

January 13<sup>th</sup>, 2025

Dear Valued Customer:

You have requested certain food safety information regarding Sysco's Specialty Meat Group (SSMG) Canadian and US Seafood Operations. All US SSMG seafood products are produced in establishments subject to the United States Department of Health and Human Services – Food and Drug Administration (FDA) regulatory authority and inspections, under applicable guidance, policies, laws and regulations. This includes but is not limited to the Federal Food, Drug and Cosmetic Act, Public Law 75-717, 52 Stat 1040, *Hazard Analysis and Critical Control Point (HACCP) system regulations and Import regulations for "Fish and Fisheries Product" promulgated by the FDA (21 C.F.R. Part 123.12) and applicable amendments to the Federal Food Drug and Cosmetic Act detailed in the 2011 Food Safety and Modernization Act*, Public Law 111-353, 124 Stat 3885. This includes all Recall, Sanitary Transportation and Supplier Verification requirements of that law. Further, Imported products at the US SSMG locations also comply with the Import requirements in 9 CFR 123.12 and the National Oceanographic and Atmospheric Administrations (NOAA) US Seafood Import Monitoring Program requirements, if applicable (15 CFR 902, 50 CFR 300 & 600). The Canadian Seafood Operations are produced in establishments subject to the Canadian Food Inspection Agency (CFIA) oversight and follow their governmental laws and regulations. All Canadian seafood facilities are licensed under the SFCR (Safe Food for Canadian Regulations – SOR-2018-108) as seafood processors and distributors and have a comprehensive PCP (Preventive Control Program) in place, which includes a HACCP program.

Seafood Products produced by US SSMG locations comply with the Code of Federal Regulations (CFR) Title 21, Part 123, "Fish and Fishery Products," commonly referred to as the Seafood HACCP regulations, established by the US Department of Health and Human Services, Food and Drug Administration (FDA) and the SFCR. More specifically, each US SSMG facility takes into account all FDA policies, directives, regulations and laws as well as HACCP guidance detailed in the FDA's Fish & Fisheries Products Hazards & Controls Guidance: fourth edition. This means all **US** SSMG facilities operate under functioning HACCP Plans with Critical Control Points (CCPs) developed upon scientifically documented Hazard Analyses and taking into account preventive measures against Bacteria Pathogens, Chemical Hazards, Intentional Adulteration, Natural Toxins, Parasites, Physical Hazards, Radiological Hazards and Scombrottoxins. The HACCP Plan CCPs are validated with scientific documentation and verified on an ongoing basis. Furthermore, SSMG HACCP Plan functionality is reviewed prior to product shipments and all SSMG HACCP Plans are reassessed via a scientific review of potential hazards on at least an annual basis, in the event of relevant new regulations or upon a system change.

All SSMG facilities operate under detailed corporate defined product Recall and Traceability Programs for raw materials, packaging materials, ingredients, finished products and box in and out products shipped and/or received from our facilities. Each facility has a detailed Recall Program, Recall Action Plan, a multi disciplined Recall Action Team and performs semiannual Mock Recalls to test program effectiveness. Furthermore, all SSMG facilities comply with appropriate expectations or requirements of 21 CFR 117.139 Recall plan regulations and SFCR – Division 5, 82-85 in Canada.

All SSMG facilities operate under a strict Supplier Approval Program for all seafood products which includes obtaining ongoing and verified letters of guarantee from raw material suppliers. This letter must assert that each supplier facility has functional HACCP Plans that are in compliance with 21 CFR 123 and SFCR. All supplier facilities of seafood products used for further processing must pass an annual second party food safety audit or provide an annual passing third party food safety audit summary (with the exception of those suppliers who have attained current Global Food Safety Initiative (GFSI) certification, who supply current certificates of GFSI approval). Audits must include a review of establishment HACCP Program and Plan(s) and their Food Safety Programs. If audits are unavailable, a detailed supplier approval questionnaire of the facility's food safety programs must be obtained.

All US SSMG facilities that are direct importers operate under the requirements of the U. S. Department of Commerce National Oceanic and Atmospheric Administration's (NOAA) Magnuson-Stevens Fishery Conservation and Management Act; Seafood Import Monitoring Program (FR 81:237 p 88975 [Docket No. 150507434-6638-02]) and the SFCR importation requirements.

