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Buidheann
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OFFICIAL CONTROLS OF WILD PECTINIDAE FOR BIOTOXINS

IMPLEMENTATION OF EC REGULATIONS 854/2004 AND 882/2004

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INVESTORS
IN PEOPLE

Part A

- (I) Risk assessment principles**
- (II) Sampling procedures**
 - Code of Practice sampling procedure application**
 - Sample collection protocol**
 - Sample submission form: Wild pectinidae biotoxin**
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1. GLOSSERY OF TERMS

Amnesic Shellfish Poisoning	ASP
Authorised Officer	AO
Centre for Environment Fisheries and Aquaculture Science	Cefas
Competent Authority	CA
Diarrhetic Shellfish poisoning	DSP
End Product Testing	EPT
European Union	EU
Food Standards Agency in Scotland	FSA
Hazard Analysis and Critical Control Points	HACCP
Local Authority	LA
Live Bivalve Mollusc	LBM
Mouse Bioassay	MBA
Official Control	OC
Official Feed and Food Controls	OFFC
Scottish Statutory Instrument	SSI
Paralytic Shellfish poisoning	PSP
Rapid Alert System for Feed and Food	RASFF
The Food Hygiene (Scotland) Regulations 2005	Hygiene Regs
Scottish Fish Hygiene Working Group	SFHWG

OFFICIAL CONTROL SAMPLING OF WILD PECTINIDAE FOR BIOTOXINS

1. Executive Overview

This paper outlines the proposed new regime for Official Controls (OC) of wild scallops. These new procedures are required by EC Regulation 854/2004. FSA has central competency for functions under this Regulation. Enforcement of the regime for OC of wild pectinidae has been delegated to the Local Authority (LA).

This paper provides the background to the previous regime and the adoption of the new system, which will ensure compliance with community law.

In summary, the new requirements change the emphasis of controls from offshore monitoring to onshore verification checks required by Authorised Officers (AO) of the Local Authority (LA).

2. Sampling Programme

Previous

Prior to 1st January 2006 OC biotoxin samples were taken offshore with respect to wild pectinidae harvested out with classified shellfish production areas.

These samples were taken in accordance with a sampling protocol. On landing the samples were sent to Integrin Advanced Biosystems Ltd in Oban who arranged the logistics of sample taking and transport.

The sample results were sent directly to FSA to take any necessary action on receipt of these. Any areas deemed to be above legal action level were closed by emergency SSI under the Food and Environment Protection Act (FEPA). This prohibited fishing from areas where statutory levels had been breached. This system did not replace the need for industry to conduct its own end product testing. Approximately 30 – 35 FEPA orders were put in place per annum by the FSA.

Current

The previous arrangements were in place principally to satisfy the monitoring regime outlined in Commission Directive 91/492. This directive was revoked and replaced by EC Regulation 854/2004 on 1st January 2006. Therefore the above outlined requirements ended at this time.

Regulation 854/2004 indicates that the necessary OC samples should occur onshore. These samples should be taken at first auction, dispatch centre or processor.

The most important aspect of these regulations is that the emphasis for official controls is clearly placed at the point of placing on the market on land. Local Authorities (LA) will carry out checks at all processors/dispatch centres. The frequency of these checks will be appropriate to the individual business. As has always been the case, end product testing is the responsibility of the Food Business Operator (FBO).

Current intelligence suggests that the vast majority of scallops are fished to order and sent directly to the processor once landed. It is our view therefore that future resources are best targeted at the point of processing. However occasional OC may be necessary at first auction or dispatch centre. The Centre for Environment and Fisheries Aquaculture Sciences (Cefas), is contracted by FSA to arrange the logistics of sample taking and transport. Cefas will provide boxes and postage labels for sending flesh samples to the laboratory. Cefas will then undertake analysis of sample using methods specified by the EU Regulation.

Cefas inform the FSA of all results as they occur and will report as soon as possible whenever flesh samples exceed the regulatory levels. On receipt of results that exceed the maximum permitted level for Lipophilic toxins, ASP or PSP, FSAS will contact the relevant LA named contact officer by telephone as soon as possible.

Any Official Control (OC) sample taken by the LA which exceeds the statutory limits, will be treated as not complying with food safety requirements and will be dealt with accordingly. This may mean that the batch is destroyed. Similarly any industry sample which breaches the statutory limits will be considered as not complying with food safety requirements.

3. Legal Requirements and Competencies

3.1 Regulations

The new legal requirements are outlined in Chapter III of Annex II to Regulation 854 detailing Official Controls on wild pectinidae harvested out with classified production areas.

Such OC are to verify compliance with the health standards (including biotoxin levels) and other requirements of food businesses outlined in Regulation 853/2004 (Chapter IX of Section VII of Annex III). These OC checks are therefore verification checks on food businesses.

A food business is defined in Regulation 178/2002 as any undertaking carrying out any activities related to any stage of production, processing and distribution of food. The controls are therefore required to be applied at all stages of marketing.

The Food Hygiene (Scotland) Regulations 2006 allocate the national enforcement provisions for these EC Regulations and identify the LA as the Competent Authority (CA) for the execution and enforcement of these specific provisions.

