

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

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A Message from the Editors:

Happy Holidays to you all! We hope you continue to find these periodic updates on HACCP and seafood safety useful - your comments and suggestions are always welcome. Archived issues of this newsletter are available at the following website:

<www.seagrant.uconn.edu/seafood.htm#seafood>.

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Attention Shellfish Processors

It has come to our attention that some individuals in the shellfish business have still not taken a good look at the National Shellfish Sanitation Program Guide for the Control of Molluscan Shellfish 2003, AKA "The Model Ordinance". The Ordinance is a document with which all shellfish growers, harvesters, processors and dealers should be very familiar. It can be found at the website <<http://www.cfsan.fda.gov/~ear/nss2-toc.html>>. According to the website, the Model Ordinance "represents the FDA's current thinking on the safe and sanitary control of the growing, processing, and shipping of molluscan



Additional Training Course Offerings

COURSE DATES

Seafood HACCP Training Course
May 15, 16 & 18, 2006 Narragansett RI

Segment Two Internet Course Follow-up
May 2, 2006 Narragansett RI

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

shellfish for human consumption." As you know (or should know), the NSSP is a Federal/States cooperative arrangement for regulation of the raw molluscan shellfish industry. Therefore, state regulatory authorities are responsible for the inspection and enforcement of all aspects of the Model Ordinance, including the shellfish HACCP program. It is your responsibility to be familiar with the contents of the Model Ordinance that applies to you. Detailed HACCP information can be found in the document as it relates to various processing aspects (e.g., harvesting, holding, transporting, shucking) of the shellfish industry. We encourage all members of the shellfish industry to review the contents of this document on-line and download and print the sections that apply to your operation.

FDA's Evaluation of the Seafood HACCP Program for 2002-2003

This evaluation covers the status of domestic and international seafood processors and importers for fiscal years 2002 and 2003, operating under FDA's HACCP program. This is the third evaluation that FDA has undertaken since the implementation of its HACCP regulation. FDA uses these evaluations to make changes in compliance programs and to focus inspection and training efforts on certain industry segments or specific food safety hazards. Therefore, over the years FDA's inspection coverage has shifted to focus more on problematic firms and those seafood commodities that have higher risk hazards (e.g., histamine, ready-to-eat products).

These efforts have paid off as the domestic industry has made steady improvements over the years. As expected, the rate of progress has tapered off compared to the early years of the program. However, importers of foreign fish and fishery products still have much progress left to make, particularly in the elements of implementation and documentation of "affirmative steps". Importers of scombroid species have had, and continue to have, a low success rate, which may be due to a lack of understanding of the hazard and how it can be controlled.

Following any HACCP inspection, firms are classified by the FDA as NAI - No Action Indicated, VAI - Voluntary Action Indicated, or OAI - Official Action Indicated. Traditionally, the FDA considers a firm to be "in compliance" when the most recent inspection results in a "NAI" or "VAI" classification.

What does this mean? Based on the above FDA classification system, the most recent evaluation indicates that approximately 91% of firms were "in compliance" (NAI or VAI). They either had a HACCP plan as required or didn't need a plan. This is a significant increase over the 85% compliance rate of 2001. However, in FY2003

there was a slight increase in firms that needed a HACCP plan but did not have one at the time of inspection.

Finally, while steady progress has been made in the industry adoption of sanitation controls (including all GMPs, all sanitation monitoring and record-keeping), there is only a 54% success rate of total compliance with this very strict standard. (Any sanitation infraction or monitoring deficiency causes a firm to be marked "deficient".) This rate of 54% does represent a 100% improvement over the baseline year of FY1998!

This report contains a LOT of information, rating all individual HACCP program elements for the domestic and foreign industries (compliance for the seafood industry overall and compliance for individual seafood hazards). If you're interested in reviewing this report, it can be found at <<http://www.cfsan.fda.gov/~comm/seaeval3.html>>.

Based on the evaluation, the following recommendations were made, to:

- continue to prioritize all manufacturers of high risk fishery products, particularly processors of scombroid species and cooked, ready-to-eat products, for annual inspection;
- prioritize processors and importers of aquaculture products for increased inspection and training;
- issue the 4th edition of the *Fish and Fishery Products Hazards and Control Guidance* to facilitate compliance by processors of scombroid products; and
- complete an evaluation of firms that need a HACCP plan but still do not have one and determine what follow-up action is needed to ensure compliance on this issue.

