



Australian Government

Australian Quarantine and Inspection Service

Validation and Verification

A Guideline to Compliance with the

Export Control (Fish & Fish Products) Orders

2005

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Background

The *Export Control (Fish & Fish Products) Orders 2005* (the Orders) together with the *Export Control (Prescribed Goods General) Order 2005* (the PGGOs) and the *Export Control Act 1982* (the Act) provide conditions and restrictions on the export of fish and fish products.

Prior to the 1st of October 2005, fish and fish products for export were regulated under the *Export Control (Dairy, Eggs and Fish) Orders 2005* – these Orders have now been separated into the *Export Control (Fish & Fish Products) Orders 2005*, the *Export Control (Egg & Egg Products) Orders 2005* and the *Export Control (Dairy & Dairy Products) Orders 2005*.

Objectives

The objectives of the Orders are to facilitate trade based on effective food safety and suitability procedures and accurate descriptions of product. Audit provisions are required to substantiate the adequacy of these procedures. On this basis, certification is provided as required by importing countries, thereby facilitating trade.

This guideline specifically addresses the requirements of registered establishments to meet objective 3.1 (a) and (c) of the objectives of the Orders.

Export Control (Fish & Fish Products) Orders 2005 – Order 3

3. Objectives of these Orders

The objectives of these Orders are to facilitate trade by ensuring the following:

(a) that fish and fish products for export are fit for human consumption or are manufacturing grade fish and fish products and are identified as manufacturing grade for export for further processing;

(c) that fish and fish products for export as food meet importing country requirements;

This guide explains what the terms “validation” and “verification” mean and why it is necessary to include validation and verification in your Approved Arrangement. Guidance is provided on what needs to be validated and verified and how frequently. Examples are included for a range of fish commodities and processes.

1.0 Introduction

There are a range of conditions and restrictions on the export of fish and fish products, including the requirement for verification and validation – this means that fish and fish products cannot be exported unless they met the requirements for verification and validation as laid out in the *Export Control (Fish & Fish Products) Orders 2005*.

Validation specifically relates to the HACCP component of the Approved Arrangement. Validation is primarily associated with activities that evaluate the scientific and technical basis for the controls in the HACCP Plan.

Verification is focused on the activities that are required to determine if the Approved Arrangement is being complied with. Separate guidelines have been prepared to explain Approved Arrangements and HACCP. This guideline focuses on validating your HACCP Plan and verifying your Approved Arrangement.

2.0 Validation

2.1 What is validation?

The *Export Control (Fish & Fish Products) Orders 2005* define validation. Simply put, validate means – “How do I know that the critical limits / controls in my HACCP plan will result in safe food?”

Export Control (Fish & Fish Products) Orders 2005 – Order 8

Validate means provide evidence to demonstrate the effectiveness of a system of controls.

Validation evidence may be sourced in several ways:

- By providing or citing reliable data from a authoritative source

For example: Both FSANZ and the *Export Control (Fish & Fish Products) Orders 2005* cite a temperature range of between -1°C and 5°C as a validated critical limit at which to safely hold chilled product.

- By conducting trials of your processes and then testing the product to ensure that it continues to meet the required product standard – thereby demonstrating the effectiveness of a system of controls

2.2 Why is validation required?

Validation is necessary to meet AQIS requirements and to ensure that the selected controls (Critical Limits) will have the intended effect of reducing or eliminating hazards.

International best practice with HACCP includes validation, and some trade partners such as the European Union already require validation. It seems likely that more trade partners will also require validation in the future.

2.3 What needs to be validated in my Approved Arrangement?

The legislation requires that the following controls be validated:

A) The preservation methods used

Export Control (Fish & Fish Products) Orders 2005 – subclauses 24.1 – 24.2 of Schedule 5

24.1 Unless otherwise specified in this Part a process applied to fish and fish products for export as food for the purpose of extending its shelf life must ensure the safety of the fish and fish products concerned by:

- (a) destroying or preventing the growth of pathogens; or
- (b) reducing their growth to a level that ensures the microbiological safety of the fish and fish products is not adversely affected.

