



SOUTHEASTERN FISHERIES ASSOCIATION MEMBERS PROVIDE SAFE, SUSTAINABLE, TRACEABLE SEAFOOD TO THE NATION

During the past few decades Environmental Non-Government Organizations (ENGO's) have published and distributed fish-warning brochures telling consumers what seafood to eat. ENGO's often say "*seafood is dangerous - seafood is overfished - seafood is not sustainable and seafood has no traceability programs.*" This is not an accurate or honest statement. This group of ENGO's usually provide color-coded seafood lists for consumers to follow i.e. green (good to eat)-yellow (eat with caution)- red (bad to eat). The color-code scheme has been adopted by some state health departments. The brochures can confuse consumers who should eat more fish, not less fish, for a variety of health reasons.

A different group of ENGO's created certification fundraising programs coercing major fish processors and grocery retailers to buy their specific "seal of approval". The Marine Stewardship Council (MSC), organized as a charity by the World Wildlife Fund, had income of 24 million dollars in 2011. MSC is less political than Greenpeace or Audubon who entered the "certification safety seal business" after watching MFC rake in millions of dollars from seafood businesses and retail grocery chains pressured to buy the MSC certification.

ENGO's use dire predictions of "doom and the end of large fish" to confuse the public. They claim fisheries are unsustainable unless their organization provides the seafood business or retail grocery chain their high-priced seal. ENGO's say there is no traceability within the seafood industry or properly implemented safety programs to protect the consumer's health and well-being. They are absolutely wrong, as it pertains to domestic seafood products and imported products that comply with US regulations and receive the same level of inspection as domestic products. Many ENGO's are experts at adding confusion and doubt about seafood among consumers. Their constant litany claiming fish resources are "going to hell in a hand basket" deters consumers from eating seafood, which is one of the healthiest proteins on the planet.

Sustainability, traceability and safety issues are complex but understandable.

Southeastern Fisheries Association (SFA) is a 501 c 6 fisheries association founded in 1952 and headquartered in Tallahassee, Florida. It offers the following scenario of what actually occurs every day in the real operation of a seafood processing business. The US Food and Drug Administration's (FDA) seafood safety regulations are found in Chapter 21 Code of Federal Regulations Part 123 (21CFR123). These regulations have been mandatory since 1997 and are considered the Bible for seafood safety. The regulations require Hazard Analysis and Critical Control Plans (HACCP) for all species of fish handled by seafood businesses that buy and sell seafood in the United States. Unfortunately, not all firms that sell seafood comply with state or FDA regulations. These non-compliant seafood sellers are the reason for stringent state and federal inspections.



SFA MEMBERS OPERATE UNDER CERTIFIABLE AND EVER IMPROVING HACCP PLANS.

A seafood facility's HACCP plan and mandatory daily records are routinely inspected by state inspectors and FDA investigators. Any seafood firm not in compliance with 21CFR123 is subject to having their seafood products declared unfit for human consumption if the required contemporaneous records are not available for the inspector/investigator or if critical control monitoring is not recorded on the appropriate HACCP records during each day's operation.

How do SFA fishermen, packers, processors and distributors comply with federal requirements including the Seven Principles required by HACCP Protocol?

Task 1 - Establish a HACCP team— it should include owner and plant managers

Task 2 - Describe the seafood product(s)—each facility handles different seafood items so each HACCP Plan is different, but the primary hazards (biological-chemical-physical) remain the same.

Task 3 - Identify the seafood product's intended use—will it be cooked by consumer or at facility? At what temperature must it be held?

Task 4 - Draw a seafood processing flow diagram for each facility's processing step- Identify handling of the seafood product from receiving the product to storage and transportation.

Task 5 - On site confirmation of flow diagram- physically follow the activity while plant is operating to confirm diagram reflects exactly what is happening in the plant.

Task 6 - Identify and analyze hazard(s) - (**Principle 1**)-

Task 7 - Determine the Critical Control Points (CCP's) - (**Principle 2**).

Task 8 - Establish critical limits for each CCP - (**Principle 3**)

Task 9 - Establish a monitoring procedure and keep daily records - (**Principle 4**)

Task 10 - Establish corrective action before a problem occurs - (**Principle 5**)

Task 11 - Verify the HACCP plan is working weekly - (**Principle 6**)

Task 12 – Keep and maintain daily HACCP records - (**Principle 7**)

Below is an example of how a HACCP Plan works when handling histamine-type fish, harvested in federal waters off Jacksonville and landed in Mayport, Florida at the imaginary ABC Fish Company.

Besides the myriad local and state licenses required for operating a seafood facility, the ABC Fish Company must possess a current federal dealer's permit to unload Spanish mackerel harvested in federal waters and must file landing reports with the National Oceanic and Atmospheric Administration (NOAA) in order to legally buy fish from licensed fishermen.

The way a HACCP Plan works.

A commercial fisherman holding all requisite permits ties his boat up to ABC Fish Company's dock to unload 1500 pounds of Spanish mackerel caught the previous night.