The legal marketing standards in relation to biotoxins contained in Regulation EC 853/2004, Section VII, Chapter V 2 indicates that the Live Bivalve Molluscs (LBM) must not contain marine biotoxins in total quantities (measured in the whole body or any part edible separately) that exceed the statutory limits of:

PSP toxins: 800 µg [STX eq.]/kg shellfish

ASP toxins: 20 mg/kg shellfish

Okadaic acid (OA), dinophysistoxins and pectenotoxins together: 160 µg [OA eq.]/kg shellfish

Yessotoxins (YTX): 1 mg [YTX eq.]/kg shellfish

Azaspiracids (AZA): 160 µg [AZA eq.]/kg shellfish

It is our interpretation therefore that the product may be sold whole in the shell or shucked to provide adductor (white flesh) and Gonad (orange flesh) parts of the scallop or adductor part only, so long as the legal standards apply at the point of commercial marketing.

3.2 Documentation check

The range of OC checks will include the need to check documentation relating to sampling and verification. Details of the checks required in this area are outlined in the attached guidance.

4. Action in the event of a failed sample

If a sample fails the OC check then the requirements of Regulation 27 of The Food Hygiene (Scotland) Regulations 2006 Hygiene Regs apply. Where product is non compliant it must be disposed of accordingly. The General Food Law provisions of Article 19 require all food businesses to withdraw from the market products that do not comply with food safety requirements, therefore where there is evidence that products are not compliant they must be withdrawn.

Where appropriate the issuing of a Food Alert, and RASSF (Rapid Alert System Food and Feed) will be undertaken by the FSA in collaboration with the LA and the Food Business.

5. Risk assessment of Official Controls / Assistance to LA

As aforementioned the new requirements in effect move the emphasis of the point of control onshore and in so doing reinforce the need for OC verification checking already contained within current legislation. The Agency therefore expects that LAs, where shellfish are already marketed or processed, will have risk based verification checks in place. This would be in line with the current requirements for inspection at the point of first landing, auction and dispatch centre and processing establishments.

Nevertheless, the FSA anticipates that for some LAs additional OCs, particularly verification samples, may be required to supplement current activity. In light of this the FSA intends to support Scottish LA's by funding costs of:

- Sample equipment for the gathering of and transportation of the OC samples to the laboratory.
- The laboratory analysis of the samples for all three biotoxins.
- The administration, handling and reporting of results.

In general terms LAs should follow guidance on Inspection and sampling detailed within the enforcement code and associated good practice guidance. Samples should be taken from processors during normal inspection duties whose visit frequency should be determined by risk. However since specific frequencies of sampling have not been defined in legislation the minimum sampling frequencies are suggested in Part A (I) of the

attached guidance document. These should be complimentary to the general direction given within the Code.

6. Communication and Notification Arrangements for OC Results

6.1 Communication of sample results

All sample results will be made available to FSA by the laboratory completing the analysis. These will be immediately made available to the LA who in turn may make these results available to the business where the sample was taken.

6.2 Wider reporting

Every Tuesday the FSA will as usual report all OC biotoxin sample results. The summary report will be provided to all interested parties and published on the website.

These reporting procedures remain unchanged from those currently in place.

7. Scope of Work

In Scotland we have approximately **67** known approved processors handling King scallops. There are however a number of other establishments whose approval is not specific enough to evaluate their business extent.

The FSA has taken care to ensure that those processors listed are involved in the marketing of live King scallops and in King scallop fishery products, although this may be on a seasonal basis. This list should not be taken as definitive since businesses may change their scope.

PRACTICAL ENFORCEMENT GUIDANCE ON OFFICIAL CONTROL CHECKS

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PART A

(I) General Risk Assessment Principles

In 2003/04 FSA conducted a risk assessment on all offshore monitoring data relating to ASP in King scallops. This provided a general risk assessment of all offshore areas where adequate data was available. However, this assessment was unable to provide specific predictions for individual areas. The assessment covered ASP toxin only since it was considered to be the most probable toxin to affect this species in the offshore areas.

In general the study reached the conclusion that scallops in Scotland generally show a consistent pattern of approximately seven months of domoic acid (which causes ASP) uptake (May to November) followed by approximately five months of domoic acid release (December to April). This pattern is observed throughout Scotland and is also observed in other species.

Although PSP and DSP were not included in our risk assessment of toxicity in offshore King scallops, historical monitoring data relating to Scottish waters has suggested seasonality in the detection of these toxin groups in shellfish. In terms of Paralytic Shellfish poisoning (PSP), the causative toxins have been detected throughout the year, although peaks generally occur from March to September.

For Diarrhetic Shellfish Poisoning (DSP), and other lipophilic toxins, toxin levels tend to rise from March and start to tail off by November.

Using the above data, it may therefore be possible to allocate an intrinsic risk to an area at a particular time.

Previous research into the shucking of King scallops indicated that the main critical control point in the shucking process is the adequate removal of the hepatopancreas, mantle and gills. This process must take place within an approved establishment. Research has indicated that the removal of these tissues will remove the majority of ASP biotoxins from the animal.

It is important to note that the effectiveness of shucking for removing PSP and DSP toxins has not been scientifically demonstrated, so it cannot be assumed that effective shucking practice alone will ensure the removal of all of the biotoxin that may be present.

- Evaluation of this process therefore, coupled with the general assessment of your confidence in the processors' own checks or EPT, (to check that the product does not exceed the statutory limits for PSP, ASP and DSP), should allow a risk assessment to be determined for each processing establishment and the level of OC checks can be applied accordingly. For example a processor who conducts satisfactory EPT on product that is adequately shucked in conjunction with a full Hazard Analysis and Critical Control Points (HACCP) plan may require little ASP OC sampling.
- A processor with little EPT and who is handling whole product or inadequately shucked product will require the most frequent OC sampling.