24.2 The applicable approved arrangement must validate that process controls for extending the shelf life of the fish and fish products ensures that the objective specified in subclause 24.1 is met.

This means that those steps in the Approved Arrangement that **extend the shelf life** of the fish and fish products need to be validated. The term “extend the shelf life” is not defined in the Orders, however this means making the fish and fish products last longer – to preserve the fish and fish products. Preservation steps include, but are not limited to:

- Chilling
- Freezing
- Drying
- Smoking
- Salting
- Canning
- Heat treatments (cooking, pasteurising, etc)

2.4 Examples of validation evidence

Six examples of validation are provided in [2.6 – Examples of validation](#)

- Example 1 – Live fish (eg. lobster, eels, fish, oysters etc.)
- Example 2 – Chilled finfish
- Example 3 – Frozen raw crustacea
- Example 4 – Dried Beche-de-Mer
- Example 5 – Salted roe
- Example 6 – Cooked crustacea

B) The rate of chilling

Export Control (Fish & Fish Products) Orders 2005 – subclauses 19.1 – 19.2 of Schedule 5

19.1 The chilling of fish and fish products must be performed with sufficient rapidity so as to minimise the growth of pathogens that could adversely affect the fitness for human consumption of the fish and fish products given the conditions under which they are to be stored, handled loaded and transported.

19.2 The applicable approved arrangement must validate that the rate of chilling achieves the outcomes specified in subclause 19.1.

The *Export Control (Fish & Fish Products) Orders 2005* provides validated critical limits to which fish and fish products must be chilled – that is to between -1°C and 5°C (subclause 18.1 of Schedule 5). However the time taken to chill down product (chilling rate) to within the Critical Limits is also an important factor in minimising the growth of potentially harmful pathogens.

Product testing can assist in determine the effectiveness of your specified chilling rate. If your chilling rate is effective – then test results will show that your finished product meets the required Product Standards – you will have validated that your handling of the product has not caused it to be adversely affected.

For further information on Product Standards – see Schedule 6 and the AQIS Guideline – Product Standards – Verification testing for Sourcing and Handling Fish & Fish Products.

C) The rate of freezing

Export Control (Fish & Fish Products) Orders 2005 – subclauses 21.3 – 21.4 of Schedule 5

- 21.3 The freezing of fish and fish products must be performed with sufficient rapidity so as to minimise the growth of pathogens that could adversely affect the fitness for human consumption of the fish and fish products given the conditions under which they are to be stored, handled loaded and transported
- 21.4 The applicable approved arrangement must validate that the rate of freezing achieves the outcomes specified in subclause 21.3.

The *Export Control (Fish & Fish Products) Orders 2005* provides validated critical limits to which fish and fish products must be frozen – that is to -18°C or cooler (subclause 21.1 of Schedule 5). However the time taken to freeze down product (freezing rate) to within the Critical Limits is also an important factor in minimising the growth of potentially harmful pathogens.

Product testing can assist in determine the effectiveness of your specified chilling rate. If your chilling rate is effective – then test results will show that your finished product meets the required Product Standards – you will have validated that your handling of the product has not caused it to be adversely affected.

For further information on Product Standards – see Schedule 6 and the AQIS Guideline – Product Standards – Verification testing for Sourcing and Handling Fish & Fish Products.

2.5 How frequently do I need to validate the Critical Limits of my controls?

Validation of the preservation steps and chilling and freezing rates is usually a once-off event. However, it is recommended that validation information or results are re-validated at least annually and when there are changes that relate to the preservation steps within your HACCP plan.

Examples of changes include:

- Variation to the Critical Limits relating to the preservation steps
- Variation to the time taken to chill or freeze product
- New equipment being used or new processes being adopted
- The introduction of a new product or product changes
- Regulatory changes
- Changes to known importing country requirements
- New scientific evidence
- Extenuating or emergency circumstances.

