

## ATTENTION READERS (March 2017)



This edition of *Sanitation Control Procedures for Processing Fish and Fishery Products* (SGR 119, First Edition 2000), developed by the National Seafood HACCP Alliance, remains the recognized curriculum that accompanies Sanitation Control Procedures certificate courses offered through the Association of Food and Drug Officials in accordance with the Seafood HACCP Protocol.

Over the years the Seafood HACCP Alliance has assessed whether or not to update this book and each time has decided “no.” While some of the technical background information may have evolved, this is not a basic sanitation manual. The purpose of this training is to assist processors in developing and implementing Sanitation Control Procedures as mandated by the U.S. Food and Drug Administration Seafood HACCP regulation (21 CFR 123.11). FDA’s expectations of compliance with 123.11 have not changed over the years; therefore the materials addressing the main purpose of the training have not required updating.

Recently however, FDA has updated the Current Good Manufacturing Practice regulations, or GMPs, as part of a broader modernization of food safety regulations. By 2018, 21 CFR Part 117 – Subpart B-Good Manufacturing Practices will replace 21 CFR Part 110 Good Manufacturing Practices. (Implementation of the changes has been phased in since 2016 depending on the size of the firm.)

Please be advised that the regulations cited as 21 CFR 110 have been changed to 21 CFR 117, Subpart B. Any reference in this book to 21 CFR 110 should be adjusted to the appropriate section in 117. The table below provides the corresponding adjustment. A reprint of the revised GMP regulation is also available in Appendix 3 of the newly revised *Hazard Analysis and Critical Control Point Training Curriculum*, the Seafood HACCP Alliance “Blue Book.” The regulation is also available at [www.gpo.gov](http://www.gpo.gov).

Old 21 CFR 110	New 21 CFR 117 – Subpart B
§ 110.3 Definitions	§ 117.3 Definitions
§ 110.5 Current good manufacturing practice	§ 117.1 Applicability and status
§ 110.10 Personnel	§ 117.10 Personnel
§ 110.20 Plant and grounds	§ 117.20 Plant and grounds
§ 110.35 Sanitary operations	§ 117.35 Sanitary operations
§ 110.37 Sanitary facilities and controls	§ 117.37 Sanitary facilities and controls
§ 110.40 Equipment and utensils	§ 117.40 Equipment and utensils
§ 110.80 Processes and controls	§ 117.80 Processes and controls
§ 110.93 Warehousing and distribution	§ 117.93 Warehousing and distribution
	§ 117.95 Holding and distribution of human food by-products for use as animal food
§ 110.110 Natural or unavoidable defects in food for human use that present no health hazard	§ 117.110 Defect action levels

### Impact of GMP revisions to Seafood HACCP and Sanitation Control Procedures

One notable change in the GMPs is that FDA’s longstanding position that GMPs address the prevention of allergen cross-contact is now explicit in the revised regulatory text. The agency has made a distinction between “cross-contamination” and “cross-contact.”

**Cross-contact** – unintentional incorporation of food allergens into food.

**Cross-contamination** – contamination of food with bacterial, chemical or physical hazards.

Controls addressing allergen cross-contact may be incorporated into aspects of sanitation control procedures that are the subject of this training curriculum. Chapter 2 of the Seafood HACCP Alliance Blue Book curriculum demonstrates the relationship between the GMPs and 21 CFR 123.11 – Sanitation Control Procedures. Examples of updated monitoring forms are also available in Chapter 2 of the Blue Book.

Technical information on developing allergen cross-contact prevention programs is widely available through publications and websites.