It is known that additionally the quality of processor training, the actual quality of the shucking process, the HACCP system and end product testing as well as the environmental and biological factors affecting the biotoxin accumulation in the scallops are all important to the safety of the final product.

Decisions on batch size and sample frequency for EPTs are the responsibility of individual food businesses and will need to be determined on a case by case basis using risk assessment criteria. For example, EPT plans should take into account the risks associated with a particular time of year, the area the product has been gathered from and the nature of the product to be offered for sale (i.e. shucked, adductor only, whole).

The table below provides a suggestion as to how sampling might be scheduled within current arrangements promoting verification sampling during primary and secondary inspections and requiring follow up action where non compliance is identified during initial verification checks.

	Shucking Adequacy	EPT adequacy	HACCP adequacy	OC sampling frequency
1	Good evidence of shucking being carried out adequately by trained processors	Frequency of testing demonstrated as compliant with risk assessment carried out in accordance with business HACCP procedures with documentary evidence to this effect. Full traceability systems in place. EPT results can be shown.	Formally written HACCP. Evidence of its adequacy and compliance within the business. Training records complete. Full biotoxin risk assessment in relation to product in evidence. Evidence of action plan in event of a failed sample.	Every scheduled visit (minimum 2 times per year)
2	Shucking standards variable, training for processors not complete or comprehensive	Sporadic EPT. Little evidence that frequency of testing is compliant with risk assessment carried out in accordance with business HACCP procedures. Little documentary evidence of risk assessment to inform EPT. Knowledge of risk assessment procedures inadequate. Traceability ill defined.	General standard HACCP plan in evidence. No evidence of biotoxin issue being adequately addressed within the plan. Little evidence of action plan for use in the event of a failed sample.	Revisit and resample within 1 month until such times as standards in 1 above are reached
3	Shucking standards poor or inadequate, no specifically trained processors involved	No evidence of EPT, risk assessment or adequate knowledge of these.	HACCP plan, incomplete or inadequate. No real appreciation of biotoxin issues. No training records for staff.	Every 1 –2 weeks until such times that either 2 or 1 are reached in which case the relevant frequency applies.

In addition to the above frequencies, which are based on shucked products from approved establishments, it is also strongly advised that any whole product is sampled, at whatever point these are found to be entering the market. Officers are advised that while sampling it is most useful to gather their samples directly from the processing line if possible, i.e. post washing and soaking stage or at the storage stage thereafter. Some premises may have product packed fresh or frozen and again it is permitted to gather this if the processing has already ended for the day when you visit. It is however most desirable to visit during the processing stage wherever possible since this will allow better assessment of the processors' shucking practice.

Again please bear in mind that the efficiency of shucking as a critical point has been assessed only from the viewpoint of minimising the risk of **ASP toxin**. No scientific work has validated this approach for similar removal of PSP or DSP toxins. Processors must conduct regular EPT in order to ensure that products do not exceed the statutory limits for PSP, ASP and DSP.

(II) Sampling procedures

(a) Code of Practice (CoP) sampling procedure application

OC samples must be taken in accordance with the guidelines in (II) b and (II) c and following the principles of sample-taking set down in The Food Safety Act 1990 Code of Practice, Section 6, on the sampling of foodstuffs for analysis.

If samples are taken simply for background surveillance purposes the sampling provisions of the Code of practice do not apply in full.

(b) Sample collection protocol

The following protocol indicates how the OC sample should be gathered and details the method, amount and equipment required to fulfill this. The sample submission form must accompany the samples to the laboratory.

All samples once taken should be posted to the address shown on the protocol. The relevant equipment to facilitate the taking of these samples i.e. cool box, ice packs, bags and labels will be provided to the LA on request from the laboratory. If the LA prefers, its own uniquely numbered security tags may be used to secure the sample bags.

ALGAL TOXIN MONITORING AND SURVEILLANCE PROGRAMME SHELLFISH SAMPLE COLLECTION PROTOCOL

- 1 Shellfish samples should be collected from identified sites at the stated frequency.
- 2 The sites and collection frequency may change depending upon the prevalence of algal toxins but any changes will be notified beforehand.
- 3 Ideally, shellfish samples should be collected on Monday or Tuesday of each week and posted to Cefas. Flexibility for collection throughout the week is in place, however. Should you be unable to sample on these days, we request you contact the Cefas programme co-ordinator (Ben Stubbs) to discuss (Tel: 01305 206713 Email: ben.stubbs@cefas.co.uk)
- 4 Shellfish sample size should be such that at least 200g of meat can be provided for the ASP, DSP and PSP assays. This is usually achieved by the following minimum numbers of suitable commercial size animals: (see sample submission form below)
- 5 Shellfish must be placed in the polythene bags provided and the bags tied with an air space above the shellfish to allow the animals to breathe. The sample submission form should be completed with the date of collection, site identification number and production area, name of collector, and other relevant data eg OS grid reference, state of tide, water temperature, weather conditions and the number of sample collection boxes remaining.
- 6 The bagged sample and form should then be placed in the container provided along with frozen cool packs and foam. The box must be sealed with adhesive tape and a prepaid postage label attached before posting to Cefas, Weymouth Laboratory, Barrack Road, The Nothe, Weymouth, Dorset, DT4 8UB (for purposes of Royal Mail Special Delivery, we have been assigned the postcode DT4 8BF).

