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# Seafood HACCP regulation: A perspective

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## Effectiveness of the Seafood HACCP Alliance

The seafood industry was one of the first food commodities in the United States to be regulated under a mandatory Food and Drug Administration (FDA) Hazard Analysis Critical Control Point regulation. HACCP regulation 21CFR123 required affected firms to perform a hazard analysis of their products and operations and prepare an HACCP plan if any hazards were found. Regulators and educators were concerned with the industry's ability to comply with the regulation, since most seafood firms are small businesses that are not highly capitalized, lack technical staffs and are not geographically concentrated.

In order to inform the industry and improve compliance, the Seafood HACCP Alliance was formed. The alliance was a cooperative venture among several Sea Grant and Land Grant educational institutions, government agencies (FDA, National Marine Fisheries Service and U. S. Department of Agriculture), professional organizations (Association of Food and Drug Officials and its regional affiliates), and trade associations (National Fisheries Institute, National Food Processors Association).

The alliance developed a three-day instructional curriculum and a series of educational materials. The Seafood HACCP Alliance also established a "Train-the-Trainer" program to provide a cadre of educators to present standardized educational programs throughout the country at a reasonable cost, since any

program offered at a cost exceeding \$100 required justification. Alliance course participants received an Association of Food and Drug Officials certificate, with their name retained in a permanent file by the organization.

## Ensuring seafood safety

While there has been some criticism relative to the degree of the industry's compliance with the HACCP regulation, there is a general consensus among educators and regulators that tremendous strides have been made in ensuring the safety of fish and fishery products as a result of the regulation. Ken Gall, New York Sea Grant seafood specialist at Cornell University, conducted a survey of seafood firms to determine the effectiveness of the Seafood HACCP Alliance courses.

## Survey results

It was noteworthy that 77 percent of the firms believed they would not have been able to comply with the FDA regulation without participation in a Seafood HACCP Alliance three-day course. Also, over 90 percent of the respondents reported the alliance training course provided the information they needed to develop an HACCP plan, understand FDA's guidance information, and comply with the FDA seafood HACCP regulation.

The alliance's curriculum and materials were rated highly effective, with 88 percent of the surveyed firms reporting that their employees were able to prepare their HACCP plans after completing the course. Survey respondents indicated that other elements of the course, including food safety and sanitation, were also important topics (Fig. 1).

As with any new legislation, many firms had difficulty preparing and implementing acceptable HACCP plans. A one-day Encore program was developed and offered to those firms found to be in non-compliance after a regulatory inspection.

**Question: What was the most important thing that you learned in the HACCP course?**

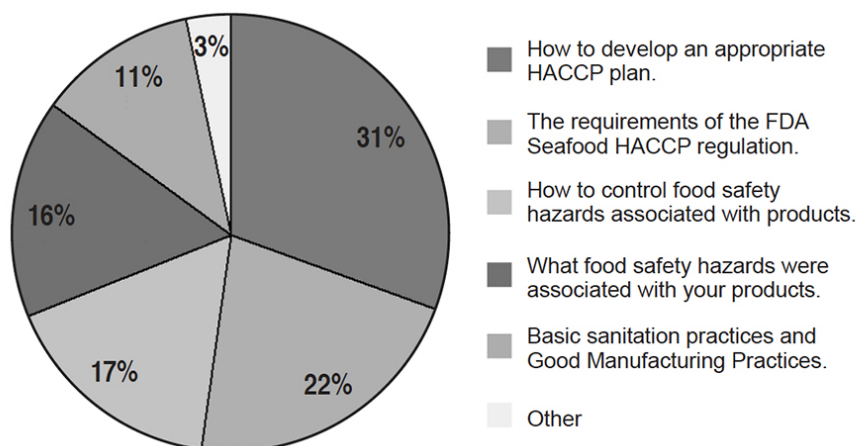


Fig. 1: Percentages were calculated from 1,371 respondents. K. Gall, Seafood Industry HACCP Implementation Survey, Seafood HACCP Alliance, 1999. The survey included wholesalers, distributors, and processors in 35 states and U.S. territories.

## Conclusion

The Seafood HACCP Alliance, a coalition of educational, professional, government and trade organizations, was highly effective in building compliance with the HACCP program. A similar coalition might be helpful in building awareness and implementation of the GAA Responsible Aquaculture Program and Eco-Label.

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