

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

Issue 21 February 2018
CTSG-18-02

A Message from the Editors:

Happy 2018! We are pleased to send this 21st edition of our newsletter, and hope you find it useful. 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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New Rule: NOAA Seafood Import Monitoring Program

Earlier this year, Lori was asked about what was required to import fish from another country under HACCP. In her response, Lori noted that there is a lot to know about importing seafood that includes and goes beyond HACCP. She turned to the National Fisheries Institute (NFI) for clarification. We thought we'd include this information for anyone interested in importing seafood.

1. First you need to follow the importer verification requirements found in the Seafood HACCP regulation (CFR 123.12). These requirements for imported seafood do NOT apply if the country has a Memorandum of Understanding (MOU) with the US Food and Drug Administration (FDA). There are currently three countries with MOUs with the United States - Canada, New Zealand and Australia.
2. All foreign facilities must register with the FDA.
3. As an importer, you must comply with the FDA prior notice requirements found in the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (<http://www.fda.gov/regulatoryinformation/lawsenforcedbyfda/ucm148797.htm>). Pay particular attention to Section 307 - PRIOR NOTICE OF IMPORTED FOOD SHIPMENTS.
4. Finally, there is a new requirement from NOAA - the NOAA Seafood Import Monitoring Program, with a compliance date of January 1, 2018. (Link to Rule: <https://www.federalregister.gov/documents/2016/12/09/2016-29324/magnuson-stevens-fishery-conservation-and-management-act-seafood-import-monitoring-program>). This is the first phase of a risk-based

traceability program that requires the importer of record to provide and report key data from the point of harvest to the point of entry into U.S. commerce for imported fish and fishery products identified as particularly vulnerable to illegal, unreported and unregulated (IUU) fishing and/or seafood fraud. The species are Atlantic Cod, Blue Crab (Atlantic), Dolphinfin (Mahi Mahi), Grouper, King Crab (red), Pacific Cod, Red Snapper, Sea Cucumber, Sharks, Swordfish and Tunas (Albacore, Bigeye, Skipjack, Yellowfin and Bluefin). Abalone and Shrimp have delayed implementation. More information on the NOAA program can be found at: <http://www.iuufishing.noaa.gov/RecommendationsandActions/RECOMMENDATION1415/FinalRuleTraceability.aspx>

FSMA UPDATE: Final Rule on Sanitary Transportation of Human and Animal Food clarified

The FDA has issued guidance to clarify that waivers to the Sanitary Transportation rule cover retail food establishments that sell food for humans. In April 2017, the FDA announced three waivers for businesses whose transportation operations are subject to existing regulatory controls. One of the waivers applies to businesses transporting molluscan shellfish that are certified and inspected under the requirements established by the Interstate Shellfish Sanitation Conference (ISSC) National Shellfish Sanitation Program (NSSP) and that transport the shellfish in vehicles permitted under ISSC authority. (<https://www.fda.gov/food/newsevents/constituentupdates/ucm548729.htm>)

FSMA Preventive Controls for Human Food - Clarifications for the Seafood Industry

In our last two newsletters (January 2016, Issue 19; January 2017, Issue 20), we covered the specific parts of the Food Safety Modernization Act (FSMA) Preventive Controls for Human Food Rule (21 CFR 117) that apply to the seafood industry. To further reduce confusion about what applies and what doesn't, the FDA published the Seafood HACCP and the FDA Food Safety Modernization Act: Guidance for Industry in August 2017. For more information, please refer to: <https://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/ucm569796.htm>

continued on page 2

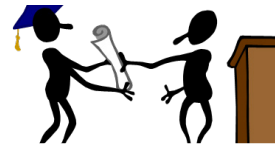
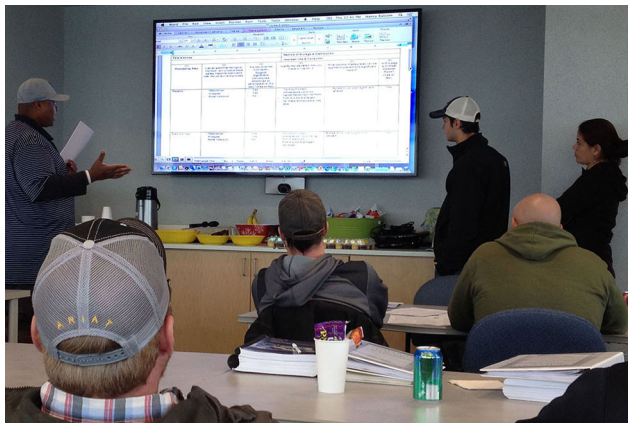
FDA Websites with Topics of Potential Interest

The FDA has websites with links to resources and topics that may be of interest to members of the seafood industry. They include guidance documents, popular topics, videos, and consumer information. The following sites provide an array of links to useful resources. Start clicking!

<https://www.fda.gov/Food/PopularTopics/ucm341987.htm>

(At the above site, there is a place where you can subscribe to Seafood Safety Alerts.)

<https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Seafood/ucm2018426.htm>



Upcoming Basic Seafood HACCP Training Courses

May 15-17, 2018 Narragansett, RI*

September 11-13, 2018 Groton, CT**

Segment Two Follow-up to Internet Course

September 27, 2018 Groton, CT**

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Notices of upcoming HACCP courses will be shared with Connecticut and Rhode Island seafood businesses by mail; our courses are posted on the AFDO training calendar once they are registered (<http://www.afdo.org/page-1186192>) and can also be found on the Connecticut Sea Grant website (<https://seagrant.uconn.edu/focus-areas/sustainable-fisheries/seafood-safety/>). Typically we offer two basic three-day training courses per year (spring in RI; fall in CT) and two Segment Two one-day courses per year. The Segment Two class is the mandatory follow-up to the online Segment One course offered by Cornell University. Both the basic course and the online course combined with the Segment Two course meet the FDA's training requirement.