



Alaska Department of Environmental Conservation

Alaska Seafood Processors Advisory Council Meeting In conjunction with the Pacific Fisheries Technologists' 62nd Annual Meeting

February 13, 2011

3:00 P.M. – 4:00 P.M PST

(2 P.M. – 3 P.M. Alaska Time)

Location: Coast Plaza Hotel, 1763 Comox St., Vancouver, BC - PFT hospitality room. Check with front desk for room number.

Meeting was called to Order at 3:00pm.

Robert Presley welcomed everyone in attendance and on the telephone.

Those in attendance included Robert Pressley, Kenny Lum, John Lin, Larry Dutton, Liz Best, Bob Culleeny, Jeff Backlund, Joe Frazer & Hart Schwarzenbach.

On the telephone were Ron Klein, Brian Himelbloom & Lisa Petro.

Old Business

- Update on Ceilings Workgroup's 1st Meeting

Robert updated everyone on the results of the Ceilings Workgroup. The ceilings workgroup held its first meeting earlier in the day starting at 1:30pm and was concluded just prior to starting the ASPAC meeting. The workgroup included Jeff Backlund, Joe Frazer, Hart Schwarzenbach, Larry Dutton, Kenny Lum and Robert Pressley. The workgroup formulated potential language to clarify the definition of ceilings and walls for review by ADEC. The language will address the need to maintain walls and ceilings to avoid cross contamination by utilizing maintenance and verification records while maintaining consistency with FDA 21 CFR Parts 110 and 123. Kenny will provide a language draft to the working group for approval and transmittal to Robert for the departments' consideration as a suggested amendment to the seafood processing and inspection regulations. This draft will focus on avoiding redundancy to existing federal regulations.

- Update on "approved processes"

Kenny wanted to make sure that the position drafted by SPA from the past ASPAC meeting in regards to what is and is not an approved process met with ADEC satisfaction. In the last meeting it was cited that as ADEC requires a HACCP plan which should include the scientific basis for the process being used and should satisfy ADEC concerns about the safety of the process. Robert indicated that he has not looked into this yet but they want to make sure that a processor does not start producing a ready-to-eat (RTE) product that is not safe. Kenny and Robert will stay in contact as Robert reviews this policy. There was further discussion from the group regarding the Alaska Seafood Processing Regulations (ASPRs) section pertaining to approved processes. How is the HACCP plan verified or is verification necessary? Currently, submittal of HAs and any subsequent HACCP plans by firms with their permit application to the state is not required; rather the firms

must promise to conduct a HA and develop resulting HACCP plan(s) if needed prior to processing that product. Currently, ALL smoked or smoked flavored seafood products require approval by the dept because of potential food safety hazards, and all RTE seafood products produced by an unapproved process (other from a recognized processing authority, or other study) must first be tested as validation of food safety, prior to distribution. Some members felt the idea of approving processes is outdated, if a firm has constructed a HACCP plan, that is, by default, "approval"; and that only LACF products need validation from a process authority, so this is one area of the FIR that needs to be looked at very closely. If the state wants to (retain) the ability to approve new plants or processes, then this would mean that they would need to approve HACCP plans, both of which make the state liable if there is a failure in food safety. To the above points there was disagreement and discussions. Some members felt that the state is presently using this section for a target group but the real question becomes "if your target companies are not following the regulations now, a change in regulation will not improve this in the future".

New Business

- Food Defense/FASCAT

Ron Klein updated the group regarding Food Defense. ADEC hosted a Food and Agriculture sector Criticality Assessment of Alaska's seafood sector on December 16, 2010. According to DHSS "FASCAT provides a means to identify sector elements and systems that are critical to key state commodity chains or food distribution systems, and a method for further state or private sector vulnerability assessment and possible protective measure (s) or mitigation strategy development. Additionally, it provides a means to document and improve the characterization of a state's food and agriculture sector risk profile, and a structure for response to future DHS national data calls for information on critical food and agriculture infrastructure components". FASCAT was completed but Ron needs to finish this analysis before sending out to the participants for review. ADEC has made the Department of Homeland Security's "See Something, Say Something" food defense posters electronic file available for food processing firms through SPA.

- Status of 18 AAC 34. Alaska Seafood Processing Regulation Revisions

Robert Presley informed the group that the ASPRs are now being reviewed and will be updated in the near future. 18 AAC 34.080 will be updated to include ozone as a form of water disinfection. ADEC is still looking at what parameters will need to be set for Ozone. ADEC appreciated the SPA and the ozone industry for providing them with a comprehensive study and presentation in order to assist ADEC in reaching this decision.

Open Comments

- FDA Food Safety Modernization Act of 2011 (FSMA)

Ron Klein provided an update regarding the FSMA and how this may impact ADEC. He has been working with FDA on development of an integrated food safety system. FDA has formulated work groups which include federal, state, territorial, local and tribal agency staff to address critical infrastructure needs such as training, information management, coordinated workplans, and outbreak investigations. FDA and State Manufactured Food Programs have developed 10 regulatory

standards in order to provide uniform implementation and consistency between agencies which will have a positive impact on consistency and uniformity of state and federal programs. Some parts of the FSMA implementation process may be delayed if funding is not available. This should not have an impact on the seafood industry as they have had HACCP requirements for some time now but it will impact those food industries that will now be required to maintain HACCP plans.

- **FDA Hazard Guide**

Hazard guide should be out on or about April 1st. FDA is planning an informational broadcast and the Seafood HACCP Alliance is developing revised training.

- **Technical Assistance**

Joe Frazer brought up concerns over universities either cutting or reducing extension/advisory programs. This was recognized as a weakness by ADEC who pushed hard to ensure that the Marine Advisory Program was not cut in the latest program review conducted at one university but this may not work in the future. It was agreed that ASPAC should act as a strong voice for the seafood industry in Alaska to ensure that such programs as MAP are maintained and funded.

Adjourn

The meeting was adjourned by Robert Pressley at 4:13pm.