The fisherman must be licensed by the State of Florida and federal government to harvest Spanish mackerel under the Spanish mackerel federal fishery management plan. The federally approved Fishery Management Plan (FMP) sets a total allowable harvest of Spanish mackerel that prevents overfishing.

The fisherman must file a mandatory Fishing Trip Ticket with the Florida Fish & Wildlife Commission. The Trip Ticket identifies the species of fish harvested, where the fish was harvested, what kind of gear was used and other data collection requirements. The trip tickets provide empirical data to protect and manage Spanish mackerel.

The fisherman, certifies in writing, to the ABC Fish Company that the Spanish mackerel he harvested was properly iced as soon as they were in the boat's fish box.

When the fish are unloaded the ABC Fish Company becomes the Primary Receiver of the Spanish mackerel which requires stringent, daily record-keeping.

- Actions that have happened concerning the 1500 pounds of Spanish mackerel.
 - **The fish were harvested from a sustainable fishery.(NOAA)**
 - **Traceability began when the harvest records were filed with the ABC Fish Company and the State of Florida's Fish & Wildlife Commission.(Trip tickets).**
 - **The fish were harvested, unloaded and processed under the requirements of a written HACCP Program assuring seafood safety at each step.(FDA)**

After ABC Fish Company becomes the Primary Receiver the HACCP Plan begins.

The ABC Fish Company unloads the fish on their receiving dock and moves them into the processing facility to begin a series of processing steps listed in the HACCP Plan.

A HACCP certified employee immediately does the following:

- Verifies that the Spanish mackerel are fully iced and recorded on the Receiving Log.
- Probes the internal temperature of at least 18 Spanish mackerel in the lot and records the average temperature on the Receiving Log.
- Performs a sensory evaluation (smell-feel-observe) by examining the eyes to see if they are clear, cloudy or sunken; touches several different areas of the fish flesh to see if it is firm, semi-firm or soft then record the results on the Receiving Log.
- Visually inspect the gills to determine if they are red or pink or no color and record the result on the Receiving Log.
- Move the Spanish mackerel into the cooler that is kept at 40 degrees F or less.
- Cover the fish with ice while they are stored in the cooler.



If the fish are to be filleted they are removed from the cooler and held on ice until the cutting step begins. After the fish are filleted and packed, they are returned to the cooler or freezer.

The HACCP certified employee does the following:

- Determines the amount of time the Spanish mackerel were off the ice and record the time in the Processing Log.
- If the fish are off the ice for less than two hours no further records need recording at this processing step.
- After the fish are packed and in the cooler or freezer, the product is ready for shipment and must be transported on ice or surrounded by ice packs to maintain an internal temperature of 40 degrees F or less.

In addition to maintaining mandatory log books to control all hazards in the facility (Biological-Chemical-Physical), SFA members also are required to:

- Comply with all Good Manufacturing Practices-(GMP)
<http://www.fda.gov/food/guidancecomplianceregulatoryinformation/currentgoodmanufacturingpracticescgmps/default.htm>
- Observe and record Eight Daily Sanitation Requirements concerning everything from the cleanliness of the equipment, personal health and cleanliness, hand washing facilities, clean toilets, proper storage of cleaning compounds, monthly pest control from a professional company and maintenance of the land and buildings.
- Follow their Product Recall Plan, tested quarterly, in the event FDA issues a “stop sale” of a seafood product.
- A functional Product Recall plan is normally required for seafood vendors supplying major restaurants and grocery chains.
- Adhere to the ABC Fish Company’s written security plan controlling access to processing areas and screening of employees and new hires.
- Participate in or provide annual training for employees pertaining to sanitation and HACCP Plan recordkeeping.

This brief description of how the ABC Fish Company operates demonstrates how SFA members harvest, unload and process seafood products under stringent state and federal regulations. SFA members comply with all state and federal food safety requirements. SFA members offer safe, high-quality seafood products to consumers throughout the nation. Not only is their seafood safe to eat it is harvested from sustainable fisheries and easily traced.



CONCLUSIONS

1. SFA members harvest under federal fishery management plans that guarantee sustainability of the fishery. The federal regulations applied to all domestic seafood harvesters are stringent. If the total allowable harvest (TAC) was increased significantly in all southeastern fisheries they would still be sustainable.
2. SFA members strongly affirm NOAA has the preeminent scientific expertise to determine if a particular fish stock is sustainable. This recognized expertise is proven over and over because the “ENGO’s selling Sustainable Fisheries Seals” use NOAA science for their seal certification process.
3. SFA members attest domestic seafood is traceable back to the harvest through mandatory state and federal regulations in place.
4. SFA members must record from whom they bought seafood and to whom it was sold. This traceability requirement is federal law. (2001 Anti-terrorism statute)
5. **SFA members strongly believe seafood traceability programs WITHOUT government oversight and government audits are nothing but public relations schemes. If no government agency checks the traceability program, then anything goes.**

SFA invites questions or comments from anyone interested in seafood safety, sustainability and traceability of our domestic seafood resources.

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