Sample Submission Form: Wild Pectinidae Biotoxin Monitoring

Please ensure that samples are accompanied by this sheet
and that all sections have been completed - thank you.

Date of Collection from Processors:

Name of LFA Officer:
Contact Telephone Number:

Name and Address of Premises:

Premises Approval No.:

Origin of Sample ie sea box no./area:

Sample details (please tick box):

		Minimum requirement:
Whole King Scallop (in shell)	<input style="width: 50px; height: 20px;" type="text"/>	<input style="width: 50px; height: 20px; text-align: center; border: 1px solid black;" type="text" value="30"/>
Shucked King Scallop	<input style="width: 50px; height: 20px;" type="text"/>	<input style="width: 50px; height: 20px; text-align: center; border: 1px solid black;" type="text" value="30"/>
White Meat Only King Scallop	<input style="width: 50px; height: 20px;" type="text"/>	<input style="width: 50px; height: 20px; text-align: center; border: 1px solid black;" type="text" value="30"/>
Whole Queen Scallop (in shell)	<input style="width: 50px; height: 20px;" type="text"/>	<input style="width: 50px; height: 20px; text-align: center; border: 1px solid black;" type="text" value="50"/>
Shucked Queen Scallop (whole or adductor/gonad)	<input style="width: 50px; height: 20px;" type="text"/>	<input style="width: 50px; height: 20px; text-align: center; border: 1px solid black;" type="text" value="50"/>
Adductor (white) meat of Queen Scallop	<input style="width: 50px; height: 20px;" type="text"/>	<input style="width: 50px; height: 20px; text-align: center; border: 1px solid black;" type="text" value="50"/>

Other Information eg
Dates of Harvesting:
Date of Landing of Catch:
Where Landed:

Number of sample boxes remaining: (please circle)	1	2	3	4	5+
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To be completed by Cefas

Date of arrival: Time of arrival:

Cefas Sample ID:

PLEASE ENSURE THAT COOL-PACKS ARE FROZEN BEFORE PUTTING IN SAMPLE BOX

(III) Documentary OC checks

Chapter VII of EC Regulation 2004/853 indicates that a business should only accept LBM if they are accompanied by a Registration document. A registration document should accompany every batch of Live Bivalve Molluscs (LBM) between establishments up to and including the arrival at dispatch or processor.

This document must include:

- Gatherer identification and address
- Date of harvesting
- Location of production area/offshore area described in detail or by a code number e.g. in Scotland the box number for offshore areas
- If applicable the health status of the production area (only relevant if the area is classified)
- Shellfish species and batch
- Destination of the batch
- The document must be easy to read and must not be able to be altered
- The document should be date stamped on receipt at the processor or there should be a record of the date of the receipt in another manner
- The food business must keep the document for at least 12 months
- if all establishments are in the same ownership and within the same LA area, registration documents may not be necessary if the LA permits this and there are other means of full traceability.

The product cannot be placed on the market for consumption other than via a fish auction, dispatch centre or processing establishment. The business must inform the Competent Authority (in this case the LA) that they are handling pectinidae.

(IV) Business End Product Testing (EPT) requirements

All food businesses must comply with Chapter V of 853, which requires the business to ensure that products comply with certain health standards. It is anticipated that food businesses will require undertaking their own EPT to ensure compliance with this requirement.

This EPT must include:

- Organoleptic characteristics of freshness, viability, free from dirt, excess intravalvular fluid with adequate response to percussion.

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- Biotoxins as described in above in Part 3.1

PART B – sample registration document

LIVE SHELLFISH REGISTRATION DOCUMENT

Registration Document Number: _____ **Date of Issue:** 28/12/10 **Date of Expiry:** _____

Issued by: _____

----- This document is valid only if RED ink stamp and IMPRINT of Council logo are given below -----

Name of harvester/gatherer: _____

Address of harvester/gatherer: _____

Telephone number of harvester/gatherer: _____

Signature of harvester/gatherer: _____

Date of Harvesting/gathering: _____

Location of production area described in as precise detail as practicable: _____

Class of production area (A, B or C):
(not required for scallops harvested outside classified areas)

Local Authority where shellfish landed:
The Highland Council

Name of shellfish species being moved:

Common Name:

Scientific Name:

Quantity of shellfish being moved

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Place of destination for relaying, wrapping, purification or processing: _____

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Where applicable, Approval Number:

If sent from a relaying area please complete the following:

Relaying area:

Duration of relaying:

If sent from a purification centre please complete the following:

Address of Purification Centre:

Duration of purification:

Date batch entered Purification Centre: Date batch left Purification Centre:

Place of Receipt:

Signature of Recipient: Date of Receipt:

<u>Local Authority Stamp</u>	<u>Local Authority Imprint (embossed logo)</u>
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Guidance on Live Shellfish Registration Documents

The shellfish registration document system's main aim is to safeguard public health by maintaining a level of traceability within the chain of harvesting, movement, relaying (where appropriate), purification, processing or heat treatment to the final consumer. This allows for recall of product if a food safety incident occurs.

