

2014 Wisconsin Aquaculture Association Conference
Fox Hills Resort, Mishicot

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Division of Food Safety

Businesses in Wisconsin

- **2800+** licensed or registered fish farms
- **46** licensed seafood or fish processors



Regulations governing Aquaculture and Fish Processing operations

- State Statute Chapter 97
- ATCP 70 or ATCP 75
- Title 21 CFR 123



Licensing required or exempt?

Aquaculture is **not licensed** when:

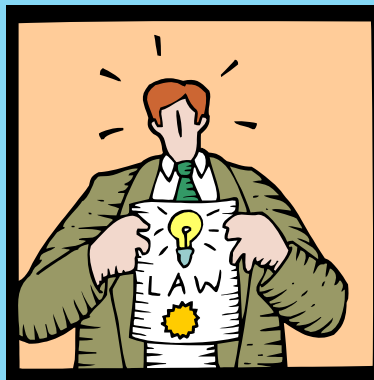
- Fin fish are raised for fee fishing where the customer pays a fee to catch fish and the operator may behead, eviscerate and fillet the fish as a service to the paying customer
- Fish are raised and sold live from a hatchery
- Fish are raised and sold as bait

DFS **will license** and inspect stationary and mobile Aquaculture businesses when they conduct food processing activities as defined in ATCP 70.02(16) or ATCP 75 including:

- Processing fish into human food for sale
- When the operator catches and stores headed and eviscerated fish to provide a fee fishing customer fish if they have failed to catch their own
- When the operator catches, cleans and fillets fish to sell to customers that visit the farm/ranch.

Fish & Fishery Products HACCP System Review Procedures

ATCP 70.18 states that “Fish processing plant operators shall have HACCP plans that comply with 21 CFR 123 and address food safety hazards that may occur in fish processing.”





Wisconsin Department of Agriculture, Trade and Consumer Protection
 Division of Food Safety
 PO Box 8911, Madison WI 53708-8911
 Phone: (608) 224-4682

Application for Review of a Seafood HACCP Plan

Mail Completed Application with Supporting Documentation to: WDATCP-DFS, PO Box 8911, Madison, WI 53708-8911

For additional information please contact the Wisconsin Department of Agriculture, Trade and Consumer Protection office in Madison at (608) 224-4682

Business and Contact Information			
FIRM NAME (DBA)		<input type="checkbox"/> New <input type="checkbox"/> Existing	
RESPONSIBLE PERSON	SEAFOOD HACCP TRAINED INDIVIDUAL		
MAILING ADDRESS STREET	CITY	STATE	ZIP
PHYSICAL ADDRESS (if different from mailing address)	CITY	STATE	ZIP
PHONE	E-MAIL		

HACCP Plan Submission Requirements	
Species of fish, fishery product and packaging method	<input type="checkbox"/>
Process flow diagram	<input type="checkbox"/>
Hazard Analysis	<input type="checkbox"/>
Plan to include the following:	
Critical control points for each of the identified food safety hazards that is reasonably likely to occur	<input type="checkbox"/>
Critical limits for each critical control point identified	<input type="checkbox"/>
Monitoring procedures and frequency for each critical control point identified; (what, how, who & when)	<input type="checkbox"/>
Specific corrective action plans for deviations from critical limits at each critical control point;	<input type="checkbox"/>
Verification procedures to include appropriate frequencies of verification activities; e.g. records review, calibration, etc.	<input type="checkbox"/>

Recommended Resources:

All Seafood HACCP systems must meet the requirements of 21 CFR PART 123 Fish and Fishery Products; these requirements and explanatory information that will help in meeting them are found in the current edition of Fish and Fishery Products Hazards and Controls guidance and the web-based resources listed.