Please note that under subclauses 18.1 and 18.2 of Schedule 2 of the *Export Control (Fish & Fish Products) Orders 2005* you may be required to notify AQIS in writing of any changes that may affect the safety of the product, compliance with the Orders or compliance with importing country requirements prior to you making the changes.

2.6 Examples of validation

Example 1 – Live fish (eg. lobster, eels, fish, oysters etc.)

Preservation Method: Nil

Critical Factor: Nil

Validation: No validation required

Explanation: Live fish do not have a preservation step, and therefore there is nothing to validate!

Example 2 – Chilled finfish

Preservation Method: Chilling

Critical Factor: Reduce product temperature between -1°C and 5°C .

Validation: Export Control (Fish & Fish Products) Orders 2005, subclause 18.1 of Schedule 5

Explanation:

The Orders provide a regulatory level for chilling temperature (between -1°C and 5°C). Where a regulatory level is provided, further validation of preservation steps is not required. Essentially, AQIS has determined that chilling to less than 5°C will ensure that the fish and fish products are safe.

Example 3 – Frozen raw crustacea

Preservation Method: Freezing

Critical Factor: Reduce product temperature to below -18°C .

Validation: Export Control (Fish & Fish Products) Orders 2005, subclause 21.1 of Schedule 5

Explanation:

The Orders provide a regulatory level for freezing temperature (minus 18°C or cooler). Where a regulatory level is provided, further validation of preservation steps is not required. Essentially, AQIS has determined that freezing to minus 18°C or below will ensure that the fish and fish products are safe.

Example 4 – Dried Beche-de-Mer

Preservation Method: Drying (Shelf stable – not refrigerated)

Critical Factor: Maximum finished product water activity (aw) is less than or equal to 0.85

Validation:

USFDA Fish and Fisheries Products Hazards and controls guidance 3rd Edition June 2001 – Chapter 14 and – Appendix 4 – Bacterial pathogen growth and inactivation

Explanation:

The United States of America Guideline for Fish and Fisheries Products Hazards and Controls Guidance, 3rd Edition, validates this water activity for dried foods.

Please note that there are other ways to validate dried fish and fish products.

AQIS recommends that you refer to the aforementioned USA guide – see <http://www.cfsan.fda.gov/~comm/haccp4x4.html>.

Example 5 – Salted fish roe

Preservation Step: Salting (shelf stable)

Critical Factor: 20% salt

Validation:

USFDA Fish and fisheries Products Hazards and controls guidance 3rd Edition June 2001 – Appendix 4 – Bacterial pathogen growth and inactivation

Compendium of Fish and Fishery Product Processing Methods, Hazards and Controls – Chapter 1

<http://seafood.ucdavis.edu/haccp/compendium/compend.htm>

Explanation:

The United States of America Guideline for Fish and Fisheries Products Hazards and Controls Guidance, 3rd Edition, validates this salt content for salted fish and fish products.

Please note that there are other ways to validate salted fish and fish products. AQIS recommends that you refer to the aforementioned USA guide – see <http://www.cfsan.fda.gov/~comm/haccp4x4.html>.

Example 6 – Cooked crustacea

Preservation Step: Cooking (combined with chilling or freezing)

Critical Factor:

Product cooked to specific time & temperature validated to ensure pathogen destruction

Validation:

Establishment to conduct trials (or engage someone to conduct them on their behalf) using microbiological sampling to validate time and temperature used

Or

Industry association trials to validate time and temperature used

Or

Reference published literature on trials conducted that is relevant to the time and temperature used

Explanation:

Validation of cooking is two-fold – the temperature is obviously important, but also the time that the fish and fish products is cooked for is also critical. Therefore validation of cooking must include the time – temperature combination that is used.

Useful references:

US FDA: <http://www.cfsan.fda.gov/~comm/haccp4x4.html>.

