

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

Issue 7 June 2003

A Message from the Editors:

Welcome to another issue of our newsletter! We hope these periodic updates are helpful in keeping you apprised of seafood safety issues. If you are new to the HACCP-trained world of Lori and Nancy, and would like to look at back issues of this newsletter, they can be found on the internet at <www.seagrant.uconn.edu/seafood.html>. We're sure everyone else has kept them on file, readily accessible! Have a great summer!

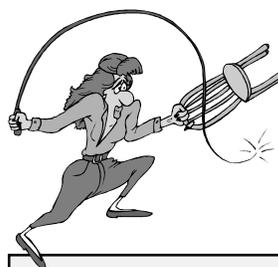
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Update on Biosecurity

As you recall, our last newsletter introduced you to the "Public Health Security and Bioterrorism Preparedness and Response Act of 2002". The food and drug provisions of the Act represents an expansion of FDA's enforcement authorities. The part of the Act that affects the seafood industry is Title III, Subtitle A, Protection of the Food Supply.

As of this writing, the FDA has **proposed** regulations in four key areas that will have an impact on seafood processors. They are:



Additional Training Course Offerings

Segment Two HACCP Course

(for those who have taken the Internet HACCP course)
September 23, 2003 Groton, CT

Seafood HACCP Training Course

October 28-30, 2003 Groton, CT

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

1. Registering food facilities

The FDA will require domestic and foreign facilities that manufacture, process, pack, or hold food for human or animal consumption in the US to register with the FDA. Domestic facilities will be required to register whether or not food from the facility enters interstate commerce. There is no registration fee and each facility will be assigned its own registration number. Exemptions include, for example, retail operations, restaurants, and fishing vessels not engaged in processing as defined in the HACCP regulation.

2. Administrative detention

This proposed regulation authorizes the FDA to detain food where there is credible evidence or

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information indicating a threat of serious health consequences or death to humans or animals. Food, whether or not it enters interstate commerce, would be covered by this regulation. The proposed rule includes expedited procedures for perishable foods, descriptions of how the FDA will detain the food, and the process for appealing a detention order.

3. Establishment and maintenance of records

These proposed regulations would require that records be kept to identify the immediate previous sources and the immediate subsequent recipients of food, including its packaging. This has to do with traceability—to enable the FDA to quickly address credible threats of serious adverse health consequences to humans or animals. Domestic processors and importers, as well as foreign facilities that process, pack or hold food for human or animal consumption in the US, would be expected to keep these records.

4. Prior notice of imported food shipments

This proposed regulation is the most controversial and has been receiving the most comments. It requires that the FDA receive prior notice of food imported or offered for import into the US. This advance notice will allow FDA time to review, evaluate, and assess information before a food product arrives, and shift resources to target inspections and to help intercept contaminated products. Under the proposed rule, any purchaser or importer (or their qualified agent) who resides or maintains a business in the US would be required to submit prior notice of the importation of food.

This is only a very short synopsis of what is included in these proposed regulations. The FDA plans to have these regulations in place ***no later than December 12, 2003***. For more detailed information on these proposed regulations addressing the biosecurity of food, go to www.fda.gov/oc/bioterrorism/bioact.html.

Food Security Preventive Measures Guidance Available

The FDA has finalized guidance effective March 2003 for food producers, processors, transporters, retailers, importers, and filers, called "Food Security Preventive Measures Guidance". These can be found at <http://www.cfsan.fda.gov/~dms/secguid6.html> and <http://www.cfsan.fda.gov/~dms/secguid7.html>.

In addition, there is draft guidance for retail food stores and food service establishments that can be found at <http://www.cfsan.fda.gov/~dms/secguid5.html>.

Histamine Education Program for Commercial Harvesters and Charterboat Operators

As everyone is aware, the seafood HACCP umbrella only covers processors. Concerns have been raised that harvesters dealing with species of fish that can form histamine have not received training on this particular hazard. Yet processors who buy products directly from fishing vessel operators must adequately document that histamine was controlled onboard harvesting vessels before they take ownership.

The National Sea Grant Office has funded a regional education project to address this gap in training. The project will include reviewing current histamine-control programs now used by industry, developing model histamine control procedures, developing a curriculum and training materials for commercial fishermen and charterboat operators, and delivering and evaluating the training via classes, websites, written materials, and surveys.

Hopefully this training will help processors more easily and effectively document the histamine control measures used onboard fishing vessels.

Heads Up on Listeria!

A workshop developed under the FDA CSREES National Food Safety Initiative Project concerning the control of *Listeria* in smoked fish and ready-to-eat processing plants has been presented in key areas across the country. We are hoping to bring this very informative and eye-opening workshop to the New England area this fall. We'll let you know when it's scheduled.

FDA representatives from the Office of Seafood have been present at some of these smoked fish workshops around the country this past year. They are interested in using the latest science presented at the workshops to write much-needed guidance on ready-to-eat products. Dr. Wiedmann and Dr. Grohn from Cornell University have given presentations at CFSAN headquarters in College Park, MD on their *Listeria* research to further this effort. No date has been set for final publication of the guidance from FDA.

The guidance will be concerned with environmental testing of *Listeria* only. We will keep you informed as this progresses.

Attention Exporters!

The American Seafood Institute (ASI) a cooperator organization under the USDA Foreign Agricultural Service, is responsible for developing and expanding foreign markets for the US seafood industry. ASI conducts generic promotion activities such as market research, the coordination of large scale US industry participation at overseas trade shows, trade missions and product seminars/promotions. Qualifying US companies can additionally benefit from ASI's Brand Promotion Program, whereby companies can be reimbursed up to 50% of their costs for overseas trade advertising, product promotions, and trade show exhibiting.

Contact Executive Director Colleen Coyne for more information: (401) 491-9017; E-mail: colleencoyne@cox.net. You can also check out their website: <www.americanseafood.org>.