



Behind-the-scene activities at Braun Seafood Company in Cutchogue, NY. A fisherman weighs and ices his catch while workers inspect and store tagged shellfish and carefully handle each seafood product—all to assure quality, safety and freshness for seafood consumers.

## Making Your Seafood Safer

In April 2011, the U.S. Food and Drug Administration (FDA) released the first update in 10 years of its Fish and Fishery Products Hazards and Controls guidance (FDA Hazards Guide) for seafood processors. These changes – which describe appropriate science-based “HACCP” (pronounced hassip), or Hazard Analysis Critical Control Point, controls for various types of seafood products – impact our nation’s \$60 billion seafood industry, which employs some 250,000 workers.

Like Braun Seafood Company pictured above, all businesses that handle seafood after it is unloaded from the fishing vessel or harvested from a fish farm until it reaches the retail store or restaurant must apply HACCP principles and develop a plan to prevent or control any food safety hazards associated with their products and operation. “This system is designed to help food processors produce safer food products for consumers,” says New York Sea Grant’s Seafood Specialist **Ken Gall**.

Through proper training, seafood processors learn how to use the FDA guidance to identify which food safety hazards (eg., harmful microorganisms, toxic chemicals, additives, allergens, and/or physical contaminants) are likely to be associated with their products or processing operation. Based on this analysis, a system of controls is developed at Critical Control Points (CCPs), or those steps in the seafood processing operation – from receipt of raw materials to processing steps and storage – where food safety hazards must be prevented, eliminated, or reduced to an acceptable level.

While HACCP is not a “magic bullet” that will make all food safety problems disappear, Gall says, “The process is designed to help seafood businesses anticipate and prevent food safety problems before they occur, rather than trying to fix or correct these problems after they’ve already happened.”

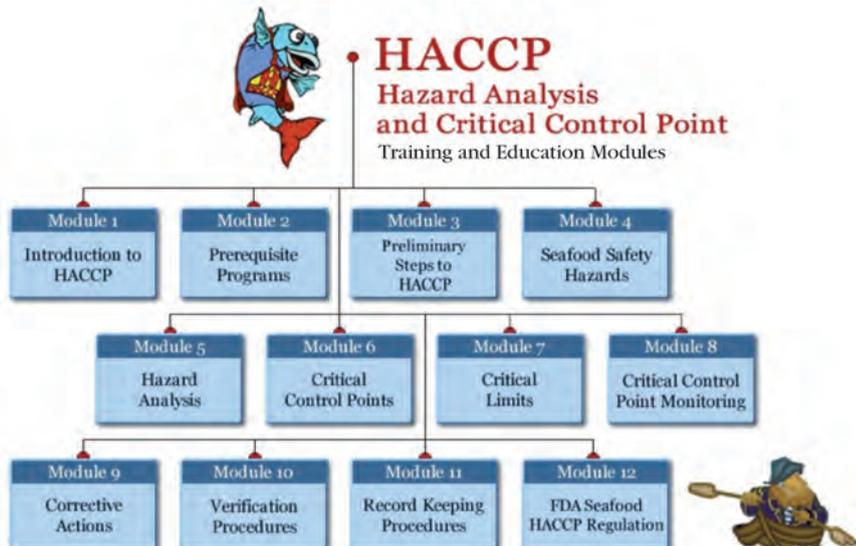
Working with the National Seafood HACCP Alliance, FDA, NOAA’s National Marine Fisheries Service, the U.S. Association of Food and Drug Officials (AFDO), the National Sea Grant network and numerous other partners, a standardized training program for the seafood industry and federal and state inspectors was developed in the mid-1990s. The original training program was a three-day workshop conducted by a team of instructors. Several thousand individuals completed one of these courses taught in NY by NYSG’s Ken Gall and trainers from the seafood industry, FDA and the NYS Department of Agriculture & Markets.

In 2000, Gall developed an alternative training format in which the first two days of standard training are replaced with an Internet course, a desirable alternative for businesses across the U.S. Gall reports over 5,800 people from all 50 states and 46 foreign countries have registered for the Alliance’s Internet course. In total, over 28,000 people have been trained through classroom and Internet courses since the program’s inception.

After completing the Internet course (Segment One), individuals must attend a one-day “live” Segment Two course to complete their training and receive a certificate from the AFDO to demonstrate that they meet the training

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requirement of the FDA regulation. NYSG's Gall has taught at least four of these one-day courses each year for the past decade.

Attendees at the Spring 2011 courses held in NYC's FDA offices included **Philip Karlin**, founder of PE & DD Seafood in Riverhead, NY and a 43-year commercial fisherman. This small, family-owned commercial fishing operation offers wild-caught fish and seafood and is one of a handful of local companies that sell their catch at NYC's Greenmarkets. **Johnny Ortiz** from the Bronx's Nebraskaland received training, too. Since its 1989 start, Nebraskaland has rapidly grown into the largest meat and fish distributor in the NY metropolitan market, bringing it recognition in of *Crain's Business Weekly* as one of the top 200 privately-held companies.

Attendee **Nellie Wu**, General Manager at W&T Seafood, a family-owned and operated Brooklyn company, carries an array of fresh and frozen fish, shrimp, and shellfish. "We only build partnerships with the producers, farmers, and suppliers who are committed to our quality standards," says Wu. "In addition to focusing on our selection of product, our primary concern is the health and safety of our customers. We adhere to the FDA's strict HACCP guidelines to ensure the safety of our facilities and products."

The new edition of FDA's Hazards Guide—a 450-page document—contains significant changes in control strategies for various seafood safety hazards that needed to be shared with the Alliance's network of trainers as well as with the seafood industry and government inspectors. In Summer 2011 the Alliance developed a half-day workshop designed to explain the changes in the new FDA Hazards Guide and help businesses incorporate the latest control strategies into their HACCP food safety control plans and show inspectors how to evaluate these new plans. Gall, who helped develop the workshop, taught the course in San Francisco, CA and Providence, RI.

With the release of the new edition of FDA's Hazards Guide, the National Seafood HACCP Alliance updated

all of its training materials with Gall playing a lead role in their production. These new training materials will be used across the U.S. and in countries that export seafood to the U.S. for the next decade.

The Alliance is also conducting a series of trainer requalification programs for the several hundred trainers across the U.S. to introduce them to the new course training curriculum and teaching modules. Gall says, "The Alliance's intent is to establish a uniform and standard training format for the seafood processing and importing industry and U.S. regulatory officials based on qualified trainers, current training materials, and approved courses."

The NYS Department of Agriculture & Markets inspects seafood processors and recently adopted the FDA's guidelines as state regulation. "State inspectors are required to complete seafood HACCP training before inspecting seafood processing firms, and so we use the course that Ken Gall teaches to fulfill this requirement," says Erin Sawyer, Director of Field Operations for the department.

With many foreign seafood firms exporting their products to the U.S., Alliance training on HACCP-based FDA regulation compliance is crucial in other countries as well. In August 2011, Gall travelled to China with Dr. Steve Otwell of Florida Sea Grant and an AFDO representative to conduct a basic HACCP course and a train-the-trainer course that will qualify instructors to deliver Alliance training in China.

"Seafood is a complex commodity, the HACCP concept can be difficult for some to grasp, and the FDA guidance can be overwhelming for those who don't know how to use it," says Gall. "The Alliance training program provides seafood businesses with the knowledge they need to understand HACCP and the FDA's regulatory requirements, and the skills needed to identify which food safety hazards are associated with their products and how they can be effectively controlled."

— Paul C. Focazio