GMP Changes are A' Coming

FDA has established a working group to modernize the Food Current Good Manufacturing Practices (CGMP). This working

group identified seven areas that represented an opportunity to modernize the current regulation and have significant impact on ensuring the safety of food. The areas include:

1) requiring appropriate **training** for supervisors and workers in food safety and personal hygiene and maintain records of this training

2) requiring food processing establishments that produce foods containing any of the 8 major food allergens to have a **food allergen control plan**. This plan would address 6 key elements (training, segregation, validation, prevention of cross-contamination, labeling use & control and supplier control)

3) requiring a **Listeria monocytogenes control program** for processors of ready-to-eat foods, that includes microbiological monitoring as appropriate, and records that judge the effectiveness of the program

4) requiring food processors develop and maintain **written sanitation procedures**

5) studying the **application of certain CGMPs to agricultural operations**, engaged solely in harvesting, storage, or distribution of raw agricultural commodities

6) requiring that food processors **maintain certain critical records** available for review and evaluation by FDA to confirm that the firm is operating in compliance with the CGMP regulation

7) obtaining further information regarding **time-temperature relationships** in the form of microbial growth models for incorporation into regulations or guidance for proper refrigerated storage or hot holding.

This is still a work in progress. The full report can be accessed at <<http://www.cfsan.fda.gov/~dms/cgmps3.html>>. The working group is seeking comments regarding this document.

Current FDA Activities Related to *Listeria monocytogenes*

As you know, *Listeria monocytogenes* has been a problem in ready-to-eat products for many years. FDA is formulating an Action Plan based on risk assessment studies. If you wish to review the current FDA activities related to this plan, go to <<http://www.foodsafety.gov/~dms/lmr2pla2.html>>.

This plan will cover *Listeria* issues in all food commodities. Seafood processors of ready-to-eat seafood products should already be aware of the problems associated with *Listeria*, and would be wise to look at this action plan.

New Federal Health Certificate for the Export of Live Crustaceans, Finfish, Mollusks and Related Products

The National Marine Fisheries Service (NOAA, Dept. of Commerce); the Fish and Wildlife Service (Dept. of Interior); and the Animal and Plant Health Inspection Service (USDA) all have legal authorities and responsibilities related to aquatic animal health in the U.S. The three agencies have entered into a MOU delineating their respective responsibilities in the issuance of health certificates for the export of live aquatic animals and animal products. The new certificate bears the three agency logos and can be used by any of the agencies when issuing health certificates for the export of live crustaceans, finfish, mollusks, and their related products from the U.S.

Information required for the certificate includes species name, age and weights, whether it is cultured or wild stock, place of origin, country of destination, and date/method of transport. The use of this multi-agency certificate should make the aquatic export certification process less confusing for those requiring this service.

Food Allergen Labeling and Consumer Protection Act of 2004

This Act was announced in our last newsletter. If you want or need additional information, please look at the Question and Answer document found at the following website <<http://www.cfsan.fda.gov/~dms/alrgqa.html>>. The Act can also be accessed through this website.

All domestically manufactured and imported packaged foods regulated by the Food, Drug and Cosmetic Act labeled on or after January 1, 2006 must comply with the food allergen labeling requirements. The major food allergens of concern are *milk, eggs, fish, crustacean shellfish, tree nuts, wheat, peanuts, and soybeans*. The regulation requires that the species must be declared for fish and crustaceans, and the specific nut type for tree nuts. The new labeling will make it clearer to consumers what type of allergen is in the product.

Transportation Equity Act 2005 / Sanitary Food Transportation

Good news! On October 10, 2005, President Bush signed the Safe, Accountable, Flexible and Efficient Transportation Act of 2005 (P.L. 109-59). This Act requires the U.S. Secretary of Health and Human Services to ensure that food is not adulterated during transportation *by establishing* sanitary transportation practices and providing for access to food transportation records. The Secretary shall, by regulation, require any persons engaged in the transportation of food to use sanitary practices as prescribed. More to come!

Heads Up (Still)!

We expect the newest edition of the *Fish and Fishery Products Hazards and Control Guide* to be issued sometime in 2006. We'll let you know when it becomes available so that you can have access to the latest best-available guidance on fish and fishery products hazards and controls.