

May 1, 2017

Hazard Analysis and Critical Control Point Training Curriculum

(5th Edition, SGR 127, revised 2011)



Attention Readers:

Although a new edition of *Hazard Analysis and Critical Control Point Training Curriculum* (SGR 127) is anticipated in 2017, you can continue to use this 5th edition to help develop and implement seafood HACCP programs as mandated by the U.S. Food and Drug Administration Seafood HACCP Regulation (21 CFR 123). This one-page addendum explains the few new additions and minor formatting improvements anticipated in the upcoming 6th edition.

The current 5th edition (2011) developed by the National Seafood HACCP Alliance for Training and Education remains the recognized curriculum that accompanies the certificate courses offered through the Association of Food and Drug Officials in accordance with the Seafood HACCP Protocol for Training. The purpose of the training is to assist processors and related staff with developing and implementing HACCP programs.

A few additional requirements have been added to or modified in the Seafood HACCP Regulation in response to passage of the Food Safety Modernization Act (FSMA). The largest number of additional requirements are outlined in the *FSMA Final Rule for Preventive Controls for Human Foods*.

Specifically, FDA updated the Current Good Manufacturing Practice regulations (cGMPs 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.

Please be advised that the regulations cited in this book as GMPs 110/21 CFR 110 have been changed to GMPs 117/21 CFR 117, Subpart B. The table below provides the corresponding adjustment.

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 on Seafood HACCP and This Edition of the Training Curriculum (SGR 127)

There are 2 notable changes to GMPs that have been incorporated into Chapter 2 of the new edition:

- 1) The general provisions of the GMPs call for employee training in food safety and food hygiene. There are no prescribed courses, but the training must be documented in records.
- 2) 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 part of the food safety system prerequisites discussed in Chapter 2 of this book. Technical information on developing allergen cross-contact prevention programs is also widely available through publications and websites.

