
ASSOCIATION OF FOOD AND DRUG OFFICIALS

2013

RESOLUTION NUMBER 2013-3

Submitted by: AFDO Executive Board

Date: April 4, 2013

Concerning: Uneviscerated Processed Fish

Whereas, uneviscerated processed fish that is salt cured, dried, or smoked can be dangerous, and is addressed by FDA Compliance Policy Guide 540.650 which declares it to be an adulterated food due to the potential for botulism toxin development in the viscera of the fish, and

Whereas, clandestine sale of uneviscerated processed fish is difficult for regulatory agencies to fully address with traditional inspection resources because of challenges associated with determining the product source, and

Whereas, community perception of regulatory action against uneviscerated processed fish is oftentimes unfavorable, and

Whereas, regulatory actions alone cannot address the issue and prevent future demand for uneviscerated processed fish, and

Whereas, community engagement has the potential to encourage self-regulation in immigrant communities and allow for education of both regulators and business owners, and

Whereas, conventional inspection and enforcement practices with ethnic food business owner operators selling illegal uneviscerated processed fish may not be an optimally effective approach for addressing this matter, therefore, be it

Resolved, that AFDO ask FDA to work with them to identify strategies for developing greater collaboration and communication between states (domestic inspections) and FDA (import operations) that could more efficiently remove illegal uneviscerated processed fish from the market, and be it further

Resolved, that AFDO request FDA to work with their state partners in local and national community engagement through joint development of educational programs, fact sheets, and training and outreach activities within existing community organizations.