

# 2012/2013 AFDO FINAL COMMITTEE REPORT

## Seafood Committee

**Co-Chair:** Julie Henderson, VA Dept of Health

**Co-Chair:** Rita Johnson, FL Dept. of Agriculture & Consumer Services

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**Charge [1]:** The Co-Chairs will serve as the lead liaisons for AFDO on the Seafood HACCP Alliance and keep the Board apprised of all activities.

**Discussion:** There has been minimal activity this year with the Seafood HACCP Alliance. There is a current lack of funding for the Alliance at this time as well. The Chair of the Alliance, Dr. Steve Otwell, was contacted regarding our concern for approving any trainer regardless of their background if they had passed the TTT course and regarding future activities of the Alliance and his reply is listed below.

The next Seafood HACCP Alliance (SHA) Steering Committee meeting will most likely be in early Fall 2013 near Baltimore to better accommodate FDA participation. I am also exploring a possible SHA Steering Committee meeting before the AFDO meeting in Louisville on June 6-7. The pre-AFDO meeting would allow more State participation if committee members can come early. There is no urgency for the meeting and most things seem to be going well with the Seafood HACCP Alliance.

The concern for qualified trainers has been a continuing issue that was improved with the latest re-qualification process through 2012, but some instructor's ability is still questioned. The criteria for approved trainers remains anchored in the fact that the trainer qualifications begin with applications reviewed for participation in the TTT courses. If they complete the TTT course, then they only need to follow the protocol for teaching courses as reflected in the requests for course approval. The approvals only screen course criteria as listed in the course applications, more so than trainer qualifications relative to their experience. The last measure is course evaluations, and we rarely see any issues with the course evaluations. No doubt some trainers are good or poor relative to knowledge, experience or ability to instruct. Likewise, their seafood and HACCP knowledge does not automatically make them a good trainer or teacher. Also recall some graduates of the seafood HACCP training simply complete the internet course with no trainer instruction other than a possible segment two.

These concerns have been discussed annually at each Steering Committee meeting with the same conclusions.....the Alliance is doing the best that they can, mindful of a very limited budget and the multitude of issues involving difference in mode of delivery and diverse audiences and situations across the nation. I suspect we could explore more involved measures, but the program remains very cost-effective realizing the real measure for HACCP compliance is far more than training. The actual regulatory definition and measure for HACCP knowledge is not completion of a course but performance.

I welcome suggestions and sincerely thank all for their concerns and special efforts. We all have day jobs!

We responded to Dr. Otwell that we support his effort to arrange a meeting immediately before the AFDO conference in Louisville in June and understand the parameters regarding qualified trainers.

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**Recommendation:** Both co-chairs will keep in contact with the Seafood HACCP Alliance and assist and participate as often as possible to keep this Alliance strong. We appreciate the support of the AFDO Board to promote funding for the Alliance. A resolution was sent last year; do not know the response.

**Executive Committee Action:** AFDO continues to pursue funding for the Alliance. Funds are currently in OPS but need to be approved by the ACRA. Dr. Otwell should contact OPS.

Approval  Disapproval  Date 5/22/13

**Charge [2]: Approve AFDO/Seafood HACCP Alliance courses per established protocol. Ensure mandatory topics are covered with adequate timeframes and with certified instructors.**

**Discussion:** The Seafood Chairs and the reviewers from the 6 affiliates have been approving the various course applications, per the AFDO/Alliance HACCP and SCP Training protocol, received thorough the AFDO office, for both domestic and international applications. We have noticed an increase in submissions for approval since the revised Guide was published and trainers re-qualified.

Below are the statistics provided by the AFDO office on type and number of courses approved during the time frame of this report. Also, attached to this document is a statistical report for the Seafood Alliance Course Approvals since its inception provided by the AFDO office.

Year 2013: Basic = 25; Segment II = 33; SCP = 2; Total = 60

Year 2012: Basic = 51; Segment II = 67; SCP = 8; Trainer Basic = 4; Total = 130

The Co-chairs would like to see an internal AFDO document that provides further clarification in regards to 5.2.2 and 6.0 of the AFDO/Alliance Protocol. The current requirements do not provide clear direction for the AFDO office as to the course application review process. The Seafood Committee will submit to the AFDO office a document once drafted for their review.