All SSMG facilities must maintain constant compliance with 9 C.F.R. Part 416 "Sanitation" and in Canada under SFCR (SOR 2018-108, Division 4 (*Maintenance and Operation of Establishment*) Subdivision B (*Sanitation, Pest Control and Non-food Agents*)). This includes operating under written Sanitary Standard Operating Procedures, performing and documenting daily Pre-Operative Sanitation Inspections, performing and documenting daily Operational Sanitation Inspections and verifying and documenting utensil and equipment sanitizer applications and strengths. Additionally, these sanitation activities are verified through environmental sampling for sanitary conditions. Also, US SSMG facilities operate under compliance with 21 C.F.R. Part 110 "Current Good Manufacturing Practices In Manufacturing, Packing, Or Holding Human Food.", and in Canada under SFCR (SOR 2018-108, Division 4 (*Maintenance and*

Sysco Corporation · 1390 Enclave Parkway · Houston, Texas 77077-2099 · 281-584-1390

*Operation of Establishment*) Subdivision D (*Conditions Respecting Establishments*)). This includes operating under written plant Good Manufacturing Practices that include sanitary operating and hygiene practices for all plant personnel with verification activities that exceed governmental minimums.

#### Parasite Control in Frozen Fish Items:

US SSMG HACCP plans follow the recommendations in the FDA FISH & FISHERIES PRODUCTS HAZARDS & CONTROLS GUIDANCE: fourth edition. Refer to Chapters 3 and 5 of this guidance regarding information on parasites in seafood.

To control parasites in seafood, this guidance in Chapter 5 page 91 under Parasite Control specifically states "The process of heating raw fish sufficiently to kill bacterial pathogens is also sufficient to kill parasites." Given the intended use of SSMG finfish products, unless specifically labeled otherwise, these products are intended to be consumed after cooking, and parasites are not considered a hazard in the US SSMG Seafood HACCP Plans covering those products.

Regarding consumption of raw finfish, the FDA Model Food Code, 2017 states in Chapter 3 section 3-402.11 that:

*"(A) Except as specified in ¶ (B) of this section, before service or sale in READY-TO-EAT form, raw, raw-marinated, partially cooked, or marinated-partially cooked FISH shall be:*

- (1) Frozen and stored at a temperature of -20°C (-4°F) or below for a minimum of 168 hours (7 days) in a freezer; (2) Frozen at -35°C (-31°F) or below until solid and stored at -35°C (-31°F) or below for a minimum of 15 hours; or (3) Frozen at -35°C (-31°F) or below until solid and stored at -20°C (-4°F) or below for a minimum of 24 hours.*
- (2) Paragraph (A) of this section does not apply to: (1) MOLLUSCAN SHELLFISH; (2) A scallop product consisting only of the shucked adductor muscle; (3) Tuna of the species *Thunnus alalunga*, *Thunnus albacares* (Yellowfin tuna), *Thunnus atlanticus*, *Thunnus maccoyii* (Bluefin tuna, Southern), *Thunnus obesus* (Bigeye tuna), or *Thunnus thynnus* (Bluefin tuna, Northern); or (4) Aquacultured FISH, such as salmon, that: (a) If raised in open water, are raised in net-pens, or (b) Are raised in land-based operations such as ponds or tanks, and (c) Are fed formulated feed, such as pellets, that contains no live parasites infective to the aquacultured FISH. (5) FISH eggs that have been removed from the skein and rinsed."*

SSMG locations do distribute certain finfish that originate from aquacultured sources where the pelleted feed does not contain parasites. In such instances the suppliers' letter of guarantee regarding their aquaculture feeding practices will be made available upon request.

US SSMG locations which ship and repack shucked or live shellfish abide by the National Shellfish Sanitation Program (NSSP) and the Interstate Shellfish Sanitation Conference. This includes compliance with the 2023 Revision of the NSSP Guide for Control of Molluscan Shellfish. Each SSMG location that handles shellfish amenable to the NSSP controls is registered under the NSSP as an Interstate Shellfish Shipper (SS).

This letter applies to the following SSMG establishments:

Buckhead Atlanta, College Park, GA	Buckhead Chicago, Hampshire, IL
Buckhead Denver, Aurora, CO	Buckhead North Carolina, Charlotte, NC
Buckhead Edmonton, AB	Buckhead Houston, TX
Buckhead Mid Atlantic, Landover, MD	Buckhead Minnesota, St. Cloud, MN
Buckhead New Jersey, Lakewood, NJ	Buckhead New York, Edison, NJ
Buckhead Ohio, Northwood, OH	Buckhead Orlando, FL
Buckhead South Florida, Medley, FL	Incredible Fish, Medley, FL
Newport Northern CA, Fremont, CA	Newport Portland, OR
Newport Southern CA, Irvine, CA	

Sincerely,



Norlyn C. Tipton, II, Ph.D.  
FSQA Sr. Director, Specialty Meat Group  
Sysco Corporation  
1390 Enclave Parkway  
Houston, TX 77077  
Tel: (281) 584-5049, Fax: (281) 584-1240  
E-Mail: [Tipton.Norlyn@corp.sysco.com](mailto:Tipton.Norlyn@corp.sysco.com)

Sysco Corporation · 1390 Enclave Parkway · Houston, Texas 77077-2099 · 281-584-1390