

## MOBILE FISH VAN TRADERS GUIDANCE PACK

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#### Introduction

This pack has been designed by Grimsby and Immingham Port Health Authority to assist mobile fish traders both to comply with the law and to provide a source of reference and "best practice".

It is a legal requirement that all food businesses conduct a hazard analysis of their business, adopting appropriate controls and having appropriate documentation to demonstrate the effectiveness of these controls.

This document is intended to provide you with a framework of information and advice which you should tailor to suit your actual activities and products.

You should delete or remove any pages not relevant to your trade. If you handle products not detailed here, you should use this document as a guide to supplement the controls in a similar style.

If you need further advice on any of these matters, do not hesitate to contact our office.

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#### Contamination and Cross-contamination

Although a mobile fish van is small and the range of products on sale is limited, there are still risks of contamination and cross-contamination in regular trading.

This advice will assist in operating your vehicle hygienically, ensuring the safety of your customers and complying with relevant food law.

#### The main source of contamination is you!

You must ensure you wash your hands regularly, but in particular;

- Before you start trading
- Before selling ready to eat items
- After eating, drinking or smoking.
- After using the toilet.
- · After carrying out any cleaning.

You should wear clean overclothing, in good condition and you may wish to wear a hat. Although not a legal requirement, it will prevent hair contaminating your products and presents a hygienic image to your customers.

Cover any cuts and abrasions on your hands with waterproof plasters – blue plasters are recommended in the food industry because they will show up in food if accidentally lost.

It is also considered best practice not to wear watches or jewellery, just in case parts fall off and become contaminants.

If you suffer from the symptoms of food poisoning, including vomiting or diarrhoea, then you must cease trading and do not resume working until 48 hours after your last symptoms cease. After that, remember you may still be infectious, so continue to practice good personal hygiene with regular handwashing.

Be alert to any sources of contamination within the selling area of your van – pens, paperclips, elastic bands etc. If these are loose in the selling area, it will only be a matter of time before you accidentally sell one to your customers – and this is an offence!

In order to ensure the safety of your customers and complying with the law, you will need to separate these items in your vehicle and you will also need to ensure you do not transmit the germs present on the raw fish onto the surface of the cooked ready to eat items.

The surface of raw fish will definitely be contaminated with bacteria – this is an inevitable consequence of the gutting and filleting process, however this will not be an issue for your customers as they will be cooking the fish before consumption and normal cooking will kill all germs.

You will probably be selling a combination of raw and cooked products;

Raw	Ready to eat
Wet fish Cold smoked fish (Cod & Haddock) Live crabs Live shellfish	Cooked and dressed crabs Hot smoke fish (Mackerel) Prawns Crabsticks Smoked salmon
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In the case of ready-to-eat items, your customer will probably eat the food cold, or slightly warmed – neither of which will kill any germs present, this is why it is essential you have good practices in place when selling both categories of food.

Ideally you will sell the customer the ready to eat items first, however it is inevitable you will be selling both categories at the same time.

The simplest option to ensure safety is to only supply ready to eat items which are wrapped. The foodstuffs will be protected from accidental contamination by the wrapper, however you should always ensure the wrapping is intact. If you chose to sell loose fish and loose ready to eat items, you must consider the following;

- Wash your hands before handling the ready to eat items
- Have two sets of scales if possible
- If not, clean the pan of your scales with sanitiser between transactions and try to line the scale pan with waterproof paper, avoiding the food contacting the pan itself. This will also apply to knives, cutting boards etc.

If you chose to wear gloves, ensure you know what you are trying to achieve. The only logical methods are to wear clean gloves every time you serve a ready to eat item, discarding the gloves afterwards. Do not have a spare glove or pairs of gloves at the scales to be slipped on when you need them – they will have become contaminated by their surroundings and if you put them on with dirty hands, you cannot avoid contaminating the outer surfaces of the gloves, ready to transfer germs to the ready to eat items.

Please also be aware that it is normal for people to want to wipe or wash dirty hands, but people wearing gloves do not feel so uncomfortable and tend to wash their hands less frequently. Frequent handwashing remains the most effective means of avoiding transferring harmful bacteria onto food.

