

Seafood HACCP

For seafood processors, seven-point HACCP (Hazard Analysis Critical Control Points) plans—monitored by the FDA—are mandatory. The FDA inspects processor plants annually. Processors must record the steps of their HACCP plans on a regular basis. If violations are found, FDA notifies the processor which must implement corrective action. The FDA typically does not post such violations, but foodservice operators can contact their state and local health departments, many of which provide such information on their own Web sites, according to Shirley Bohm, consumer safety officer at the FDA's Center for Food Safety and Applied Nutrition (CFSAN). In addition, she notes, it is important for operators to provide purchasing specs that hold suppliers to desired levels of performance.

Among main critical points for fresh seafood of all types, is temperature control, says Bohm. The minimum control point for protecting fish and shellfish at operator level is 41 to 45 degrees E, she explains. The lower the temperature, the longer the shelf life: At 41 degrees E, fresh seafood has a seven-day shelf life; at 45 degrees E, four days. For processors, on the other hand,

shelf life is determined by such factors as where the product is harvested and how the processor handles it.

In FY 2003, approximately 91% of domestic and international seafood processors and importers were in compliance with U.S. HACCP requirements, according to CFSAN.

At the same time, regulators are required to assist operators in developing and implementing voluntary strategies to strengthen existing systems and to prevent the occurrence of food-borne illness risk factors, according to the FDA Food Code. Elements of an effective seafood—and all food—safety management system for operators, according to the Code, may include the following:

- ◆ Certified food protection managers who have passed a test that is part of an accredited program
- ◆ Standard operating procedures (SOPs) for performing critical operational steps in a food preparation process, such as cooling
- ◆ Recipe cards that contain specific steps for preparing a food item and the food safety critical limits, such as final cooking temperatures, that need to be monitored and verified

- ◆ Purchase specifications
- ◆ Employee health policy for restricting or excluding ill employees
- ◆ Manager and employee training
- ◆ Specific goal-oriented plans, such as Risk Control Plans (RCPs), which outline procedures for controlling food-borne illness risk factors.

A HACCP plan contains many of these elements and provides a comprehensive framework by which an operator can effectively con-

trol the occurrence of food-borne illness risk factors, according to FDA.

The principles of HACCP are an integral part of the draft *FDA's Recommended Voluntary National Retail [including Foodservice Operators] Food Regulatory Program Standards*. A complete set of Program Standards is available through FDA's Center for Food Safety and Applied Nutrition (CFSAN) Web site at www.cfsan.fda.gov/~dms/ret-toc.html. NSF HACCP course information can be found at: www.nsf.org/cphe/.

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