What’s Required to Process Seafood – a Briefing of Requirements

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Ensuring Public Safety is Our Job

What is HACCP? Hazard Analysis and Critical Control Point

- Internationally recognized food safety and management system PLAN
- Customized for each facility and product
- Hazards that are “reasonably likely to occur” can be from raw materials, handling, procurement, distribution and consumption of the product
- Food Safety Modernization Act has had a major impact
The **Food Safety Modernization Act (FSMA)** law by President Barack Obama Jan 4, 2011.

FDA new authorities to regulate the way foods are grown, harvested and processed.

FDA to better protect public health strengthening the food safety system.

Treats food in a controlled and managed way
Association of Food and Drug Officials (AFDO)

- Seafood HACCP Alliance (SHA) Committee:
  - Federal and State Authorities for Seafood
  - Academic Experts and Publication Office
  - Industry Representatives and Partner Program

- Maintains a uniform and standard training format – globally

- The plan requires author be certified in HACCP
SHA Training and Educational Opportunities

- **HACCP:**
  - Workshops
    - Certificates for course completion
    - Hybrid and in person courses

- **SCP:** Sanitation Control Procedures for Processing Fish and Fishery Products
  - Not required by FDA but **HIGHLY RECOMMENDED**

- **Train-the-Trainer (TTT) Courses**
Be cognizant of laws, rules and more rules – many apply!

- FMSA Food Safety Management Act changes from treatment to prevention
- State Food Code
- FCR – Federal Code of Regulations
  - Seafood HACCP Regulation 21 FCR 123
  - Control of Communicable Disease 21 FCR 1240
- FDA – Federal Department of Agriculture
- Not in HACPP but required:
  - Sanitation controls
  - Corrective action and verification records
  - GMP
  - Transportation
  - Your product may have additional regulations (dairy, low acid, etc.)
First – Make a flow chart of the process

- Example
- Receive product ->
  cooler ->
  head/eviserate ->
  package ->
  label ->
  transport to end user

Each change requires new HACCP – get it right the first time!
Get Ready for the 7 Principles

1. Conduct hazard analysis
2. Determine critical control points (CCP)
3. Establish: critical limits
4. Monitoring procedures
5. Corrective actions
6. Verification procedures
7. Record-keeping and documentation procedures
1. The analysis: What could go wrong

- Identify the hazards
- Determine which are significant
- Plan how to control them
- Example: product is hand filleted
  - Possible that metal enters product from broken or defective fillet knives
  - Control by inspecting knives regularly – very clearly define how to control
Examples of hazards include:

- Foreign material contamination (dust)
- Mislabeling product (allergens)
- Monitoring failure
- Wrong cooking temperature
- Unsanitary conditions (pests)
Use The “Guide” – obtained in certified FDA training or purchase

- Document which guides all possibilities, must follow

- Lists hazards:
  - by species
  - by final product
  - by hazard
  - by process
2. Establish Critical Control Points

- The most important steps **where** the hazard can be controlled, reduced or eliminated to an “acceptable” level.
- Example: the fillet knives can be inspected **before** and **after** the fillet process of a “lot,” say each 50 fish.
3. Establish a critical limit

- Safety limit which separates “acceptable” from “unacceptable”
- Often time and temperature combined
- Example: temp recording device in cooler, if records above accepted temp – REJECT!
4. Establish Monitoring Procedures

- Steps to ensure the hazard or process is under control and monitored.
- Visually checking product or mechanically monitor when .......... 
- Take temp when ...........
- MUST have written records
5. Establish Corrective Action

- Make a list detailing actions to fix it
- Reject?
- Destroy?
- Repair equipment?
- Recook?
- May divert rejected product to non-human consumption but can’t sell it then
- Must document that the corrective action occurred, must be able to show you did what was needed for food to be safe!
6. Establish Verification of your HACCP

- *Prove* that the HACCP is working.
- Daily checks of records – processing logs, equipment calibration, data logs – lots of records out of limit then it is not working.
- Calibrate equipment – it accurate?
- Review customer, carrier complaint records – note patterns.
7. Establish Documentation

- **Record everything**: logs for production, inspections, sanitation, calibrations, pest control, staff training and non-conformance
  - Maintain records for 3 years
- Refrigeration 1 year, frozen 3 years
- Records must be available for inspection, keep organized, FDA mandated by FSMA to increase inspections frequently.
- No documentation? Result: Recall, reject, suspension???

