



Industry Notice

February 15, 2008

TO: REGISTERED SHELLFISH PROCESSING ESTABLISHMENTS

SUBJECT: ENHANCED CSSP REQUIREMENTS: HUMAN WASTE CONTAINMENT ON BOARD SHELLFISH HARVESTING VESSELS

The Canadian Food Inspection Agency (CFIA), Fisheries and Oceans Canada (DFO) and Environment Canada, the partners in the Canadian Shellfish Sanitation Program (CSSP), are enhancing program requirements to better address the potential health risks associated with human waste disposal into waters where shellfish are harvested. The improved controls apply to shellfish harvesting vessels and will affect federally registered shellfish processors through their QMP implementation practices.

Discharge of human sewage from harvest vessels in or adjacent to shellfish harvest areas is not permitted under the CSSP. Therefore, harvest vessels operating at a distance which does not allow for timely access to on-shore washroom facilities will be required to have a designated human waste receptacle on board. Additionally, persons on board will be required to clean their hands appropriately after using a waste receptacle in order to prevent cross contamination of the shellfish. For reference, Annex 1 contains excerpts from the revised Chapters of the CSSP Manual of Operations.

Waste containment and appropriate sanitary practices are required in order to minimize the potential health risks associated with the consumption of shellfish contaminated by human wastes such as sewage. Federally registered facilities must consider whether the shellfish they process have been harvested and handled in accordance with the CSSP requirements. Facilities must enhance their QMP plan and implement appropriate controls to verify the presence of human waste receptacles on shellfish harvesting vessels. In doing this, facilities will address potential human waste contamination issues and provide reasonable assurance that incoming live shellfish meets Canadian regulatory requirements.

Where on-board sewage containment is not present, adequate justification as to why the vessel does not have an on-board receptacle must be provided. The facility shall consider, as appropriate, information regarding vessel distance from shore, vessel size/ type, length of trip, and harvest /operational conditions in order to assess whether the incoming product has been harvested in compliance with the CSSP requirements.

There are various options available to processors to achieve compliance, including but not limited to:

- Developing and maintaining a list of acceptable harvesters/growers that have met the CSSP requirements, and having a system in place to use this list during the receipt of incoming shellfish as part of your facility's HACCP Plan;

- Establishing Supplier Quality Assurance (SQA) agreements for incoming shellfish with harvesters/ growers that have met the CSSP requirements;
- Incorporating HACCP verification activities at the harvest site to ensure that harvesters /growers meet the CSSP requirements.

The design, implementation and effectiveness of these controls are the responsibility of each shellfish processing establishment. CFIA will conduct Compliance Verifications (CVs) to confirm the adequacy of such controls.

There will be a phasing-in period for incorporating these enhanced controls into a plant's QMP. While the CSSP encourages adjustments as soon as possible, compliance will be required by April 1st, 2008.

These efforts by shellfish growers, harvesters, and federally registered processing establishments will help maintain and even improve water quality in shellfish harvest areas, and will help maintain Canada's reputation as a source of safe, high-quality shellfish.

Further details regarding CSSP requirements can be found at:

<http://www.inspection.gc.ca/english/anima/fispo/imanman/cssppccsm/toctdme.shtml>

Any questions or comments regarding the above can be directed to your local CFIA Fish Inspection office.

Original signed by

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ANNEX 1

CANADIAN SHELLFISH SANITATION PROGRAM MANUAL OF OPERATIONS

CHAPTER 4 – HARVESTING AND HANDLING SHELLSTOCK

Each registered facility must consider, and where applicable, incorporate the following components in the development and implementation of their Quality Management Program (QMP).

4.3 Human Wastes

Measures must be in place to prevent contamination of shellfish by human wastes during shellfish harvesting.

- 4.3.1 Human wastes or sewage shall not be discharged from harvest vessels while in or adjacent to shellfish harvesting areas.
- 4.3.2 Vessels operating at a distance which does not allow for timely access to on-shore washroom facilities are expected to have a designated human waste receptacle on board. A receptacles could be portable toilet, a fixed toilet ¹ or other containment device as appropriate. Such devices must be made of impervious, cleanable materials and have a tight-fitting lid.
- a) Portable toilets or other designated human waste receptacles shall be used only for the purpose intended, and shall be so secured and located as to prevent contamination of the shellfish harvest area or any harvested shellfish on board by spillage or leakage.
 - b) The contents of toilets or other designated human waste receptacles shall be emptied only into an approved sewage disposal system, and portable toilets or other designated human waste receptacles shall be cleaned before being returned to the vessel. (Facilities used for cleaning food-processing equipment shall never be used for cleaning portable toilets or designated human waste receptacles).
- 4.3.3 All persons must clean their hands after using or cleaning the receptacles described above.

CHAPTER 7 – SHELLSTOCK SHIPPING AND LABELLING

7.1 Shellstock Identification, Harvesting and Handling

All shellstock shall originate from an approved source. It shall be harvested, handled and identified in accordance with the requirements of Chapter 4 of this manual.

¹Refer to Transport Canada's Regulations for the Prevention of Pollution from Ships and for Dangerous Chemicals, entered into force on May 3, 2007 under the *Canada Shipping Act*