University of California – Davis Campus (UC Davis): <http://seafood.ucdavis.edu/>

Shelf Life Verification of Vacuum Packed & Modified Atmosphere Packaged (MAP) Products

Vacuum packing and MAP packaging is not considered “a process to extend shelf-life” under the *Export Control (Fish & Fish Products) Orders 2005* definition (subclause 30.2 of Schedule 5). This method of packaging is usually combined with a preservation process such as chilling in order to extend the shelf-life of the product.

However, as there are additional hazards that may be introduced to the product due to this method of packaging it is essential that controls be put in place to ensure that the product is safe and that these controls are validated. Critical Control Points for vacuum and MAP packing may include application of a Use by Date to ensure that the product is not consumed after its designated shelf life has expired. The stated shelf life indicated on the label must be initially validated to ensure that the product will be able to meet the required microbiological product standard at the end of the product shelf life.

Verification should include testing to ensure that the product continues meet the required microbiological product standard at the end of the product shelf life.

3.0 Verification

3.1 What is verification?

The *Export Control (Fish & Fish Products) Orders 2005* define verification. Verification means – “How do I know that my Approved Arrangement is being complied with?”

Export Control (Fish & Fish Products) Orders 2005 – Order 8,

Verify means apply methods, procedures, tests and other evaluations in addition to monitoring to determine whether a requirement is complied with.

Verification is different to monitoring. Monitoring is an integral part of HACCP, and involves regular observations or measurements to assess whether a specific Critical Control Point (CCP) is under control. Verification is broader than just the HACCP plan, and involves the entire Approved Arrangement.

3.2 Why is verification required?

Similar to validation, verification is necessary to meet AQIS requirements and is required to determine if the HACCP Plan and controls described in the Approved Arrangement are being complied with.

International best practice with HACCP includes verification, and some trade partners such as the European Union already require verification. It seems likely that more trade partners will also require verification in the future.

Many registered establishments already carry out some verification activities – such as product testing (chemical and microbiological) and water and ice sampling.

3.3 What needs to be verified?

Export Control (Fish & Fish Products) Orders 2005 – subclause 3.7 of Schedule 2

3.7 The HACCP plan must identify procedures used to verify compliance with the HACCP plan and the frequency with which these procedures are to be performed.

Export Control (Fish & Fish Products) Orders 2005 – subclauses 5.1 & 5.2 of Schedule 2

5.1 Whether the following are complied with must be verified:
(a) the applicable requirements of Division III of Part 3 of these Orders; and
(b) the importing country requirements identified in the approved arrangement

5.2 A written record must be made of:
(a) the methods, procedures, tests, monitoring and other evaluations used to verify compliance; and
(b) the results of the verification..

This means that compliance with the following needs to be verified:
Division III of Part 3 of the *Export Control (Fish & Fish Products) Orders 2005*

- The HACCP plan
- Importing country requirements
- Schedule 3 – Structural requirements
- Schedule 4 – Operational hygiene
- Schedule 5 – Preparation and transport
- Schedule 6 – Product standards
- Schedule 7 – Trade description
- Schedule 8 – Identification, tracing systems, integrity and transfer

Appendix 2 suggests the types of verification activities that can be undertaken for each of these elements.

3.4 Examples of verification

Verification activities may include:

Review of records

Regular review of records relating to the Approved Arrangement to ensure that:

- Monitoring is being conducted
- Critical Limits and procedural requirements are being met
- Records are being completed as required by the Approved Arrangement

For example: Calibration of measuring equipment is a support program and part of Good Manufacturing Practice. The Orders require that you document in the Approved Arrangement the controls or procedures that you will use to ensure that measuring equipment is accurately calibrated and the method that you will use to verify that this is complied with and are effective in ensuring that the measuring equipment is accurate (subclause 11.1 of Schedule 4).

As such you should include a procedure for checking and monitoring the accuracy of the equipment eg. Subclause 10.2 of Schedule 3 of the Orders requires an accuracy of $\pm 1^{\circ}\text{C}$ for thermometers, which is the critical limit. The accuracy of thermometers may be checked against a master thermometer or checked against an ice slurry and the results recorded as part of monitoring procedures.

