

# 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

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## A Message from the Editors:

Happy 2017! We hope you all have a great year. It's hard to believe we've been teaching seafood HACCP now for more than 20 years, and co-teaching the courses for 17 years! Here are some of our "numbers": nearly 2,000 individuals trained since 1995, 102 courses offered since 2000, and trainees hailing from 17 states!

We are pleased to send this 20th edition of our newsletter. Past issues of the newsletter are archived on the Connecticut Sea Grant website at: <http://seagrant.uconn.edu/publications/fisheries/index.php>. Scroll down to the Seafood Safety Savvy section.

*Nancy and Lori*

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## CLARIFICATIONS... CLARIFICATIONS on the Food Safety Modernization Act (FSMA) and the New Preventive Controls Rule, as they apply to Seafood Businesses

Since the last newsletter was issued, we determined that we need to clarify or correct some of the information we included related to FSMA and seafood businesses.

First, Subpart F (Records) **DOES** apply to seafood facilities so far as it pertains to the training requirement that is in Subpart A. As a reminder, Subpart A (General Provisions, Part 117.4) states that only qualified individuals manufacture, process, pack or hold food. This means a training requirement is now in place that addresses principles of food safety and hygiene along with knowledge about assigned duties that impact food.

Second, in the last newsletter we were looking for clarification regarding Subpart E (Withdrawal of Qualified Facility Exemption) and whether it could apply to seafood facilities or was only specific to facilities covered under the regulation. Subpart E only applies to facilities covered by the regulation, **HOWEVER**, under extreme circumstances of non-compliance with 21 CFR 123 (seafood HACCP regulation), FDA can withdraw the exemption.

Third, we want to clarify the need to control allergen cross-contact, a requirement in the new GMPs. Seafood processing establishments must develop and adopt allergen controls that

prevent allergen cross-contact. While a written allergen control plan is not required, SSOPs that cover cleaning and sanitizing food contact surfaces, employee hygiene practices, and SOPs for process scheduling can all be used to address this issue. We recommend the development of a specific allergen control plan, particularly for companies producing and / or handling multiple products.

## FSMA Final Rule on Sanitary Transportation of Human and Animal Food

This rule covers only truck (motor) and rail across the United States. Seafood processors are **NOT** exempt overall but there is an exemption for companies that gross less than \$500,000 per year. Dates of compliance begin April 2017. Clarification is still needed with regard to how this rule intersects with the seafood HACCP rule. We will pass this information along when we have it. We encourage everyone to look at this rule, and stay on top of it, as it may affect your business. See: <http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm383763.htm>.

## "COOL" CORRECTION

For those of you who attended our last HACCP class (October 2016), we mentioned that the USDA regulation, Country of Origin Labeling or COOL, had been repealed entirely. This was incorrect. It has only been repealed for beef and port commodities. COOL regulatory requirements are still in effect for the remaining covered commodities: muscle cut and ground chicken, lamb, and goat; wild and farm-raised fish and shellfish; fresh and frozen fruits and vegetables; peanuts, pecans, macadamia nuts, and ginseng. See the following fact sheet for more information: <https://www.ams.usda.gov/sites/default/files/media/FAQs%20-%20COOL.%20Beef%20Pork%20Repeal.pdf>.

## Latest Update to the National Shellfish Sanitation Program Model Ordinance available

The 2015 edition of the Model Ordinance is available on the Interstate Shellfish Sanitation Conference's website. Anyone handling shellstock or shucked product should have this latest edition ([issc.org](http://issc.org)) and check the site periodically for updates.



## NEW Aquaculture Seafood Web Pages

The FDA recently posted new web pages focused on aquaculture seafood that include fact sheets, resources, foreign country assessments and good aquaculture practices. For more information: [http://www.fda.gov/Food/PopularTopics/ucm518782.htm?source=govdelivery&utm\\_medium=email&utm\\_source=govdelivery](http://www.fda.gov/Food/PopularTopics/ucm518782.htm?source=govdelivery&utm_medium=email&utm_source=govdelivery).

## NEW Seafood HACCP Video Series

The FDA recently posted new videos on seafood HACCP-related topics, including time-temperature indicators, time-temperature controls for unrefrigerated processing, secondary processor receiving and storage, heat process validation, and primary processor scombrotoxin controls. The videos can be viewed at: <http://www.fda.gov/Food/PopularTopics/ucm341987.htm>.