**YES!**

**NO**
For a new, small scale facility:

- Determine your process then determine the equipment needed for this process.
- Let the equipment dictate the design, not the reverse.
- Tour as many facilities as you can, ask ?’s
- Take the HACCP training, fees vary widely
- Establish your market, no market, no product!
The facility – just a few requirements – “must haves”

- Impermeable floor, wall, ceiling, floor w/center floor drain
- 3 bay sink (wash, rinse and sanitize at 170°F)
- Mop sink (not in processing area)
- Hand sink (w/towels, trash, soap)
- Limited access to raw product and processing (ie. Dedicated room w/no other purpose)
- Bathroom in separate room away from processing
- Grounds kept clean: no pests, uncut grass, equipment, etc.
Your staff MUST........

- Perform consistently
- Report problems immediately
- Have training
- Be clean (clothing, hair, body) AND healthy
- Understand bacteria and diseases they cause
- Abide by health codes
- Must have staff that is HACCP certified write the HACCP plan
Must label your product

- Name of product, a list of ingredients, a use–by or best before date, storage conditions, cooking instructions and the name and address of the manufacturer or packer.
- Possibly nutrition, country of origin, and health claims.
- Label should be durable
- Include allergens – can kill someone!
- Labels must contain a truthful and clear description of the product ingredients, an accurate weight of the product, and safe handling instructions.
Determine what your “Lot” will be – limits amount of recall

- Label code blocks of processed products as an aid for tracing back potentially hazardous product.
- Determine a lot number and make a record of it.
- Match lots to any correction actions for easy reference.
And then some more plans..... these all are to be included......

- Good Manufacturing Practices (GMPs),
- Standard Operating Procedures (SOPs),
- Sanitation Standard Operating Procedures (SSOPs)
- Transport Procedures
- Training for staff
Must develop, implement and maintain written Sanitation Standard Operating Procedures (SSOP)

Describe all procedures and daily inspections before and during operations to prevent contamination or adulteration

How, when and who gets things done and recorded
Example of a few SSOP

- Wash/sanitize hands (bathroom)
- Sanitize hands in the processing area.
- No sick workers.
- Facial hair must be covered with beard net (snood)
- Maintain records, record everything.
Waste Disposal must meet regulations

- Offal – solid waste
  - Landfill, compost, burial, incineration, recycle
  - If fed to agricultural animals can’t sell that animal unless offal is tested and approved for human consumption

- Liquid waste – septic or sealed tanks

- All disposal methods must be in accordance with state and local laws
Resources – learn as much as you can!

- HACCP Training Manual – comes with course
- Fish and Fishery Products Hazards and Control “Guide” – with Course
- HACCP Video series, FDA, very good
- AFDO – Association of Food and Drug Seafood HACCP Alliance
- FDA Hazards Guide
- Many private companies
What’s in it for me?

Effects of the HACCP Plan

- Improve your operation from the regulatory standpoint and provide for the safety of your food products
- Reduce the chance for food-borne illness
- Identify and document where corrections need to be made
- Have you thoroughly review your operation specifically for food safety and place controls on those areas of concern
What do you do with your HACCP?

- Must be signed and dated, also each time modified
- Kept by most responsible trained person on site, select one person to work with the inspector
- Submit to local health department (county)
- Sometimes city specific codes
- Can be under federal jurisdiction
- All employees should be familiar with it
- Manager knows it in and out
The End

Thank you!

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