Verification of calibration would require you to regularly review the records to ensure the above conditions are being met.

A Verification Schedule should be detailed in your Approved Arrangement that indicates which records you will be reviewing, how frequently, and what action will be taken if records are incomplete or incorrect.

Internal Audit and review of documentation

Regular internal audit and review of Approved Arrangement documentation and procedures to ensure that:

- Documentation meets the requirements for Approved Arrangements in the Orders (“Have we documented what we are doing correctly and is the information still current?”)

- Procedures are being conducted as documented (“Are we doing what we say we are doing?”)
- Records are being completed as required by the Approved Arrangement

In order to effectively audit the entire Approved Arrangement, internal audits of specific components may be scheduled. For example: Internal Audit of GMP programs or Staff Training procedures

Review of the HACCP Plan

Review of the HACCP Plan is a re-assessment of the HACCP plan for adequacy and changes and will include review of:

- Product Descriptions
- Flow Diagrams
- Hazard Analysis
- The HACCP Table
- Verification Schedule
- Validation – (“Re-Validation”)

Internal Audit of site, premises and equipment

Regular internal audit of site, premises and equipment to ensure that:

- Site, premises and equipment meet the requirements of Schedule 3

Internal audit is a process by which a registered establishment can check to ensure that all of the procedures it has in place as part of the Approved Arrangement have been correctly documented and are being followed as documented. Checklists are an efficient way of recording internal audit activities and ensuring that no areas have been missed.

Product testing / testing

Scheduled product testing / testing to ensure that:

- Control measures & Critical Limits are effective
- Finished product meets the required product standards / importing country requirements
- Testing of water, ice, raw materials

Sampling and testing are excellent verification tools, as they provide quantitative information about the level of a substance (eg. microbiological, chemical) in the fish and fish products and given that it is the fish that will be eaten – it verifies the safety of the fish and fish products for its end use.

Testing may also include testing of water and ice samples to verify that water is potable or testing product for chemical residues to verify that chemical treatment procedures are effective in ensuring a safe product that complies with product standards.

It is very important that each establishment reviews their test results, and the responsibility for this task is assigned to a person who understands the relevance of the test results.

The tests to be carried out and the critical limits for the tests should be included in your Approved Arrangement. This is important because laboratories won’t necessarily know the critical limits for the tests – and therefore won’t be able to tell you if the tests have passed or failed, or identify any unusual results.

Subclauses 8.1 and 8.2 and clause 4 of Schedule 6 provide further information on the methods by which sampling, analysis and examination must be carried out.

A separate AQIS guideline entitled “Product Standards - Verification testing for sourcing and handling of fish and fish products” has been prepared by AQIS, which details the minimum sampling and testing regimes for fish and fish products.

3.5 How frequently do I have to verify compliance with my Approved Arrangement?

The question really should be – “How much product am I prepared to compromise?” The less frequent the verification, the more products that may be compromised, and possibly ineligible for export.

Verification activities should be conducted regularly and the frequency, method and results of verification procedures must be documented.