## A Reminder...

At the end of any FDA seafood HACCP inspection, your company's senior management will be issued a Form 483 **IF** the investigator has observed any conditions that in his/her judgement may constitute violations of the Food Drug and Cosmetic Act and related Acts. The inspector will discuss the findings on the 483 with senior management. However, this does not reflect the final Agency determination of whether any condition is actually in violation. For more information on FDA

Form 483: <http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm383763.htm>. Senior management is encouraged to respond to the 483 in writing. If questions remain or if there is disagreement with any of the findings, senior management can also write to the FDA district director for clarification. Lori and I are also willing to ask clarifying questions for you.



### Basic Seafood HACCP Training Courses

May 23-25, 2017 Narragansett, RI\*  
September 12-14, 2017 Groton, CT\*\*

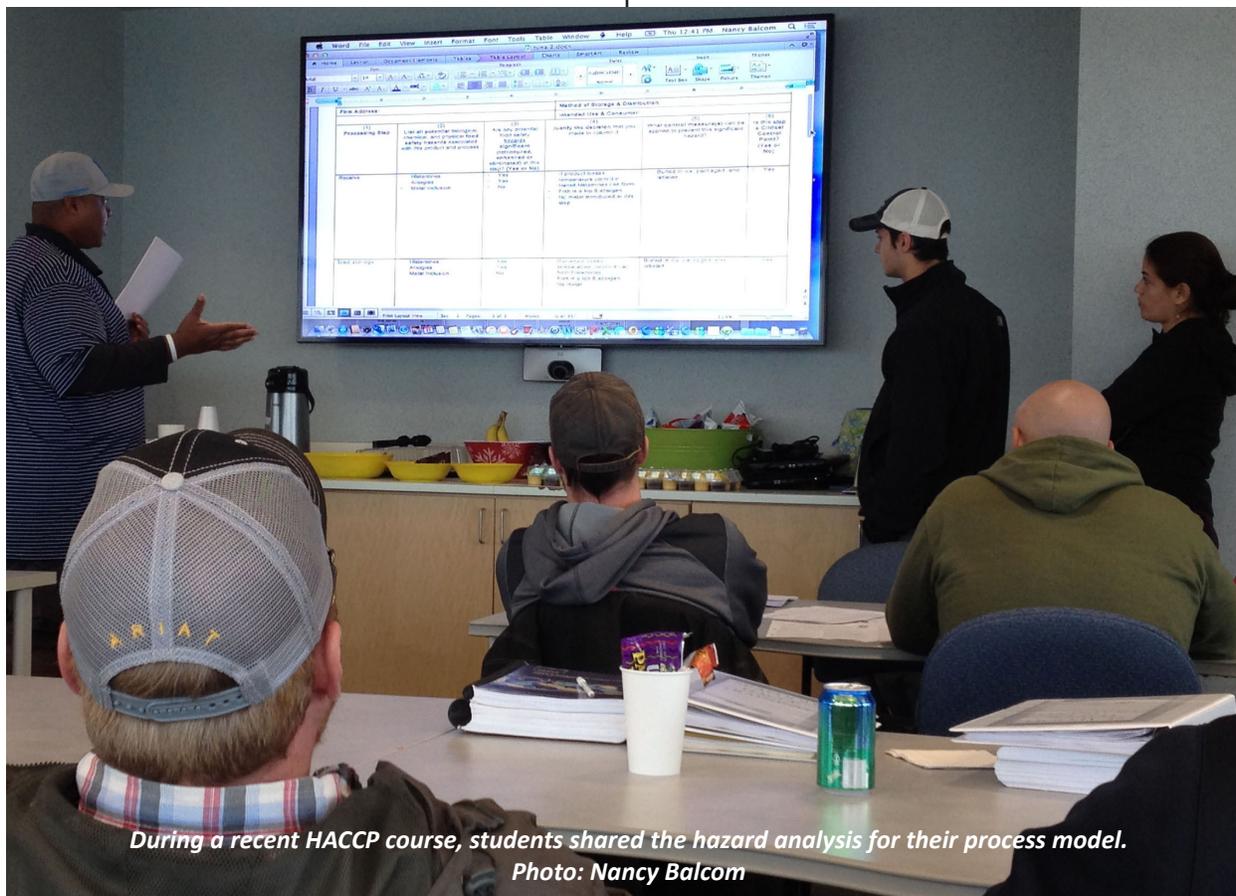
Segment Two Follow-up to Internet Course  
February 9, 2017 Groton, CT\*\* (snow date 2/10)

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New HACCP course dates will be shared with Connecticut and Rhode Island seafood businesses by mail; we also post courses on the AFDO training calendar and the Connecticut Sea Grant website.



*During a recent HACCP course, students shared the hazard analysis for their process model.  
Photo: Nancy Balcom*

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