

**MEMORANDUM**

**DATE:** July 7, 1998

**FROM:** Robert E. Croonenberghs, PhD, Director  
Division of Shellfish Sanitation

**THROUGH:** Eric H. Bartsch, PE, Director  
Office of Water Programs

**SUBJECT:** Plants - Policy - Certification - Hard Clams as Bait

**Introduction**

Hard clams are being used more and more as bait, not only for black drum, but also as crab bait. There has always been a bait market for hard clams that operated outside of the NSSP, whether we like it or not. However, hard clams handled in DSS certified facilities will have to conform with the NSSP. In order to provide adequate public health safeguards, we cannot have certified and uncertified shellfish in a certified plant.

**Policy**

All bivalve molluscan shellfish that are being held or processed within certified facilities will have to conform with the requirements of the NSSP, this includes HACCP regulations.

However, when we are in the field and see clams on a dock that are obviously intended for bait purposes, we will not enforce NSSP requirements at this time. If the sale of hard clams as bait begins to pose potential problems with the supply for human consumption, then we may have to reconsider this policy.

Whelks (conchs) are not a part of the NSSP, and when sold as bait do not need to be certified.