

SEAFOOD SAFETY SAVVY: A HACCP UPDATE

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

Issue 15 September 2011
CTSG-11-08

A Message from the Editors:

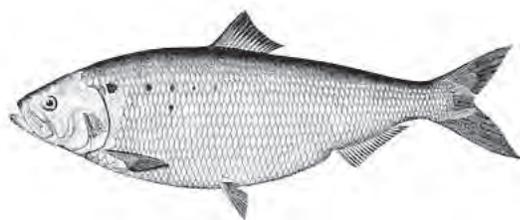
The 2011 FDA Fish and Fishery Products Hazards and Control Guide was issued in April 2011! It's really important that every company obtains the updated version, reads all relevant chapters, re-assesses and revises its HACCP plan(s) as appropriate, and then re-signs the updated plan. See "Web Sites for Key Information" for sources of the new Guide. We also cover some of the changes to the Guide later in this newsletter.

The national calendar listing available training courses can be found at: <http://seafood.ucdavis.edu/events.html#section3> OR www.afdo.org. The Internet course offered by Cornell University (<http://seafoodhaccp.cornell.edu>) must be followed by a Segment Two class.

Back issues of this newsletter are available at <http://web2.uconn.edu/seagrant/publications/fisheries/index.php>. Scroll down the page to Seafood Safety Savvy.

Don't forget that October is National Seafood Month!

Nancy and Lori



Training Courses



Seafood HACCP Training Course (3-day)
Groton CT
October 11-13, 2011

Segment Two Internet Course Follow-up
Narragansett RI
Spring 2012 (Dates TBD)

Contact Nancy Balcom (860) 405-9107

Web Sites for Key Information

2011 FDA Fish and Fishery Products Hazards and Control Guide: The new guide can be obtained for \$25 plus shipping from Florida Sea Grant by calling 800-226-1764 or going to www.ifasbooks.com.

OR you can download the Guide (it's a BIG file) from www.fda.gov/FoodGuidances (click on seafood); this site also has links to introductory videos on the new guide.

Association of Food and Drug Officials (AFDO):

www.afdo.org

Visit this site for the HACCP training calendar, links to important seafood HACCP information, and if you need a replacement HACCP training certificate.

continued on page 2

Current National Shellfish Sanitation Program (NSSP) Model Ordinance: This document, currently dated 2009, can be found at the Interstate Shellfish Sanitation Conference (ISSC) web site:
<http://www.issc.org/NSSP/Default.aspx>

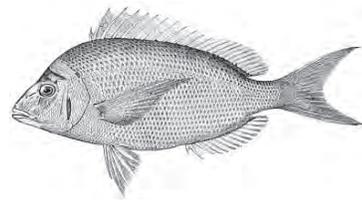
University of California - Davis Seafood Network Information Center

<http://seafood.ucdavis.edu>
At this site, find links to the *Compendium of Fish and Fishery Product Processes, Hazards, and Controls*, the training calendar for HACCP courses, and the revised Seafood HACCP Alliance training curriculum. There are also videos on Sanitation Control Procedures that can be downloaded (<http://seafood.ucdavis.edu/haccp/scpvideos.htm>).

Seafood HACCP Alliance Internet Training Course Registration Site: www.seafoodhaccp.cornell.edu

FDA Food Safety Modernization Act (FSMA):
www.fda.gov/food/foodsafety/fsma/default.htm

There are a number of components to this Act which was signed by President Obama on January 4, 2011. It covers all foods and has major sections on preventive controls, imports and third party audits. While seafood is exempt from the preventive controls section because of the FDA seafood HACCP regulation, you should take a look at the section on imports, if you are an importer, and also the section on third party audits. Go to the FSMA site and sign up for email update alerts.



NEW SEAFOOD WEB SITE LAUNCHED!!!

There's a new web site chock full of information called **Balancing the Benefits and Risks of Seafood Consumption for Healthcare Providers, Patients, and Consumers**; www.seafoodhealthfacts.org

This web site is a joint project of Oregon State University, Cornell University, and the Universities of Delaware, Rhode Island, Florida and California. It provides information on seafood choices, seafood and nutrition, seafood safety, comparing benefits and risks, and Q&As. There are downloadable brochures written for healthcare providers, or patients and consumers. The web site also links to current news features. This is definitely a great site to check out!