The law

A shellfish registration document must accompany each batch of live shellfish at all times during transport from the area it was caught or harvested to a dispatch centre, purification centre, relaying area, or processing plant.

The definition of live shellfish includes:

- live bivalve molluscs (e.g. razors, mussels, cockles, scallops, clams, oysters)
- live marine gastropods (e.g. periwinkles, whelks)
- live echinoderms (e.g. sea urchins, sea cucumbers)
- live tunicates (e.g. sea squirts)

The law applies regardless of the fishing method e.g. shellfish registration documents are needed for hand-dived scallops or farmed scallops or dredged scallops.

The definition does not include lobsters, prawns or crabs and they do not require shellfish registration documents.

Responsibility of harvester/gatherer

- The harvester/gatherer shall ensure the completed registration document accompanies each batch at all times
- The harvester/gatherer must complete all relevant parts so that they are easy to read and cannot be altered.
- The harvester/gatherer shall keep a copy of each registration document for at least 12 months.

Responsibility of operators receiving batches of live shellfish

- Operators receiving a batch of live shellfish shall put the date it was received on the shellfish registration document.
- Operators are required to retain registration documents for at least 12 months.
- If a batch in respect of which a registration document has been issued is split for any reason, the person having control of the original batch at the time of splitting shall ensure that the information accompanying the original batch accompanies each sub-batch in the same form as the registration document together with the full name and address of the person splitting the batch.

Exemptions

- The Local Authority can grant a Transport Authorisation to permit operators of dispatch centres, purification centres, relaying areas or processing establishments to move shellfish between harvest areas they operate and their establishments. If granted, the operator will not require shellfish registration documents for the specified movements.
- Limited exemptions are available for fishermen supplying small quantities directly to local consumers, local shops or local restaurants. Please contact your local environmental health office if you wish to discuss this exemption.

Please note:

The above guidance on legal requirements should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power. It is ultimately the responsibility of individual businesses to ensure their compliance with the law.

PART C

ESTABLISHMENTS CURRENTLY HANDLING/PROCESSING WILD PECTINIDAE*

*Please see <http://www.food.gov.uk/multimedia/spreadsheets/fishlbmscot.xls> for up to date details on all approved establishments

Authority	Approval Number	Name of Establishment	Type of Business	Trading Activity	Approved Under Part II	Approved Under Part III	Handles
Aberdeen City	AA 072	TDG UK Storage	Cold Store (Plate Freezes Fish)	Coldstore		Approved Fishery Products Establishment	Frozen Product
Aberdeenshire	BB 152 FM	Fraserburgh Fish Market	Fish market	Fish Wholesale		Registered Auction or Wholesale Market	Fresh Product
Aberdeenshire	BB 155 FM	Peterhead Fish Market	Fish market	Wholesale Fish Sales		Registered Auction or Wholesale Market	Fresh Product
Aberdeenshire	BB 154 FM	Whitehills Fish Market	Fish market - Trust Owned	Landing, Auction sale and dispatch of fishery products		Registered Auction or Wholesale Market	Fresh Product
Aberdeenshire	BB 009 FE	Fraserburgh Seafoods	Fish Processing	Primary processing, packing	Dispatch	Approved Fishery Products Establishment	Fresh Product/Frozen Product
Aberdeenshire	BB 027 FE	Whitelink Seafoods	Fish Processing	Primary processing (fish & shellfish), packing, chilling	Dispatch	Approved Fishery Products Establishment	Fresh Product
Aberdeenshire	BB 102 FE	Deveron Shellfish,	Fish Processing	Shellfish storage and primary processing	Dispatch	Approved Fishery Products Establishment	Fresh Product

Aberdeenshire	BB 093 FE	Macduff Shellfish (Scotland) Ltd	Fish processing	Primary processing, packing, chilling, freezing, cooking, preservation	Dispatch	Approved Fishery Products Establishment	Fresh Product/Frozen Product
Aberdeenshire	KB 004 FE	Gourline	Fish Processing	Primary processing, smoking, packing, chilling		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Aberdeenshire	BB 086 FE	Sco-bere Seafoods	Fish processing	Primary processing, preservation, packing, chilling, dispatch	Dispatch	Approved Fishery Products Establishment	Fresh Product/Frozen Product
Aberdeenshire	BB 093 FE	Macduff Shellfish (Scotland) Ltd	Shellfish processing	Primary processing, packing, chilling, freezing, cooking, preservation	Dispatch	Approved Fishery Products Establishment	Fresh Product/Frozen Product
Angus	AB 012 FE	M & M Spink	Fishmonger	Manufacturer/whole saling and retailing of fish products		Approved Fishery Products Establishment	Fresh Product
Angus	AB 015 FE	A Spink & Son	Fishmonger	Wholesale/retail of fishery products		Approved Fishery Products Establishment	Fresh Product
Argyll and Bute	AD 014 D	O-Fish Shell Ltd	Despatch	Dispatch of winkles	Dispatch		Fresh Product
Argyll and Bute	AD 066 FE	Oban Port Users Association	Dispatch centre	Dispatch of shellfish	Dispatch		Fresh Product
Argyll and Bute	AD 071 D	Tarbert Shellfish Co Ltd	Dispatch of fresh shellfish	Distributor	Dispatch		Fresh Product
Argyll and Bute	AD 047 FE	A & H MacMillan	Dispatch of smoked fish	Processing of scallops and		Approved Fishery Products	Fresh Product

