



Seafood HACCP (Hazard Analysis and Critical Control Point) of Fish and Fishery Products

Processors, packers, or holders of **fish** or **fishery products** intended for wholesale must comply with **Seafood HACCP regulations** (21 CFR Part 123) in addition to current **Good Manufacturing Practices (GMPs)**.

The Seafood HACCP rule does not apply to:

- Retail establishments
- Harvesters and transporters of fish
- Preparation of fish for holding aboard fishing vessels



Per the Food and Drug Administration (FDA), **"Fish"** includes fresh or saltwater finfish, crustaceans, and other aquatic animal life (e.g., alligator, frog, turtle, jellyfish, sea cucumber, sea urchin, and their roe), excluding birds and mammals, intended for human consumption. A **"Fishery Product"** is **any human food in which fish is a characterizing ingredient**. Seafood HACCP requires processors to conduct a **Hazard Analysis** to identify and evaluate food safety hazards reasonably likely to occur without controls. See also FDA's Fish and Fishery Products Hazards and Controls Guidance for assistance in developing a HACCP plan.

Food Safety Hazards to Evaluate: (21 CFR Part 123.6(c))

 Natural toxins	 Food or color additives	 Microbiological contamination
 Pesticides	 Drug residues	 Allergens & chemical contamination
 Parasites	 Physical hazards	 Decomposition in scombroid toxin forming species

When the Hazard Analysis reveals one or more food hazards that are reasonably likely to occur, a written Seafood HACCP plan is required. The Seafood HACCP plan needs to be specific to the facility and to each kind of fish or fishery product processed at the facility. (21 CFR Part 123.6(b))

A Seafood HACCP Plan

must include: (21 CFR Part 123.6(c))

- ✓ List the Critical Control Points (CCP) for each hazard.
- ✓ List the Critical Limits for each CCP.
- ✓ List procedures and frequencies to monitor each CCP's Critical Limits.
- ✓ Include corrective action plans developed in response to deviations from a CCP.
- ✓ List Verification procedures and frequencies for each CCP.
- ✓ Provide a record keeping system that documents the monitoring of each CCP.

Training: (21 CFR Part 123.10)

Those responsible for developing, modifying, or reviewing the Seafood HACCP plan or its records must have formal HACCP training in fish and fishery product processing, or be qualified through job experience.



Common Hazards Controlled in a Seafood HACCP Plan:

Types of Fish & Fishery Products associated with the hazard:

Clostridium botulinum toxin formation	• Vacuum packed products • Hermetically sealed containers • Smoked fishery products
Parasites	• Products consumed without a process to kill the parasites
Histamine (Scombrototoxin)	• Tuna, mahi-mahi, marlin, mackerel, bonito, & bluefish
Source controls for microbial, chemical and toxin contamination	• Raw Molluscan Shellfish • Aquaculture (farm) raised fish
Listeria monocytogenes pathogen growth	• Ready to eat, refrigerated fishery products
Staphylococcus aureus toxin formation	• Brining fish without refrigeration • Using unrefrigerated batters
Bacillus cereus toxin formation	• Cooked rice: refrigerate or acidify

How to get licensed as a Seafood Processor:

- ☐ Submit WSDA Food Processor Application
- ☐ Receive Seafood HACCP training / have HACCP job experience
- ☐ Conduct a Hazard Analysis
- ☐ Create & implement a written HACCP Plan
- ☐ Develop & keep HACCP plan records
- ☐ Document 8 Key Areas of Sanitation monitoring

Allergen Labeling:



Fish is considered a major food allergen. Identify the specific species of fish on the label. (Salmon, Bass, Trout)



Crustacean shellfish are considered major food allergens, and the species must be listed on the label. (Crab, lobster, shrimp)



Molluscan shellfish (oysters, clams, mussels, scallops) are not considered major food allergens.

Processing different fish and fishery products with shared equipment?



The FDA does not require allergen cross-contact controls (cleaning) in between processing different finfish when using shared equipment..



Allergen cross-contact controls (cleaning) are required between processing crustacean species and finfish species when using shared equipment.



Allergen cross-contact controls are required between processing crustacean or finfish species (allergens) and molluscan shell-fish (non-allergen) when using shared equipment.



8 Key Areas of Sanitation: (21 CFR Part 123.11)



Safety of the water incl. water used to make ice



Proper labeling, storage, and use of toxic compounds



Condition and cleanliness of food contact surfaces



Control of employee health conditions



Prevention of cross contamination



Exclusion of pests from the food plant



Maintenance of hand washing, hand sanitizing, and toilet facilities



Protection of food from chemical, biological, and physical contaminants

Sanitation Standard Operating Procedures (SSOPs) (21 CFR Part 123.11)

Each processor should implement a written Sanitation Standard Operating Procedures addressing the 8 Key Areas of Sanitation. These areas must be monitored during processing, with monitoring and corrective actions documented.

Seafood HACCP Links



[WSDA Seafood HACCP Consumer Protection Criteria](#)



[21 CFR Part 123 Fish and Fishery Products](#)



[FDA Fish and Fishery Products Hazards and Controls Guidance](#)