Seafood HACCP Regulation - 21 CFR Part 123 – Fish and Fishery Products
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=123&showFR=1>

Fish and Fishery Products Hazards and Controls – 4th Edition
<http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Seafood/ucm2018426.htm>

Training Courses <http://www.afdo.org/seafoodhaccp>

Seafood HACCP Training and Education, HACCP Templates and Examples - Florida Sea Grant
http://flseagrant.org/index.php?option=com_content&view=article&id=279%3Aseafood-haccp-alliance-publications&catid=45%3Aseafood-production-and-safety&Itemid=64

Generic HACCP Forms and Plans, Seafood Network Information Center – Seafood NIC
<http://seafood.ucdavis.edu/seafoodhaccp.html>

Fish & Fishery Products HACCP System

Review Procedures

WDATEP Technical Services Section will complete a review of seafood HACCP plans

Required components include:

- 1) Firm Information
- 2) A list of each species of fish and fishery product processed or stored; finished products and the packaging method for each product.
- 3) Process Flow Diagram for each product.
- 4) Hazard Analysis for each product
- 5) HACCP Plan for each product or group of related products :
 - ✓ Critical control points for each of the identified food safety hazards;
 - ✓ Critical limits for each critical control point identified;
 - ✓ Monitoring procedures and frequency for each critical control point identified;
 - ✓ Specific corrective action plans for deviations from critical limits at critical control point;
 - ✓ Verification procedures to include appropriate frequencies of verification activities;

Fish & Fishery Products HACCP System

Review Procedures

Sanitarian On-Site Inspection:

After receipt of the review letter the Sanitarian will conduct an on-site inspection.

1) Confirm the accuracy of the process flow diagram during walk-through verification.

- ❖ Process steps, product specifications, equipment, or processing parameters are not identified, document in the inspection report

2) Review the HACCP plan and recommend adjustments

- ❖ Does each CCP have hazards properly identified?

- ❖ Is each critical limit and corrective action appropriate, effective and based on current hazards guidance or other science –based documents?

- ❖ Monitoring records available and reviewed as required?

- ❖ Verification records available and reviewed as required?

3) Document all violations/deviations of the HACCP plan in the inspection report, outlining corrective actions as appropriate.

Fish & Fishery Products HACCP System Records Retention by Facility

Food Sanitarian may ask to review the following:

- ❖ Review Letter
- ❖ Certificate of Trained Person
- ❖ Fish & Fishery Product List
- ❖ Process Flow Diagram
- ❖ Hazard Analysis
- ❖ HACCP Plan
- ❖ Last Inspection Report



Mobile Fish Processors

None currently in Wisconsin/not allowed

Industry interest/opportunity

Working together to bring about change



Mobile Fish Processors

Anticipated Requirements

- The mobile fish processing operation shall be licensed as a food processing plant
- Notification to WDATCP of intent to employ mobile fish processor
- Pre-operational inspection at each farm and approval in writing granted by department before processing begins.
- Inspection results and a copy of the approval maintained by both the mobile processor and the aquaculture farm owner.
- The aquaculture farm shall provide the mobile processing operation with a potable water supply to which a sanitary connection can be made.
- The aquaculture farm operator shall provide acceptable restroom facilities for employees of the mobile fish processing operation.

Mobile Fish Processors

Anticipated Requirements

- Wastewater and solid wastes generated shall be disposed of in an acceptable manner:
 - ✓ temporary holding and proper field-spreading in accordance with DNR rules,
 - ✓ transfer to an existing approved waste collection system in accordance with DNR rules,
 - ✓ transfer to a municipal waste treatment system in accordance with state rules and local/county zoning regulations,
 - ✓ transfer to a private sewer system in accordance with local/county zoning regulations.
- fish processing operation shall process in a manner that prevents contamination of packaging materials, food contact surfaces, or fish products with insects or debris from the external environment.

Mobile Fish Processors

Questions to consider

Who is selling the final product and who needs a license? This person will be responsible for recalls should they be required.

Who is responsible for the safety of the end product? May need a signed agreement between fish farm owner & Processor.

How will the mobile unit be identified? Will need a unique ID number on the “unit”.

What types of processing will be allowed? Is this just cleaning fish, or does it involve other processes (brining, smoking, curing, freezing, canning)?

What types of fish will be processed? Keep in mind, a HACCP plan is required for each species of fish and process. Histamine forming fish?

Questions ??

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