As a guide, some suggested frequencies are provided in Table 1

Table 1. Example Verification Schedule

Verification Activity	Purpose	Suggested Frequency	Responsibility	Records
Review of Daily Calibration Check records	To ensure that Thermometers, scales & testing equipment are within calibration requirements	Weekly	Process Supervisor	Daily Calibration Check Records checked & initialled by Supervisor
External verification – calibration of equipment	To ensure scales and testing equipment are accurately calibrated	3 Monthly	Process Manager to arrange for external service	External Service Records held on file
Review of monitoring records	Reviewing of all monitoring records to ensure correctly completed & accurate	Weekly	Process Manager	All monitoring records Corrective Action Report as required
External verification – sampling and testing	Microbiological / chemical testing of finished product to ensure that it meets required product specifications	Refer to “Product Standards Guideline”	Process Manager to take samples and arrange for testing by approved Lab	Laboratory Reports, Test Results, Corrective Action Report as required
Review of HACCP Plan	To include review of: <ul style="list-style-type: none"> • Product Descriptions • Potential hazards • Flow Diagrams • CCPs and Control Measures • Critical Limits (Re-validation) • Corrective Actions 	Annual or when changes occur	Occupier, Process Manager, & supervisors as appropriate	Records need to be kept of all amendments made to the AA. Records should be kept of why changes made. Corrective Action Report as required
Internal Audit of GMP Programs and Product Handling Practices (Sourcing, storage, chilling, freezing etc. as per Sch. 5)	Review GMP programs & Product Handling Practices to ensure they are: <ul style="list-style-type: none"> • Effective • Documented correctly • Procedures are current and are being followed • Records are being kept as required 	Annually. As this is a large task – audit of individual parts of the program should be scheduled over a year	Process Manager or a nominated person within the business trained in Internal Auditing	Documented GMP & Product Handling Procedures and records Corrective Action Reports, Amendments recorded as required
Management Review Meeting	To review results of internal & external audits, results of corrective actions – As per Procedure for Management Review	Bi-annually	Occupier, Process Manager, Marketing Manager	Minutes of Management Review Meeting. Corrective Action Reports, Amendments recorded as required

* This Table has been included as an **example only** – there may be additional verification activities required to be listed depending on the scope of your Establishments operations and products.

3.6 Examples of verification

Verifying your HACCP plan

Scope: The HACCP plan must identify procedures used to verify compliance with the HACCP Plan. (Refer to HACCP guideline for more information).

Verification activities: In addition to regular review of monitoring records, the HACCP Plan should be reviewed at least annually or when there are changes to product, process, premise or procedure. Including a review of:

- Product Descriptions
- Flow Diagrams
- Hazard Analysis – including a review of current industry information for new or emerging potential hazards
- HACCP Table/s
- Verification
- Validation (“re-validation”)
- Monitoring procedures and records

The effectiveness of the HACCP Plan will also be verified through Product Testing.

Verifying compliance with importing country requirements specified in the AA.

Scope: Where compliance with the *Export Control (Fish & Fish Products) Orders 2005* will not meet importing country requirements, or where an application is made to vary the requirement of the *Export Control (Fish & Fish Products) Orders 2005* to meet specific importing country requirements - then the specific importing country requirements and the controls put in place to ensure compliance need to be documented in the Approved Arrangement and verified.

Verification activities: Should include:

- Review of importing country requirements
- Review of procedures that ensure compliance with importing country requirements
- Updating of documents detailing importing country requirements, and,
- Independent sampling and testing of product to verify that it meets applicable requirements for microbiological and chemical standards

Verifying Schedule 3 – Structural Requirements

Scope: Verify that structural requirements including the premise, surrounds, facilities, equipment, and essential services meet the applicable requirements of Schedule 3

Verification activities: A comprehensive maintenance program that includes a periodic review (internal audit) of the establishment as well as a maintenance schedule for both short-term and longer-term maintenance objectives.

Example: A Registered Vessel may conduct an inspection of the vessel prior to leaving port each trip to ensure that everything is in good repair and working properly and a comprehensive structural inspection prior to annual re-fit.

Inspections should be conducted using checklists referencing the requirements of Schedule 3 to ensure compliance and all results and details of any repairs or alterations documented.

Verifying Schedule 4 – Operational Hygiene (GMP)

Scope: Verify hygiene controls for premises and equipment, processing, and personal hygiene and health requirements.

Verification activities: Documented procedures must be in place so that both the occupier and AQIS can audit compliance with this Schedule. Verification activities should include a review of records kept in line with these documented procedures and a review of compliance with procedures.

In areas such as cleaning additional verification may include testing or swabbing to verify that cleaning procedures are effective.

