geoduck</td>
<td>Gut</td>
<td>Puyallup Tribe of Indians</td>
<td>&lt;38</td>
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<td>10/9/2013</td>
<td>Redondo Tract #10380</td>
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<td>Gut</td>
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<td>Gut</td>
<td>Puyallup Tribe of Indians</td>
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<td>9/26/2013</td>
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<td>Geoduck</td>
<td>Gut</td>
<td>Puyallup Tribe of Indians</td>
<td>48</td>
</tr>
</tbody>
</table>
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December 13, 2013

Facility Investigation Results
12/12/13 Investigation of: King Ocean Seafood Inc. WA-1613-SS
Alki Products LLC, WA-1612-SS

Investigation Team
Washington State Department of Health Inspector, Cari Franz-West
Washington State Department of Health Inspector, Cathy Barker
Washington State Department of Health Inspector - Shellfish Protection Supervisor, Darin Klein
NOAA Supervisory Consumer Safety Officer, Milton Chiu
NOAA Supervisory Consumer Safety Officer, Christopher Pratt

NOAA Certificate Information
- The shipment quantities on the NOAA certificate showed 30 boxes 682 kg (Approx. 1,503lbs and 8.844oz.) with a production date of “October 2013.”
- The consignee listed on the certificate was listed as Saint Choice Limited RM307, 3/F, Lincoln Center 20 Yip Fung Street, Fanling, NT, Hong Kong, Hong Kong
- Washington State certificate was issued from Seattle.
- According to my discussion with NOAA Supervisory Consumer Safety Officer Milton Chiu and Christopher Pratt, who both attended our inspection at King Ocean facilities, the company requests a certificate of NOAA prior to expected harvest with estimates of quantity and weight.
- Washington State Department of Health has not issued Export Certificates to King Ocean WA-1613-SS since May 2013.

Harvest Information
- Based on NOAA’s export certificate application process, it is most likely that the implicated lot was harvested on 10/5/13.
- Investigation showed likely harvest area to be Poverty Bay WA, DNR Tract #10380 Redondo, harvest date 10/5/13. Tract was open for harvest.
- Document titled, “Puyallup Tribe of Indians Geoduck Harvest and Sales” obtained from Alki Products LLC, WA-1612-SS, indicated 385lbs (174kg 633.05g ) was harvested from Poverty Bay, WA DNR Tract #10380 Redondo on 10/5/13 from the vessel “NITA”.
- Document titled, “Treaty Indian Fish Ticket” # JJ710552 confirms harvest and sale of 385lbs (174kg 633.05g) of geoduck on 10/5/13 to Alki Products LLC, WA1612-SS.
Distribution Information

- Purchase and sales records from Alki Products LLC, WA-1612-SS, confirm 385 lbs (174kg 633.05g) of geoduck were purchased from Puyallup Tribe of Indians (Treaty Indian Fish Ticket” # JJ710552) on 10/5/13 and sold to King Ocean.
- Invoice from Alki Products LLC shows 8 cases, 385 lbs (174kg 633.05g) of geoduck was sold to King Ocean Seafood Inc. (WA-1613-SS) on 10/5/13.
- Document titled, “King Ocean Seafood Inc. Geoduck Clam Receiving Report” confirms 385lbs (174kg 633.05g) of geoduck were received from Alki Products LLC on 10/5/13 at 6:00PM
- Document titled, “King Ocean Seafood Inc. Shellstock Shipping Report” confirms 385 lbs (174kg 633.05g) of geoduck Lot # 146 were shipped.
- Document titled, “Air Waybill” from Majestic Superior Logistics, Inc. was obtained to confirm 429 lbs. (195.00kg) was shipped to consignee Saint Choice Limited RM307, Hong Kong on 10/6/13.

On site Investigation Conclusions
Based on the information contained on NOAA issued Certificate#CN.3028.132765.13-HA issued to King Ocean WA-1613-SS on 10/4/13 and our investigation of King Ocean and Alki Products LLC, WA-1612-SS, we are confident the product identified on the NOAA Certificate came from the Poverty Bay WA, DNR Tract #10380 Redondo.

Both company’s records were maintained properly and we were able to trace back the product in question to the particular growing area.

Test Results Conclusions
The weekly biotoxin test results from geoducks taken from Poverty Bay WA, DNR Tract #10380 Redondo, during the timeframe indicated on the correspondence from China demonstrated PSP results below the regulatory level of 80µg/100g.