				smoking of fish		Establishment	
Argyll and Bute	AD 037 FE	Lochfyne Seafarms	Dispatch/Processing of scallops	Processing of scallops		Approved Fishery Products Establishment	Fresh Product
Argyll and Bute	AD 050 FE	Lochfyne Oyster Ltd	Fishery producer/Smokery	Manufacturer/Producer		Approved Fishery Products Establishment	Fresh Product
Argyll and Bute	AD 094 FE	P & E McConnachie	Handling/Packaging of Live Fishery Products	Live fishery product wholesalers and transporters		Approved Fishery Products Establishment	Fresh Product
Argyll and Bute	AD 004 D	Muckairn Mussels	Harvesting of oysters	Producer	Dispatch		Fresh Product
Argyll and Bute	AD 095 DFE	N & H Prentice Seafoods	Holding and dispatch of live Fishery Products & Shellfish	Holding Packing & dispatch of live fishery products and shellfish	Dispatch	Approved Fishery Products Establishment	Fresh Product
Argyll and Bute	AD 096 D	Tarbert Fish Market	Landing, sorting and dispatch of shellfish	Landing, sorting, Packing & dispatch of live Shellfish	Dispatch		
Argyll and Bute	AD 093 FE	Islay Crab Exports and Scallop Factory	Processing of scallops	Processing Scallops	Dispatch	Approved Fishery Products Establishment	Fresh Product
Argyll and Bute	AD 090 FE	Flying Fish	Shellfish/Fish	Prawns, live scallops		Approved Fishery Products Establishment	Fresh Product
Argyll and Bute	AD 047 FE	MacMillan Food	Wholesalers, Retailers, Caterers, Farmer's markets, Mail order	Brining, Curing, Hot & Cold smoking, Slicing, Packing		Approved Fishery Products Establishment	Fresh Product Frozen Product

City of Edinburgh	ED 0036	Waltons Fishmonger	Fish Processor	Whole sale fish Processing		Approved Fishery Products Establishment	Fresh Product
Comhairle Nan Eilean Siar	WA 007 FE	Stornoway Shellfish	Fishery establishment	Processing/Packing		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Comhairle Nan Eilean Siar	WA 001 FE	Islander Shellfish	Processor	Processor		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Comhairle Nan Eilean Siar	WA 034 FED	Kallin Shellfish	Processor	Processor	Dispatch	Approved Fishery Products Establishment	Fresh Product
Comhairle Nan Eilean Siar	WA 045 FE	Mr Alasdair Fraser	Stornoway Fish Smokers	Fish Processor	Fish Processing	Approved Fishery Products Establishment	Fresh Product
Dumfries and Galloway	SB 002	West Coast Sea Products Ltd	Shellfish processor	Shellfish Processor		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Dumfries and Galloway	WD 026	Dee Fish	Shellfish processor	Shellfish processor, smoked salmon		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Dumfries and Galloway	WD 101 FE	Galloway Seafoods Ltd	Shellfish processor	Breaded Scampi		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Dumfries and Galloway	WD 023	Marrbury Smokehouse	Smokehouse	Smoked products		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Dundee City	DB 017	McLeish Bros. Ltd	Manufacturing Unit	Supply to own retail outlets		Approved Fishery Products Establishment	Fresh Product/Frozen Product
East Lothian	EB 001	Barry Buglass & Son	Dispatch centre	Marine Gastropods	Dispatch		Fresh Product

Fife	KC 204 FP	Iona Shell	Shellfish processor	Scallop processing		Approved Fishery Products Establishment	Fresh Product
Glasgow City	GA 001 FM	Glasgow Wholesale Fish Market	Wholesale fish market	Wholesaling of fishery products and live bivalve molluscs		Approved Fishery Products Establishment	Fresh Product
Highland	SF 032 FED	Keltic Seafare	Fish processing	Wholesale shellfish/prawns/scallops	Dispatch	Approved Fishery Products Establishment	Fresh Product
Highland	SF 002 D	Highland Aquaculture Ltd	Floating dispatch centre	Scallops	Dispatch		Fresh Product
Highland	SF 005 D	Skye Divers Scallops	Floating dispatch centre	Scallops	Dispatch		Fresh Product
Highland	SF 007 D	Oakes Marine	Floating dispatch centre	Scallops	Dispatch		Fresh Product
Highland	SF 008 D	Omega Scallops	Floating dispatch centre	Scallops	Dispatch		Fresh Product
Highland	LA 003 FE	Crannog Concept Ltd	Production/Process/Retail /Shellfish/Prawns/Mussels/Oysters/Hot/Cold smoked salmon	Production/Process/Retail	Dispatch	Approved Fishery Products Establishment	Fresh Product