**Recommendation:** Co-chairs of the Seafood Committee and the reviewers from the affiliates continue to approve applications for Seafood HACCP courses per our protocol. The chairs are to submit written internal protocol for all reviewers and formalize the approval process for consistency.

**Executive Committee Action:** Joe Corby will contact Rita Johnson for clarification.

Approval  Disapproval  Date 5/22/13

**Charge [3]: Review the committees proposed updates on the Cured, Salted & Smoked Fish Est. GMPs including Listeria Manual (May 2004) and compare to the new revised hazards guide to ensure no additional or conflicting information exists between both documents. (Due for revision in 2010)**

**Discussion:** The Seafood Committee has been working on this charge for some time. Since the charge, several revisions have been created. A technical review committee reviewed the first revision and there were major changes of scope and technical issues. All comments were incorporated into a 2<sup>nd</sup> revision. We held up on the revision while awaiting the revision to the Fish/Fishery Hazard Guide so we could add up-to-date information to the AFDO document. Appropriate additions were added to

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the document due to that publication. Due to current increase or appearance of an increase in *Listeria monocytogenes* in cold smoked salmon, the addition of the LM Control manual appeared to be outdated. We inquired and were told there is not a revision to that document dated December 2002 and to our knowledge there is no group working on a revision/update. We did find FDA guidance and will add that as well to the document. We are in the process of formatting the document for easier review before sending out to the technical committee again for their final approval.

**Recommendation:** We carry over this charge for next year and complete the revision in time for legal review and board approval. The Seafood Chairs would like to acknowledge Eugene Evans as the Project Lead for this revision and all his hard work and time put into this effort.

### **Executive Committee Action:**

Approval  Disapproval  Date 5/22/13

### **Charge [4]: Develop food safety guidance for wholesale sushi manufacturers.**

**Discussion:** A draft of this guidance document has been created with Eugene Evans as the project lead with assistance from the technical review team. Comments from the initial review were incorporated into the document and a conference call was held to further clarify needed changes to the draft document. We have added some advanced sanitation language and will mention some benefits of environmental sampling. Current issue to be discussed is acidified sodium chloride and other chemicals; how we can decide how that portion can be written. Another conference call will be held to address that item.

**Recommendation:** We carry over this charge for next year if not completed in time for legal review and board approval; we are close. The Seafood Chairs would like to acknowledge Eugene Evans as the Project Lead for this document and all his hard work and time put into this effort.

### **Executive Committee Action:**

Approval  Disapproval  Date 5/22/13

**Charge [5]: Develop a clear definition for “uneviscerated fish” or “viscera” as it would relate to uneviscerated fish. This definition should resolve issues concerning gills, gill rakers, milt, roe and all other fish internal organs.**

**Discussion:** A definition has been written and placed in the revision of the AFDO Guidance Document, “Cured, Salted, and Smoked Fish Establishments Good Manufacturing Practices, including *Listeria monocytogenes* Control Manual.” The revision has not yet been finalized. The definition is listed below.

Evisceration is the complete sanitary removal of the contents of the stomach cavity contents and gill region of finfish and the complete sanitary removal of the contents of the mantle and head of cephalopods.

**Finfish evisceration:** Evisceration shall be completed via the slicing of the stomach cavity from the anus

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to collar. Evisceration includes but is not limited to the complete removal of the esophagus, organs, intestines, gas bladder, milt/roe sacs, peritoneum, dorsal aorta, blood, extraneous matter, etc ventral of the vertebral column in finfish. Proper finfish evisceration shall leave only flesh, fat and bone on the walls of the stomach cavity upon final rinsing. All gill arches including gill rakers and gill filaments shall be removed leaving only the gill plate and collar upon final rinsing.

**Cephalopod evisceration:** Evisceration shall be completed via removing all contents of the mantle with the head being fully removed. Evisceration shall leave only flesh within the mantle upon final rinsing. Cephalopod heads shall be sliced open removing the beak and all extraneous matter.

**Recommendation:** To use this definition of uneviscerated fish as written in the upcoming revision of the AFDO Guidance document referenced above.

**Executive Committee Action:** Disapproved pending formal opinion from FDA. AFDO to submit a letter to FDA.

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