

SEAFOOD SAFETY SAVVY: A HACCP UPDATE

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

Issue 3 August 2000

A Message from the Editors:

Welcome to our third 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. Since our last issue, we have been trained in the Sanitation Control Procedure Course (SCP). The course and materials have a lot of useful information that will help you address sanitation in your processing facility. In this issue, we are covering what you need to get on the export list to the European Union and describing a booklet that will help you learn what to expect during an FDA inspection. As always, if you need further assistance, please contact us.

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Additional Training Course Offerings

Seafood HACCP Alliance Training Course

October 3-5, 2000 East Setauket, NY
Contact: Ken Gall, (631) 632-8730
Course fee: \$125

Sanitation Control Procedure Course (SCP)

The sanitation control procedures for processing fish and fishery products course was developed by the National Seafood HACCP Alliance for Training and Education. The one-day, AFDO-certificate-granting course is well-designed and focuses on the eight key steps as prescribed by the HACCP regulation (21 CFR 123). The course helps processors address standard sanitation operating procedures, monitoring and corrective action requirements and provides information regarding basic sanitation. (As a reminder, see box on page 2 for the eight key required components for sanitation compliance.)

All eight sanitation issues come directly from Good Manufacturing Practices (21 CFR 110).

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Adequate sanitation control procedures (SCP), along with GMP and HACCP, form a complete seafood safety program. This is not rocket science yet there have been issues of non-compliance concerning the sanitation program, particularly monitoring and record-keeping.

Eight Key Sanitation Requirements

- 3Safety of Water
- 3Condition and Cleanliness of Food Contact Surfaces
- 3Prevention of Cross-Contamination
- 3Maintenance of Hand-Washing, Hand-Sanitizing and Toilet Facilities
- 3Protection from Adulterants
- 3Proper Labelling, Storage and Use of Toxic Compounds
- 3Control of Employee Health Conditions
- 3Exclusion of Pests (Non-Inspector Type)

Your first crack at a Sanitation Control Procedures Course (SCP) is being offered by Lori Pivarnik.

Tuesday, September 19, 2000

Powers Administration Bldg,
RI Dept. of Health
Providence, RI
Course fee: \$65

For registration information, contact Lori at (401) 874-2972 or FAX at (401) 874-2994. *Deadline for registration is Friday, August 25th.*

To check when your favorite HACCP and SSOP courses are being offered around the nation, refer to the following Internet website:

<http://www-seafood.ucdavis.edu/haccp/training/reg-cal.htm>



Future Alternative Seafood HACCP and Sanitation Training

HACCP:

The previous newsletter discussed an Internet-based distance education HACCP training course. This course is currently being designed and should be completed by next spring/summer. We will keep you updated.

SCP:

Delaware State University has received a grant entitled "Enhancing Seafood Safety and Quality". Under the leadership of Bill Daniels (DSU) and Doris Hicks (DE Sea Grant), the grant covers the production of a training video on SSOP development and implementation, based on the new sanitation course. Filming has been completed and the video should be available later this year for national distribution. This video can be used as an on-site training tool for all seafood processing personnel. We will let you know when this video is available.



HACCP Regulation Questions and Answers

Q: *Do you know what to expect during an FDA inspection?*

A: Almost everybody has questions concerning their company's rights during an FDA inspection. If you have not already received a copy of the booklet entitled "*How to Handle an FDA Inspection: What your company needs to know about inspection of seafood processing establishments by the US FDA,*" you may want to contact us for a copy. This is an educational manual designed to help US seafood processors understand their rights and obligations during an inspection as well as the FDA's inspectional authority, obligations and rights.

We would appreciate any feedback on the usefulness of this document. So far, what we have heard has all been positive.

To obtain a single complimentary copy, contact Lori or Nancy.

Do You Want to Export to the EU?

You may have thought that once you implemented your HACCP program you now had a green light to export to the European Union. But no, you also need to get on the FDA's EU Export List and get an EU health certificate. *How do you this?*

The FDA has designed an export health certificate program that meets the requirements for EU health certificates. All processors successfully complying with the HACCP regulation are eligible to participate in the program.

Processing firms wishing to get added to the export list must submit a written request to their regional FDA office. In your case, the request should be addressed to:

Linda Kopkind, EU Coordinator
US Food & Drug Administration
One Montvale Avenue
Stoneham MA 02180

This request must contain the official name and address of the firm site that produces the products intended for export for the EU, and the designated contact person. In addition, a company must provide a list of products and packaging types processed at the site and intended for export. The name(s) of the State and Federal agencies inspecting your facilities must be identified and a statement confirming your operation under HACCP enclosed.

The processing firm must have an acceptable compliance history and must have satisfactorily passed an FDA inspection before it can be placed on the List of Accepted Establishments. The FDA's Northeast Region recognizes the inspection services performed by National Marine Fisheries Service (NMFS) and will accept a NMFS inspection as an alternative to an FDA inspection. If you currently participate in NMFS programs, contact Ms. Kopkind for further information.

Processors are required to submit a copy of the HACCP plan(s) covering the products intended for shipment to the EU.

If your firm is accepted into the program, you will be notified in writing and provided a seven-digit central file number and placed on the FDA's EU Export Health Certificate List. Your firm will remain on this list indefinitely, unless there is a change that disqualifies you.

If acceptance into the program is denied, you will be given the reasons and provided additional instructions in writing. Participation in the program may be denied if the requested information is incomplete.

Once your firm is on the list, all products exported to the EU must be accompanied by an EU Health Certificate. The FDA will provide you with Health Certificates in the proper languages with instructions on completing the forms. The certificates are available in Danish, Dutch, French, German, Greek, Italian, Portuguese, Spanish and Swedish.

The form of your seafood shipment (fresh, live, or frozen) will dictate the specific procedure and timeline you must follow to obtain the official health certificates.

For more detailed information on this program, please contact Ms. Kopkind at (781) 279-1675 ext. 1702.