

SEAFOOD SAFETY SAVVY: A HACCP UPDATE

from the Connecticut Sea Grant College Program, University of Connecticut
and the Cooperative Extension & Sea Grant Programs, University of Rhode Island

Issue 10 March 2005

A Message from the Editors:

Welcome to our 10th issue! We hope you continue to find these periodic updates on HACCP and seafood safety useful. Archived issues of this newsletter are available on the internet at <www.seagrant.uconn.edu/seafood.htm#seafood>.

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(Above) Nancy Balcom, CT Sea Grant, assists participants in developing their model hazard analysis and HACCP plan, during a standard HACCP training course held during 2004 in Groton, CT.



Additional Training Course Offerings

TENTATIVE COURSE DATES

Seafood HACCP Training Course
May 9-11, 2005 Narragansett RI

Shellfish HACCP Training Course
April/May 2005 (TBD)

Sanitation Control Procedures Course
fall 2005

All classes must have a minimum number of registered participants to be held. For more information, please contact Nancy or Lori.

Country of Origin Labeling Program

In our last issue, we discussed the mandatory Country of Origin Labeling (COOL), which requires retailers to inform consumers of the country of origin for all covered commodities. A retailer is defined as anyone who buys and sells produce solely for retail with a cumulative value during the calendar year of more than \$230,000. Therefore, COOL applies to you if you are selling to such a retail operation. They need this information and they have to get it from you!

The final USDA rule has some changes of which you should be aware. The regulation enforcement

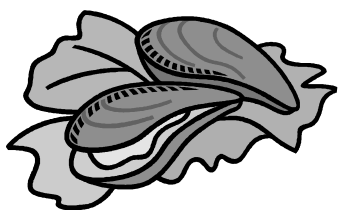
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date for farm-raised fish and shellfish, as well as wild-caught fish and shellfish, is April 5, 2005.

The changes from our last issue largely have to do with the products that are covered by COOL. Covered commodities are excluded if they are considered a processed food item. What does this mean? The seafood item must have character that is **different** from that of the covered commodity, has undergone "substantial transformation" and/or has been combined substantially with other food components. Examples of processes that are excluded from mandatory COOL include cooking, canning, curing, smoking, and restructuring. Food products that are excluded include those that are breaded, combined with tomato sauce, or stuffed. Other excluded products are fish sticks, surimi, sushi, crab salad, and clam chowder.

If the seafood product was imported from another country (X) and substantially transformed in the United States, it must be labeled as: "From country X, processed in the United States". Blended or mixed products- a mix of fish or shellfish from different countries - must be labeled. The applicable label in this case would identify the source countries of the mixed products *by order of prominence of weight*.

REMEMBER: Your products can *only* be labeled as products of the United States if they were harvested in U.S. waters or by a U.S. flagship and have **NOT** undergone substantial transformation outside the U.S.



Food Security Update

As part of FDA's food security regulations, you are already well aware of the requirements for registration of food facilities and prior notice of imported food shipments. Final food bioterrorism regulations have now been issued for administrative detention, and establishment and maintenance of

records. These are the last two of the four required regulations we described in previous newsletters.

The regulation on administrative detention strengthens FDA's power to detain food products when there is credible evidence or information that a threat of serious health consequences or death to humans or animals exists. USDA-regulated products are not included under this regulation.

The required records must identify the immediate previous source of the food received, as well as the immediate subsequent recipient of the food. Record retention for human food ranges from six months to two years, depending on the shelf life of the food. Records for animal food, including pet food, must be retained for one year. Record retention for transporters of all types of food is one year.

Detailed information can be found at <www.cfsan.fda.gov>. Click on "Bioterrorism Act of 2002" under the section titled **National Food Safety Programs**.

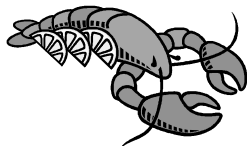


New FDA Guidance on EU Export Certificates for Seafood

Anyone exporting to the EU might want to be aware of two new FDA guidance documents regarding EU Export Certificates. (Go to <www.cfsan.fda.gov>, click on "Guidance Documents", and then select "Seafood".) Since 1993, the EU has required that all shipments of fish and fishery products shipped to the EU be accompanied by an EU Export Certificate. This certificate, signed by the FDA, attests that the products were produced in accordance with a HACCP-based system that is at least equivalent to the EU system of control. In 1996, the EU also began requiring a different certificate specifically for shipments of live molluscan shellfish.

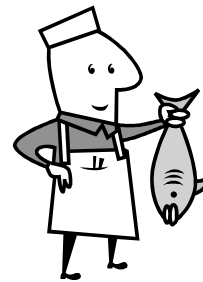
Now the FDA has issued two draft guidance documents relating to certification of seafood for the EU. The first document, titled "Certification of Fish and Fishery Products for Export to the EU and European Free Trade Association", outlines protocols for industry which clarify and ensure uniformity in the procedures used to issue certificates. It includes detailed information on eligibility for and inclusion on EU export certificate lists, and guidance for obtaining completed EU export certificates.

The second document is titled "Proposed Referral Program from the FDA to the NOAA Seafood Inspection Program (SIP) for the Certification of Live and Perishable Fish and Fishery Products for Export to the EU and European Free Trade Association". The demand for EU Export Certificates has risen dramatically in recent years, causing resource allocation problems for the FDA. The increased demand in combination with limited resources, has created a problem for live and perishable fish and fishery products. To expedite the exportation of shelf life-sensitive products, the FDA intends to cease to issue EU Export Certificates for these products and refer all requests to NOAA SIP, for a 24-month pilot period. This service is offered for a fee by NOAA. FDA will provide guidance and oversight to NOAA SIP with regard to the EU Export Certificates issued as part of this referral program.



Other Food Regulations for Processors

For those of you engaged in processing value-added seafood products, you need to be aware of the Food Allergen Labeling and Consumer Protection Act of 2004 as well as the addition of *trans* fatty acid declarations on the nutritional labels. The latter can be found at <www.cfsan.fda.gov>; click on "Guidance Documents", and select "Food Labeling." The former can be located at <www.cfsan.fda.gov/~dms/alrgact.html>.



Heads Up!

A newly revised edition of the *Fish and Fishery Products Hazards and Control Guide* is on the horizon. We will let you know when it becomes available, so that you can obtain a copy and have access to the latest version of the best-available guidance on fish and fishery products hazards and controls.