Highland	SF 048 FED	Alistair Bruce Shellfish	Shellfish dispatch/Shellfucking unit	Live shellfish wholesale	Dispatch	Approved Fishery Products Establishment	Fresh Product
Highland	LA 002 FED	Lochleven Shellfish	Shellfish packing/Dispatch	Shellfish packing/Dispatch	Dispatch		Fresh Product
Highland	RB 004 FE	Hebridean Seafare	Shellfish processing	Wholesale		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Highland		Ocean Traders Ltd	Small Scale Fish Filleting and Shellfish Shucking			Approved Fishery Products Establishment	Fresh Products/Frozen Products
Highland	SF 037 FE	Letterfinley Specialist Foods	Smoking/Processing of fish/Shellfish	Specialist food supplier	Dispatch	Approved Fishery Products Establishment	Fresh Product
Highland	CA 007 FE	D Steven & Son	Warehouse	Transport undertaking		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Inverclyde	IA 002	S & A Seafoods Ltd	Wholesale/distribution Fishmerchant	Wholesale/distribution		Approved Fishery Products Establishment	Frozen Product
Moray	MC 002 FE	Moray Seafoods Ltd	Fish processing	Primary white fish, prawns and scallop processing, cooked and peeled prawns		Approved Fishery Products Establishment	Fresh Product/Frozen Product
North Ayrshire	CG 001 FE	Fencebay Fisheries	Fishery product establishment	Retail, Wholesale and Mail Order of fish, shellfish and fishery products		Approved Fishery Products Establishment	Fresh Product/Frozen Product
North Lanarkshire	MD 021 FED	Frigecosse Ltd	Chilled storage warehouse	Chilled storage and distribution of fresh fish and shellfish species	Dispatch		Fresh Product

Orkney Islands	OA 010 FED	Orkney Seafayre	Dispatch centre and purification	Fish processing	Dispatch		N/A
Orkney Islands	OA 003 FED	Orkney Fishermans Society Ltd	Fish processing	Fish processing	Dispatch	Approved Fishery Products Establishment	Fresh Product/Frozen Product
Orkney Islands	OA 025 FE	Orkney Seafresh	OFDS	Fish Processing	Fish Processing	Approved Fishery Products Establishment	Fresh Product
Perth and Kinross	PA 025 FE	Kerachers	Fish processor smoking fish and handling shellfish	Sale of smoked fish and shellfish to other retailers		Approved Fishery Products Establishment	Fresh Product/Frozen Product
Shetland Islands	SA 057	Hunters Fish			Dispatch	Approved Fishery Products Establishment	Fresh Product
Shetland Islands	SA 050D	MV 'Gratitude' LK 762	Dispatch Centre	Wholesale	Dispatch		Fresh Product
Shetland Islands	SA 042 FE	Blydoit Fish Limited	Fish Processor	White Fish Processor		Approved Fishery Products Establishment	Fresh Product
South Ayrshire	KD 005 FE	J Pieroni & Sons	Fish processor	Fish Processor	Dispatch	Approved Fishery Products Establishment	Fresh Product
South Ayrshire	KD 006 D	J Pieroni & Sons	Fish processor	Fish Processor	Dispatch	Approved Fishery Products Establishment	Fresh Product
South Ayrshire	KD 009 D	Scotprime Seafoods Ltd	Processor	Fish Processor	Dispatch	Approved Fishery Products Establishment	Fresh Product
South Ayrshire	KD 008 FE	Scotprime	Processor/pa	Fish Processor	Dispatch	Approved Fishery	Fresh Product

		Seafoods Ltd	cking			Products Establishment	
South Lanarkshire	HA 001	Dawnfresh Seafood Limited	Manufacturer /Processor	Manufacturer/Processor		Approved Fishery Products Establishment	Fresh Product/Frozen Product

PART D

FREQUENTLY ASKED QUESTIONS

1. What EPT is it reasonable to expect from industry?

The frequency of EPT undertaken by industry is wholly determined by risk. There should be evidence therefore that the business has assessed the imminent risk for each of the three toxins at given periods of the year and for each area from which it accepts wild pectinidae.

The definition of batch also becomes important since the frequency determined by the business may then be applied to each batch. Again the definition of a batch will be business dependent.

A small batch will result in more EPT but then less destruction of product in the event of a failure of that result. A large batch may reduce the EPT but lead to more product destruction in the event of a sample failure. It may be the case that batch size definition will therefore vary to fit with the variable risk periods during the year.

2. What training is the FSA providing to industry and LA in relation to King scallop processing and hazard control?

The FSA is funding training to all processors of King scallops and their enforcing LA. The training will cover the application of the correct shucking procedure and the application of HACCP in their businesses in relation to biotoxin management in live bivalve molluscs and fishery products. LAs will be invited to attend these training sessions so they may then feel best placed to assess the application within their processing establishments. The training will be led by SEAFISH on behalf of the FSA.

Additionally posters for processing businesses on shucking technique are available. These are aimed for business managers and operators and they indicate how the processing should be applied to ensure correct removal of contaminated animal parts.

3. What advice does the FSA provide to industry regarding the frequency of EPT?

The FSA has indicated that industry must risk assess its business adequately and base its EPT upon this assessment.

The FSA is happy to provide all biotoxin historic data to industry to allow such assessments to be made and to offer general assistance in this.

When making an assessment as to whether the EPT frequency is adequate authorised officers should have regard to the criteria set down in Table in Part A.

