

Summary of Actions for the Development of A Strategic Plan for Seafood Safety and Quality for The Marine Fisheries Advisory Council (MAFAC)

Delay Request

There has been significant progress in developing the strategic plan for Seafood Safety and Quality for MAFAC. However, the *ad hoc* group that is working on the plan has asked Chairman Billy for a delay until the next MAFAC meeting in the spring or summer of 2009. There are several compelling reasons why delaying the final document is desirable.

1. There will be a new administration and a new NOAA Administrator and possibly a new Assistant Administrator for Fisheries. Since political appointees establish the priorities for the agencies it is difficult to judge what priority will be given to seafood safety and quality programs.
2. The 2008 Farm Bill gave USDA Food Safety and Inspection Service (FSIS) regulatory control over catfish. It also specified that FSIS could gain regulatory control over all farm-raised fish and fishery products if petitioned by the aquaculture industry. It also provided for a parallel voluntary program to the Seafood Inspection Program (SIP) for catfish and potentially all farm-raised fish to be administered by the Agricultural Marketing Service (AMS) of USDA. Moreover, the Farm Bill did not eliminate any authority of the Food and Drug Administration (FDA) or SIP. This overlap in authority for catfish and potentially farm-raised fish will likely cause a great deal of uncertainty in the seafood safety and quality arena.
3. FDA will begin implementing its Food Protection Plan and a pilot of third party inspection of overseas aquacultured shrimp operations. Some of these provisions will likely succeed and may change how food safety regulatory oversight is conducted.
4. There will likely be more legislative activity on seafood safety and quality in the next Congress. The political makeup of the next Congress will likely change and possibly affect the success of legislation that could drastically change the regulatory landscape for seafood.
5. The Government is currently on a continuing resolution for funding as the various funding bills did not pass the current Congress. This may last through FY09 and if so, will limit the implementation of new priorities until a budget is passed.

All of these factors add to the uncertainty of seafood safety and quality and regulation. We believe that some of these possible outcomes will become clearer in 2009 and delaying the final document will be beneficial to MAFAC in making its recommendations to NOAA Fisheries Senior Management.

Vision Options

The group has developed three possible vision options for the strategic plan. They are as follows:

- Seafood is the safest and most desirable animal protein food source.
- Safe, consistent quality and accurately labeled seafood benefits public health.
- Safe, consistent quality, accurately labeled, and sustainable seafood benefits public health and the nation's ecosystems.

The group is leaning towards the second bullet above. However, we may attempt some rewording.

Goals and Objectives

Goal I. Consumer perception and understanding

Obtain optimal health benefits through increased seafood consumption.

Objectives:

The group has identified several objectives to support this goal including measures to increase per capita consumption of seafood to at least 12 ounces per week, establishing a public information and education program regarding seafood safety and quality, establishing an external seafood advisory panel to help set priorities on seafood health research and safety programs, establishing of an international clearinghouse for seafood and health information and developing tools for consumers to help them understand the risks and benefits of seafood consumption.

Goal II. NOAA's Policies, Priorities and Organization

NOAA issues new guidance to improve coordination of programs and research in support of an adequate seafood supply, and product quality, safety, and labeling:

Several objectives were identified: NOAA will take more of a leadership role in the development of seafood safety policy development; NOAA will take measures to ensure seafood is accurately labeled and meets safety requirements; NOAA will redirect Product Quality and Safety (PQ & S budget line item) and Saltonstall-Kennedy (SK) appropriations towards seafood safety and quality activities; NOAA will improve data management that affects seafood safety programs; NOAA will play a larger role in international standard setting bodies (e.g. Codex, OIE and ISO; SIP is the lead Government source for all seafood certification requirements e.g. public health, animal health, traceability, IUU fishing).

Goal III. NOAA's Science and Technology

NOAA establishes adequate research and analytical capacity to support programs that assure safe, consistent quality, and accurately labeled seafood:

These objectives were offered: NOAA will survey its science to identify both its current capacities and capabilities and those of other Federal agencies; NOAA will take steps to better coordinate internally and with other agencies on science and technology matters; NOAA will attain equivalence with other laboratories both domestic and international through ISO 17025 certification; provide science support to international standards setting entities e.g. Codex, ISO, ISSC; NOAA will conduct seafood contaminant surveillance e.g. pharmaceuticals, pathogens, biotoxins and environmental contaminants; NOAA will conduct research to help modernize methods of contaminant detection; NOAA will develop the capacity to provide scientific data to risk assessors and risk managers for emerging seafood safety hazards; NOAA will conduct seafood risk assessments.

Goal IV. Seafood Inspection and Certification

NOAA increases its inspection, certification and compliance verification capacity in response to consumer and industry needs, and international trade requirements:

The group identified twenty objectives for the Seafood Inspection Program. These objectives may be categorized as follows, (1) **increasing the capacity of the SIP** e.g. creation of a management database, rewriting the Regulations Governing Processed Fishery Products, enhanced training programs for inspectors and the industry, (2) **taking measures that promote cooperation and collaboration with state, Federal and international food safety organizations**, e.g. complete an updated MOU with FDA, Animal Plant Health Inspection Service (APHIS) and FSIS, (3) **providing programs that satisfy the needs of industry and the consumer**, e.g. creating a joint program with Fisheries Enforcement and FDA to address economic fraud issues, expanding auditing services, eco-labeling services (if necessary), new and modernized U.S. Standards for Grades of Fish and Fishery Products.