

HACCP PROGRAM

DiCarlo’s inter-departmental HACCP Team has developed a comprehensive HACCP Plan that starts with a thorough hazard analysis to identify critical control points controlled through either prerequisite programs or detailed process controls. A fully integrated training program for all employees ensures all food products are handled safely and properly throughout the distribution cycle.

HACCP Team

The HACCP Team is comprised of Executives, Department Managers and employees who are trained in our HACCP Program and who have direct responsibility for ensuring the program it is effective and followed. Several members have also completed their HACCP certification and PCQI training.

Products under consideration for the DiCarlo HACCP Plans:

- In-shell Oysters, Clams & Mussels
- Seafood Salad, Soups & Spreads
- Pasteurized Crab Meat & Smoked Salmon
- Tuna & Mahi Mahi
- Salmon (w), Sea Bass (f), Cod, Halibut (w)
- Salmon & Tilapia (f), Flounder & Scallops
- Swordfish
- Frozen Seafood
- Canned Seafood
- Raw, Fresh Meat
- Refrigerated, Ready to Eat Products
- Frozen Food (Non-Seafood: Raw)
- Frozen Food (Ready to Eat) **Hazard Identification & Analysis**

HACCP-Trained Personnel continually check for the three types of hazards, biological, chemical and physical, at all steps in our handling of the product. Monthly training takes place in order to keep all personnel aware of the possible hazards associated with food distribution.

Prerequisite Programs

Prerequisite programs are established and followed to reasonably maintain control of hazards that could pose a threat to the integrity and safety of DiCarlo products. These programs include:

GMP	Outgoing Shipment	Quality Control
Incoming Goods	Sanitation	Food Defense
Proper Storage of Goods	Pest Control	Foreign Material
Allergens	Product Returns	Preventive Maintenance

Process Controls – Managing Critical Control Point Limits

Critical Control Points (CCP)

Hazards that are not reasonably controlled under prerequisite programs are identified and critical limits, monitoring procedures and corrective actions are established, verified and validated in accordance with the recommendations stated in the FDA's Fish and Fishery Products Hazards and Controls Guidance and USDA Guidance for each CCP.

Deviations Require Corrective Action

Refrigerated Product < 41°F

Frozen Products (maintain in a Frozen State) <32°

Control Point Temperature Limits

Daily guideline limits to operate within to prevent reaching critical control limits. Management and the HACCP Team are alerted prior to reaching critical limits so action is taken to prevent a food safety concern.

Refrigerated Product

< 38°F (Storage)

< 40°F (Receiving & Shipping)

Frozen Product (maintain in a frozen state)

< 11°F (Storage)

< 20°F (Receiving & Shipping)

Monitoring Procedures

Receivers verify the temperature of the delivery vehicle is under our critical control limits and record the temperature on the Incoming Vehicle Inspection form. Receivers ensure that appropriate tags and/or labels are affixed to product by the vendor and fresh fish is surrounded by ice at time of delivery. Temperature monitoring devices retrieved from product, verified upon receiving and temperature is recorded.

All temperature-controlled locations (refrigerated dock, coolers and freezers) are continuously monitored and alarmed 24 hours a day, 7 days a week on-site and remotely by an outside vendor to ensure Control Point time and temperature limits are not exceeded without proper corrective action. If at any time conditions start to approach a Critical Control Point level, product is immediately moved before critical time and temperature limits are exceeded until the conditions can be properly restored.

Vehicle temperatures are also monitored during transportation until all product is delivered or returned to the warehouse.

Corrective Action

Corrective actions are set for each step in the flow diagrams. If a failure to maintain any of the CCPs within the distribution cycle occurs, Management determines if the product is still safe for human consumption and the appropriate corrective action is taken and documented.

Recordkeeping

Logs, checklists, continuous monitoring devices, smart phone apps, desktop applications and verification records are used to ensure all records are up to date and capture all significant events. Only HACCP certified DiCarlo employees review data and make changes to the HACCP Plan. All employees are trained in HACCP and encouraged to make recommendations to the HACCP team.

HACCP Plan Verification & Validation

Monitoring procedures are based on the recommendations from the FDA Fish and Fishery Guide, USDA Guidance and professional guidance from regulatory inspectors. Management



reviews receiving and loading documents and temperature control logs weekly. The HACCP plan is reviewed in depth and revised as needed at least annually.