4. How are industry expected to carry out their EPT ?

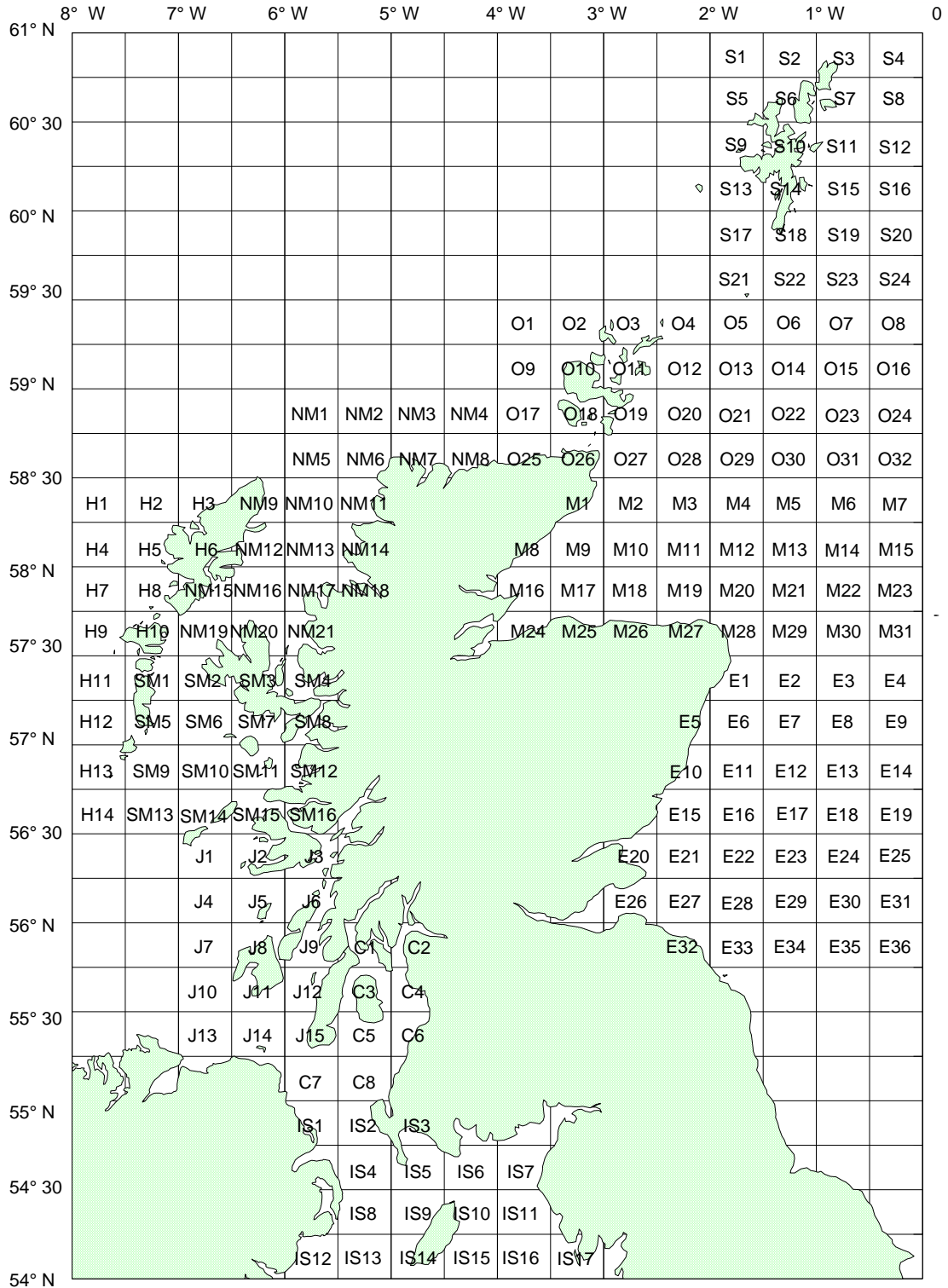
Information on EPT is available at the following link:

<http://www.food.gov.uk/scotland/safetyhygienescot/shellmonitorscot/endproducttestingshellfishtoxins/>

5 Who do I contact in the FSA to get more information?

See Part F where a list of officers, their work area and their contact details are provided.

PART E OFFSHORE MAP SHOWING 'BOXES'



PART F.
1. FSA SHELLFISH UNIT CONTACT LIST

Name	Areas of work	Contacts
Jenny Howie	Head of Shellfish Unit	☎ 01224 285 157 jennifer.howie@foodstandards.gsi.gov.uk
Caroline Thomson	Biotoxin <i>E. coli</i> management and classification Sanitary Surveys Sampling Officers	☎ 01224 288 378 caroline.thomson@foodstandards.gsi.gov.uk
Kasia Kazimierczak	NRL contract and support Scientific Advice Testing methods	☎ 01224 285 113 kasia.kazimierczak@foodstandards.gsi.gov.uk
Marjorie Kennie	Depuration Chemical contaminants Phytoplankton SHS2 database.	☎ 01224 285 111 marjorie.kennie@foodstandards.gsi.gov.uk

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Graham Ewen	SHS2 support Support to contract managers Scottish Government aquaculture database Classifications/appeals	☎ 01224 285 190 graham.ewen@foodstandards.gsi.gov.uk
Catherine Ferro	Results Support to contract managers	☎ 01224 288 360 catherine.ferro@foodstandards.gsi.gov.uk

2. FSA ENFORCEMENT BRANCH CONTACT LIST

Name	Areas of work	Contacts
Andy Morrison	Senior Environmental Health Specialist	☎ 01224 285 196 andrew.morrison@foodstandards.gsi.gov.uk
Neil Leitch	Incident Management and Enforcement Officer	☎ 01224 285194 neil.leitch@foodstandards.gsi.gov.uk
Ryan Bruce	Incident Advisor	☎ 01224 285138 ryan.bruce@foodstandards.gsi.gov.uk