

IS MERCURY IN FISH A SIGNIFICANT HAZARD REQUIRING HACCP CONTROLS?

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The USFDA Seafood HACCP Regulation (21 CFR Part 123) requires that every processor of seafood that enters commerce in the United States conduct a hazard analysis and write and implement a HACCP plan (hazard analysis critical control point food safety system) to control significant food safety hazards that are defined as reasonably likely to occur in the absence of controls. The Seafood HACCP Alliance is an organization of seafood scientists from academia, industry and government, including NOAA and the FDA. The Alliance has developed curricula and programs to train industry personnel to develop HACCP plans to meet this requirement. The FDA-CFSAN has published the Fish & Fisheries Products Hazards & Controls Guidance, now in its third edition, to facilitate both the training and control of food safety hazards in seafood products. The guidance chapter on Methyl Mercury maintains the FDA action level of 1.0 ppm in edible tissue (Compliance Policy Guide section 540.600), but does not suggest critical control points, critical limits, monitoring procedures or other control strategies that are stated for the other potential hazard categories in the Guide. The Guide provides tables of fish and shellfish species-related hazards as guidance for potential hazards in specific types or species of seafood. Mercury is not identified as a potential food safety hazard in any of the seafood species listed. Thus, the four species that the “2004 FDA/EPA Consumer Advisory: What You Need to Know About Mercury in Fish and Shellfish” recommends to avoid – swordfish, shark, king mackerel, and tilefish – are not identified as associated with the potential hazard of mercury in the FDA Fish & Fisheries Products Hazards & Controls Guidance.