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:

It has been a long time since the last issue of this newsletter! We hope this edition finds you well and busy, in anticipation of the holidays.

Please note that the next seafood HACCP training opportunities we are offering will be held in Rhode Island next spring. Once the dates are set, we will mail out a notice, but you can also contact Lori directly for more information. Another way to find out when a class is being offered is to check the training calendar on the Internet site **(http://seafood.ucdavis.edu/events.html#section3).** Anyone wishing to take the training via the Internet should sign up directly with Cornell University at **http://seafoodhaccp.cornell.edu/.** Once the Internet course is completed, then a Segment Two class is required to complete the training.

In this issue, we provide you with a heads-up on the expected changes to the fourth edition of the Hazards Guide. When the new version is available in print sometime next spring or early summer, we will let you know so you can get one.

Back issues of this newsletter are posted at **http://www.seagrant.uconn.edu/seafood.htm#seafood.** If you get a chance, let us know whether you find this newsletter helpful. If you have suggestions to make it more useful to you, please pass them along. There's a coupon on page 4 to do just that, or you can call or email one of us. Happy Holidays!

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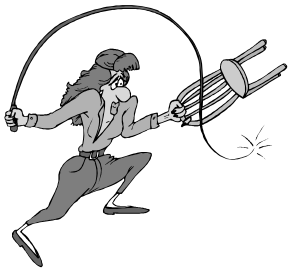

Training Courses and Workshop Offerings

HACCP TRAINING COURSES

Seafood HACCP Training Course
Narragansett RI
Spring 2008 (TBD)

Segment Two Internet Course Follow-up
Narragansett RI
Spring 2008 (TBD)

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

A L E R T:
FDA's Food Security Program

The FDA's new ALERT initiative is intended to raise the awareness of state and local government agency and industry representatives regarding food defense issues and preparedness. ALERT identifies five key points that industry and businesses can use to decrease the risk of intentional food contamination at their facility.

A - *How do you* **ASSURE** *that the supplies and ingredients you use are from safe and secure sources?*

L - *How do you* **LOOK** *after the security of the products and ingredients in your facility?*

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E - *What do you know about your* **EMPLOYEES** *and people coming in and out of your facility?*

R - *Could you provide* **REPORTS** *about the security of your products while under your control?*

T - *What do you do and whom do you notify if you have a* **THREAT** *at your facility, including suspicious behavior?*

This is guidance, but do not forget the Bioterrorism Preparedness and Response Act of 2002 (PL107-188) that details security requirements with which you do need to comply. For more information on **ALERT**, check **www.cfsan.fda.gov/alert.**

New Food Safety Initiatives from the FDA

FDA Food Protection Plan

Issued in November 2007, this Plan outlines a strategy to strengthen our food safety system that reflects recent challenges, global changes, and advances in science and technology. It provides a comprehensive strategy of prevention, intervention, and response for food safety and food defense with respect to both domestic and imported products. The Plan outlines specific actions and legislative proposals to strengthen the existing authority of the FDA, and recommends additional regulatory authority for the FDA to increase its capability to effectively address the elements of the Food Protection Plan.

Examples include empowering FDA to issue mandatory recalls if voluntary recalls are ineffective; empowering FDA to require electronic import certificates for high-risk products; requiring the renewal of facility registrations every two years; and enhanced accessibility to food records during emergencies.

The Plan will strengthen FDA's food safety role and support its on-going collaboration with other federal agencies that have a role in the safety of the nation's food supply (i.e., Centers for Disease Control and Prevention, USDA Food Safety and Inspection Service). This plan will be phased in over the coming months and integrated with the new Import Safety Strategic Framework and Action Plan.

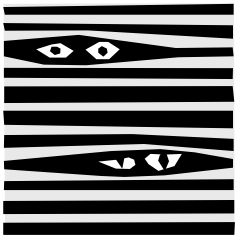
Import Safety Strategic Framework and Action Plan

The Action Plan for Import Safety provides specific short- and long-term recommendations to better protect consumers and enhance the safety of the increasing volume of imports entering the United States. It was developed by the Interagency Working Group on Import Safety and issued in November 2007.

