OREGON DEPARTMENT OF AGRICULTURE

Food Safety: 635 Capitol St. NE, St 100, Salem, OR 97301

*** Is a Seafood HACCP Plan required? ***

1. Does the product contain seafood (fish, crustacean, shellfish)?
2. Will the product be available for wholesale customers?
3. Will the product contain seafood with meat and/or poultry?

If the answer is **"YES" to any of the questions above,** the manufacturing firm must submit a seafood HACCP plan to the Division, which is specific to the facility and product. The Division will review the HACCP plan prior to granting approval for manufacturing and/or licensing.

Additionally: If the answer is **"YES" to question (2) and (3); and the amount of meat or poultry in your seafood product exceed 2% (for cooked meat)) or 3% (for raw meat),** then you will need to contact USDA for any requirements by the FSIS (Food Safety and Inspection Service).

What ODA's Food Safety Division does:
☑ Review and comment on your HACCP plans
☑ Confirm / clarify / approve / license process & operations

What ODA's Food Safety Division doesn't do:
☒ HACCP Plan Development
☒ Approve HACCP plan(s)

*** Is Seafood HACCP Training Required? ***

1. Does the firm currently have personnel who have completed an accredited seafood HACCP course or possess acceptable experience in seafood HACCP?
2. Is the seafood HACCP person identified by the facility qualified and trained to conduct the hazard analysis, develop required HACCP plans, and perform the ongoing modification and verification activities required by the plan?

If the answer is **"NO" to either of the two questions above,** then you will need at least the basic seafood HACCP training.

Seafood HACCP Training Requirements

The FDA mandatory seafood HACCP regulation, Part 123.10 requires that certain HACCP activities must be completed by a "HACCP trained individual." **A HACCP trained individual is one who has completed training in the application of HACCP to fishery products or who has acquired the knowledge through job experience. The primary measure for training will be performance**. An accredited course provides a "standardized curriculum" recognized by the FDA.

"21 CFR Sec. 123.10: Training. At a minimum, the following functions shall be performed by an individual who has successfully completed training in the application of HACCP principles to fish and fishery product processing at least equivalent to that received under standardized curriculum recognized as adequate by the U.S. Food and Drug Administration or who is otherwise qualified through job experience to perform these functions. Job experience will qualify an individual to perform these functions if it has provided knowledge at least equivalent to that provided through the standardized curriculum.

(a) Developing a HACCP plan, which could include adapting a model or generic- type HACCP plan, that is appropriate for a specific processor, in order to meet the requirements of Sec. 123.6(B);

(b) Reassessing and modifying the HACCP plan in accordance with the corrective action procedures specified in Sec. 123.7(c)(5), the HACCP plan in accordance with the verification activities specified in Sec. 123.8(a)(1), and the hazard analysis in accordance with the verification activities specified in Sec. 123.8(c); and

(c) Performing the record review required by Sec. 123.8(a)(3); The trained individual need not be an employee of the processor."

*** <u>HACCP Resources</u> ***

<u>Seafood HACCP Alliance</u>

Co-Sponsors:
- Association of Food & Drug Officials (AFDO)
- International Food Protection & Training Institute
- U.S. Food & Drug Administration/Division Seafood Safety
- USDA/ National Institute of Food and Agriculture
- Sea Grant College Programs and Cooperative Extension Services in universities across the nation

<u>Publications</u>

FDA's Seafood Hazard Guides, 4th Edition (available for purchase at www.ifasbooks.com)

<u>Website</u>

- www.fda.gov
  - http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=123
- www.afdo.org
- http://seafood.ucdavis.edu
- http://seafoodhaccp.cornell.edu/Intro/index.html

The Hazards Guide is available via the Internet at: http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/Seafood/FishandFisheriesProductsHazardsandControlsGuide/default.htm

If you did not buy the new Guide, you can check out the PDF file on line at: http://www.fda.gov/downloads/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/Seafood/UCM251970.pdf