Example:

Cleaning programs should be documented in the Approved Arrangement. Records should be maintained to indicate when the cleaning took place, and by whom. A selection of these records could be verified regularly to ensure that the cleaning program is occurring in accordance with the documented cleaning procedure.

The cleaning program itself should also be reviewed periodically to ensure that it is current (Are we still using the same chemicals?) and effective

Verifying Schedule 5 – Preparation and Transport

Scope: Verify procedures for (where applicable) harvesting and sourcing fish; depuration and wet storage of shellfish; chilling; freezing and other processes; packaging; storage, handling and loading; and transport of fish and fish products.

Verification activities: All monitoring records associated with product handling procedures should be regularly reviewed to ensure procedures are being followed and documented (e.g. Product receipt records, Dispatch records)

Calibration will be necessary for some processing equipment (e.g. freezers and chiller gauges) as well as a review of records (eg. temperature records).

Other elements of Schedule 5 will require review of documented procedures (eg. sourcing from unregistered establishments such as catcher vessels), which may be verified through a document and record review.

Verifying Schedule 6 – Product Standards

Scope: Verifying that finished products, raw material and ingredients meets the applicable Product Standards including standards for:

- Contaminants and natural toxicants (eg. cadmium)
- Residues (eg. antibiotics)
- Food additives (eg. sodium metabisulphite or 'meta')
- Micro-organisms (eg. *E. coli*)

Verification activities: Scheduled sampling and testing of finished products and the testing of ingredients including water and ice.

The suitability of ingredients such as salt or sodium metabisulphite may also be verified through obtaining a manufacturer's declaration.

Verifying Schedule 7 – Trade Descriptions

Scope: Verify requirements for when a trade description must be applied, and what must be included in the trade description.

Verification activities: Copies of all trade descriptions should be included in your Approved Arrangement as well as the procedure for when a trade description is applied. This procedure may include a checklist for staff applying the trade description or a procedure for regular inspection of the trade descriptions applied to finished product.

Verification should be a review of records kept of applying the trade description, as well as a check of the trade descriptions, particularly when product formulations change.

Verifying Schedule 8 – Identification, tracing systems, integrity and transfer

Scope: Verify procedures for the identification, tracing, integrity and transfer of product including identity of fish and fish products, traceability, recall provisions, and transfer requirements.

Verification activities: Documented procedures should be maintained, and copies of transfer certificates etc. used should be included in the Approved Arrangement. A procedure review and either a record review or a “trial” of the procedures should be considered.

Example: Hopefully you will not be involved in a recall of your product, and therefore your procedure will never be used. However, you may wish to verify the effectiveness of the recall procedure by conducting a trial –conduct a pretend or mock-recall to verify the procedure.

More information

AQIS

Adelaide	08 8305 9741	Hobart	03 6233 2502
Brisbane	07 3246 8746	Launceston	03 6391 9313
Bundaberg	07 4152 2511	Melbourne	03 8318 6752
Cairns	07 4030 7831	Perth	08 9334 1572
Canberra	02 6272 4543	Sydney	02 8334 7488
Darwin	08 8999 2063	Townsville	07 4789 7802

www.aqis.gov.au/fish or email <mailto:fish@aqis.gov.au>

For a copy of the Export Control (Fish & Fish Products) Orders 2005 see www.aqis.gov.au/fish

Useful Websites

Australia

Fisheries Research and Development Corporation:

<http://www.frdc.com.au/research/index.htm>

International

Codex Alimentarius Commission – see CAC RCP1 General Principles in Food Hygiene, first published 1969, as amended in 2003

http://www.codexalimentarius.net/web/index_en.jsp

USA guideline for fish and fish products Hazards and Controls Guidance 3rd edition

<http://www.cfsan.fda.gov/~comm/haccp4x4.html>

Compendium of Fish and Fisheries Product Processes, Hazards and Controls

<http://seafood.ucdavis.edu/haccp/compendium/compend.htm>

University of California – David Campus (UC Davis) - Seafood Network Information Centre

<http://seafood.ucdavis.edu/>