Examples of the many recommendations include:

- create new and strengthen existing safety standards
- verify compliance of foreign producers with U.S. safety and security standards
- promote Good Importer Practices
- strengthen penalties and enforcement actions to ensure accountability
- maximize effectiveness of product recalls
- expand the use of electronic track-and-trace technolgies

For more information about the Food Protection and Import Safety Plans, go to: **www.fda.gov/oc/initiatives/advance/food/questions.html.**



A SNEAK PEEK at the Hazards and Control Guide, Part 4!

This information was presented at the Atlantic Fisheries Technology Conference, held in Portland Maine, on November 8-11, 2007 by Byron Truglio, Chief, FDA Seafood Processing Technology Policy Branch. We'd like to thank Mr. Truglio for sharing his presentation with us for use in our newsletter.

Highlights of Cross-Cutting Changes

- changes in market names
- inclusion of more aquaculture products
- additional recommendation for calibration of temperature sensing devices

• formatting changes regarding control strategies that should make it easier to follow from critical limits to verification and record-keeping

• expanded information on how to conduct a hazard analysis and prepare a HACCP plan

• more information regarding pathogenic organisms and toxins (Chapters 4 - 21)

Highlights of Specific Chapter Changes

Chapter 6 Natural Toxins

• new molluscan shellfish toxins are described

• action levels for both Caribbean and Pacific ciguatera toxins are stated

• Northern Gulf of Mexico is now considered problematic for ciguatera toxins

Chapter 7 Scombrotoxin Formation

• based on FDA studies, changes in harvest controls for scombrotoxin species are included

• more detail about appropriate sampling methodology for histamine testing

• additional recommendations for primary processor at receiving with regard to sensory evaluation, receiving temperatures, and corrective actions (includes further clarification of on-board chilling and harvest vessel records as a primary process control)

• additional information regarding receiving by secondary processor

• clarification regarding risks associated with salad products and the need for HACCP controls

Chapter 9 Environmental and Chemical Contaminants

• changes in the listing of guidance levels for heavy metals

• updated tolerance levels for heavy metals

Chapter 11 Aquaculture Drugs

• addition of new approved drugs

• explanation of "extra-label" use of drugs and list of drugs prohibited for "extra-label" use

Chapter 13 *Clostridium botulinum*

• detailed information on TTI (time-temperature integrator) performance and suitability for use as a CCP at receipt, storage, activation and application of TTI

• verification with regard to manufacture validation and testing of TTI

• TTIs are not intended to replace usual controls for product receipt and storage

• control strategies detailed for frozen product with no second barrier to growth (i.e., CCP for labeling)

NEW Chapter 16 Pathogen Survival through Cooking or Pasteurization

(Combination of Chapters 16 and 17)

• pasteurization now defined as a heat treatment applied to eliminate the most resistant pathogen of public health concern that is reasonably likely to be present in the food

• End-Point Internal Product Temperature (EPIPT) provided as an option to continuous time/temperature monitoring when processor has conducted a study to validate a 6D *Listeria monocytogenes* process.

NEW Chapter 17 Pathogen Survival through Post-Harvesting Processing to Retain Raw Product Characteristics

• this chapter provides control strategies for high hydrostatic pressure, mild heat processing, IQF with extended cold storage, and irradiation

Chapter 19 Food Allergens

• introductory material revised to reflect requirements listed in the Food Allergen Labeling and Consumer Protection Act (FALCPA)

• includes information regarding the hazard analysis for major food allergens, certain intolerance substances, and prohibited food additives

• addition of control strategies and corresponding example of HACCP for undeclared major food allergens

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Appendix 4 Pathogen Growth

- changes in Table A-1 including limiting conditions of pH, water phase salt, and water activity
- changes in Table A-2 including recommended time of exposure critical limits for Cooked Ready-to-Eat (CRE) and for Non-Cooked Ready-to-Eat products

Can you guess what the color of the cover of the 4th edition of *FDA's Fish and Fishery Products Hazards and Control Guidance* will be?

How Are We Doing?

Please take a moment and let us know how we're doing.

Do you find this periodic newsletter useful?

__ very useful __ occasionally useful __ not useful

Is the newsletter issued frequently enough?

__ yes __ no

Do you ever access the newsletter via the internet?

__ yes __ no

What types of information should we include?

_____

_____

_____

Please clip out and mail to Nancy Balcom, CT Sea Grant, 1080 Shennecossett Rd, Groton CT 06340; FAX to (860) 405-9109, or e-mail to nancy.balcom@uconn.edu.
Thank you! Your input means a lot to us!