

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:

Welcome to our second issue of *Seafood Safety Savvy*. Our goal is to keep you updated on changes in the seafood HACCP program and alert you to any new training opportunities that may be of interest. In our last issue we mentioned the SSOP course and the HACCP implementation survey. In this issue, we are providing more details. As we noted before, HACCP is an evolving process resulting in changes in the Hazards Guide and interpretation of the regulation. In this issue, we focus on the changes regarding histamine-producing species and lobsters. As always, if you need further assistance, please contact us.

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Additional Training Course Offerings

SSOP Training Course

The development of this course came in response to industry needs that became apparent during inspections. Compliance problems were found involving sanitation monitoring and sanitation monitoring records (see Box 1, page 2), among others. Therefore the National Seafood HACCP Alliance for Training and Education recently completed the development of a course and a manual entitled *Sanitation Control Procedures for Processing Fish and Fishery Products*. (This is the same group that developed the HACCP course that you all know and love.) The training follows the eight key sanitation points as required by the FDA HACCP regulation. In addition, there are examples of SSOP plans and sanitation control monitoring records that should be useful.

The course was pilot-tested on September 21 with an audience largely composed of seafood trade organization representatives. Based on their comments, the training manual has been revised. Instructor training will begin in February/March and as fearless instructors, we will be there.

We will start offering the one-day SSOP courses next spring. As with previous HACCP courses, participants will receive a certificate from AFDO upon completion of the course. As a participant in one of our previous HACCP courses, you will receive notification of the dates and locations of these courses in spring 2000, as well as registration information. If you think you'd like to attend this course, please contact us so we can gauge interest levels.

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Box 1. Summary of compliance issues documented by the FDA (Encore Course manual, 1999).

Common Compliance Problems

No written HACCP plan when one was needed
Hazard not listed in plan
Significant hazards not adequately controlled
Appropriate critical limits not listed
Adequate monitoring procedures not listed
Monitoring procedures not followed
Corrective Action in plan inadequate
Inadequate sanitation monitoring
Inadequate sanitation monitoring records

Seafood HACCP Training Courses

Planning for two three-day HACCP training courses is underway. The first course will be held in Old Lyme, Connecticut from February 16-18, 2000. The second will be offered at the beginning of April in Narragansett, Rhode Island. For more information or to get on a list for registration materials, please contact Nancy or Lori.

Other courses offered for the Northeast region are listed on the following website:

<http://www-seafood.ucdavis.edu/haccp/training/masterca.html>

This website (www-seafood.ucdavis.edu) also links to important seafood-related sites you might want to look at periodically.

Future Alternative Seafood HACCP Training

Ken Gall, NY Sea Grant, has obtained a USDA grant entitled "An Internet-based Distance Education Seafood HACCP Alliance Training Program." This project will convert the existing seafood HACCP training curriculum to a format accessible via the Internet with paid registration. Registered students would be required to complete the traditional "lecture-based" portion of the course on the Internet within two days. On the third day, participants would meet with an instructor to work on the practical HACCP plan exercises. Students would have the opportunity to ask questions and clarify information at this time. Students participating in all three days would receive the AFDO certificate.

This would enable companies to train more of their employees in seafood HACCP by registering them for the Internet-based course, but not the practical session. We'll keep you posted!



HACCP Regulation Questions and Answers

Q: *Because histamine development is slow at low temperatures, are there suitable alternatives to the recommendations in the Hazards Guide for time/temperature critical limits during processing?*

A: Yes. The next edition of the Hazards Guide will be changed to reflect the following new guidance limits of safe exposure to time/temperature.

For previously frozen fish:

24 hours if NOT exposed to temperatures above 70° F

12 hours if exposed to temperatures above 70° F

For fish NOT previously frozen:

8 hours if NOT exposed to temperatures above 70° F

4 hours if exposed to temperatures above 70° F

Critical Limits at Receipt:

Unfrozen fish received 12-24 hours after death, internal temperature 50° F or below

Unfrozen fish received over 24 hours after death, internal temperature 40° F or below

Any histamine testing strategies (either as critical limits, monitoring or corrective actions) continue to be the same as those outlined in the second edition of the Hazards Guide (red cover).



Attention Lobster Handlers, believe it or not, a CCP has been eliminated!

Q: *Is the hazard of PSP reasonably likely to occur in lobster?*

A: No, based on current information, it is NOT reasonably likely that lobster meat or lobster tomalley will contain a toxic quantity of PSP. This is in part because the amount of toxin in lobster meat and tomalley, even from lobsters caught in the same suspect location, is highly variable. This change in the current FDA recommendation will be reflected in the next edition of the Guide.