The screenshot shows the top portion of the website. At the top left is a logo of a fish. To its right is the main title: "Seafood Health Facts: Making Smart Choices" in large white font, followed by the subtitle "Balancing the Benefits and Risks of Seafood Consumption" and "Resources for Healthcare Providers and Patients" in smaller white font. Below this is a blue banner with the text "A joint project of Oregon State University, Cornell University, and the Universities of Delaware, Rhode Island, Florida and California." Underneath is a navigation menu with orange buttons for "Home", "Site Overview", "Seafood Choices", "Seafood & Nutrition", "Seafood Safety", "Compare Benefits & Risks", and "Seafood Q & A". The main content area features a large image of a cooked salmon fillet with a tomato slice. Below the image is a grey box with the text: "FACT: The mercury levels in salmon are often so low as to be undetectable."



A QUICK LOOK at CHANGES in the 2011 HAZARDS GUIDE

Grab your new guide and let's take a look at some of the changes. (See pg. 1 for links to FDA's introductory videos on the Guide as well.)

Yowza - it's a lot thicker! Well, it does contain ten years of updates and in this case, BIGGER IS also BETTER because the format has been modified in a way we think you find easier to follow.

Pages 3-18 highlight some of the general changes and clarifications. You will now find the mechanics of completing a HACCP plan described in Chapter 2 only. However, one of the best changes in format is that the control strategies in each chapter are now consolidated, so that you can follow each example directly from critical limits to monitoring, corrective action, verification and recordkeeping, without having to peruse several examples of critical limits, followed by several examples of monitoring, etc.

Overarching changes for temperature controls to prevent hazards associated with histamine formation, pathogen growth and *C. botulinum* toxin formation are included. Critical limits during transit are dealt with at receiving. **Cumulative** time and temperature critical limits during refrigerated storage are no longer recommended, due to the difficulty in determining how long products are in unrefrigerated conditions.

During monitoring, minor fluctuations in temperature measurements during refrigerated storage can be eliminated by immersing the sensor of the temperature recording device in a liquid (including water) that mimics the characteristics of the products.

Under verification, the difference between, and importance of, both accuracy and calibration checks is first described in Chapter 7. Guidance on how to conduct these two checks, and how often they should be done, is provided.

In Chapter 3, a fourth table (3-1) on species and process related hazards was added, which addresses the potential hazards from illegal product substitutions or misbranding. Vertebrate, invertebrate and process-related hazards are now found in Tables 3-2 to 3-4.

As always, Chapter 7, Histamine, is very involved with a large number of controls covered for a variety of handling and processing situations. However, while some things have changed, many things remain the same. These include controls at receiving (primary and secondary processors), as well as transit, processing and storage controls. You need to review carefully.

Chapters 12-15 have updates on pathogen growth and toxin formation, *C. botulinum* toxin formation, pathogenic bacterial growth and toxin formation as a result of inadequate drying, and *Staphylococcus aureus* toxin formation. Chapter 16, bacterial survival through cooking or pasteurization, is a combination of two separate chapters in the old guide.

Chapter 19 reflects changes that resulted from the Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA). FALCPA requires that any of the eight major allergens must be in the ingredient statement or in a separate "Contains..." statement. These include milk, egg, wheat, soybeans, peanuts, tree nuts, **finfish** and **crustacean shellfish**. (Molluscan shellfish (e.g., oysters, clams) are NOT part of the big eight and do not have to be labeled.) The market name of the finfish or crustacean species MUST be identified. For example, the statement should read "Contains sea bream (fish)" or "Contains blue crab,

continued on page 4

shrimp, salmon". The labeling requirement **does not** apply to harvesters unloading totes of fish or lobsters from their boats. It **does** apply to shipments of seafood by air freight or if one dealer sends totes of product to another dealer - those totes or styros must be labeled with the market name. The **BIG change** here is that FDA now expects to see labeling of finfish and crustacean shellfish as a critical control point in your HACCP plan.

In Chapter 20, Metal Inclusion, metal fragments smaller than 0.3 inches (7mm) are now identified as a potential hazard for special populations such as infants, the elderly, and surgery patients.

All in all, you need to review the Guide carefully. Start with the Tables in Chapter 3 and make sure there are no changes to the hazards associated with the species and processes you deal with. Then review carefully all of the chapters related to your identified potential hazards. Re-assess your plan, revise and re-validate it as needed to reflect any changes. The revised plan should be re-signed and dated, which will demonstrate to the FDA that you've taken the time to look over the Guide and address any changes in your plan(s).

Last But Not Least, We Have a New Training Curriculum

The Seafood HACCP Alliance took the opportunity to incorporate what the trainers have learned over the past 14 or more years of teaching HACCP courses into a new training manual and issued it simultaneously with the new Hazards Guide. The Internet course has been revised to align with the new training format as well. If you are already trained, no worries, you don't need to take it again. Trainers had to get re-certified to teach the new material. Most of the re-certification took place during the summer of 2011, so hopefully the national training calendar will indicate availability of more classes for industry members soon.

