Seafood Processors & FSMA

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- **Subpart A** – General Provisions
- **Subpart F** – Record requirements for training records in Subpart A.
- **Subpart B** – Current Good Manufacturing Practice (cGMP)
General Provisions

• Qualifications of individuals who manufacture, process, pack, or hold food
  – Management **must** ensure individuals are qualified
    • Have education, training, or experience... as appropriate to the individuals assigned duties; and
    • **Receive training** in the principles of food hygiene and food safety...
General Provisions

- Qualifications of supervisory personnel and responsibilities must be clearly assigned.
- Qualification of supervisory personnel might be gain by education, training, or experience.
General Provisions

• Records that document training of individuals who manufacture, process, pack, or hold food must be established and maintained.
Record requirements for training records

- Kept in original, true copies, or electronic records.
- Contain actual values and observations.
- Be accurate, indelible, and legible.
- Created concurrently.
Current Good Manufacturing Practice

- Very similar to old GMP’s under 21 CFR 110.
- Prevention of **Allergen cross-contact**.
- Human foods by-products for use in animal foods.
## Compliance dates

<table>
<thead>
<tr>
<th>Size of business</th>
<th>Compliance date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very small business*</td>
<td>September 17, 2018</td>
</tr>
<tr>
<td>Small business*</td>
<td>September 18, 2017</td>
</tr>
<tr>
<td>All other businesses</td>
<td>September 19, 2016</td>
</tr>
</tbody>
</table>

* As defined in 21 CFR §117.3

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Thanks!!!

QUESTIONS???