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#### Cleaning

You need to keep your mobile clean, not only is this a legal requirement, you will want to present a clean and hygienic image to your customers.

You should try to minimise any difficult to clean nooks and crannies in the construction of the vehicle. If all the inner surfaces are smooth, impervious and without joints then cleaning will be quicker, simpler and more efficient.

Your mobile will have been cleaned before you loaded up for your round. You will also need to carry out interim cleaning whilst you are selling.

In order to make cleaning effective, you should devise a simple schedule, identifying the various areas of the mobile and specifying;

- How often these will be cleaned
- What chemicals you will use
- What equipment cloths, brushes etc. you will use
- Whether you need to be aware of the nature of the chemicals used, for your own welfare and to avoid contaminating the fish.

The ideal cleaning chemical for use in such locations is a sanitiser, which combines the cleaning effect of a detergent, with the germ-killing properties of a disinfectant. You can buy these readily from retailers and wholesalers, but ensure you choose a brand which is declared "food safe".

Avoid the use of traditional disinfectants and bleach. These often have very strong odours and tastes which can be transferred to the fish.

Ensure you read and follow the instructions supplied with the sanitiser. Doing so will avoid overuse and will ensure the germ-killing properties are effective.

You will need to wipe down surfaces while you are trading, have a bottle of sanitiser and a good supply of disposable cloths to hand at all times. Again, not only is this good hygiene practice, your customers will notice your hygienic standards.

Disposable cloths are the preferable method of cleaning within your mobile as they can be disposed of once soiled, do not shed particles and, if coloured differently, can be used for specific jobs e.g. red cloths for cleaning around raw fish and green cloths around ready to eat foodstuffs.

Area or item to be cleaned	Frequency	Chemicals & Products used			

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#### **Temperature Control**

Effective temperature control of fish and fishery products is essential in maintaining quality, extending shelf life and ensuring the safety of the products.

It is also a legal requirement to maintain products at specified temperatures.

Fresh fish must be stored at the temperature of melting ice. It is traditional for fish vans to store and display their fresh fish and fish fillets in ice.

To make this process effective, ensure you source clean ice from your supplier. Bury the fish in the ice, leaving a small quantity resting on the surface of the ice for display purposes. At the end of the selling period, ensure all fresh fish is buried in the ice.

This is particularly important when selling mackerel and tuna, fish which can become harmful if not chilled. You will want to wrap your tuna so that the ice does not wash blood from the flesh, spoiling its appearance. You may also wish to advise your customers that they must keep these products cold until they are ready to cook them.

Fishery products including crabs, fishcakes, smoked fish, fresh prawns must be stored at or below 8°c, ideally lower if possible. Without powered refrigeration of the selling area, this may be difficult to achieve. The large volume of ice in the well of the selling area, combined with good insulation of the walls and roof could combine to reducing the ambient temperature to a safe level, however this will rise as soon as the doors are opened.

It may be possible to chill these products by resting them on ice, whether in the fresh fish area, or on the shelves, however it is essential that there is no possibility that contamination from the raw fish is allowed to pass to the ready to eat items, as this may well cause food poisoning in your customers

Frozen fishery products must be sold at or below -18°c, although they may rise to -15°c for short periods.

As above this will be exceptionally difficult to achieve in a mobile vehicle without the benefit of a powered freezer, or, at least, a well insulated cabinet or conservator.

You should monitor the temperature of your products, particularly the high-risk chilled and frozen foodstuffs. A probe thermometer can be used on a daily business to confirm that your products are being stored legally. A simple probe thermometer can be bought for around £10.00 - £15.00.

If you choose to record your readings, this will provide evidence of your commitment to food safety and will provide you with some defence in the event of a complaint that products were not of a suitable quality.

You must plan ahead for unexpected events such as exceptionally hot weather or traffic delays. Ensure your storage systems are sufficiently robust to cope with these situations, and if in doubt, make regular checks on the actual temperature of your products to ensure they remain within the safe and legal limits.

If you find that your products have exceeded the legal temperatures, you should dispose of them, however you may sell defrosting frozen products on that day only, explaining to your customers they are to be consumed as a chilled product and not to be refrozen.

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#### Temperature record

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#### **Smoked fish**

Mobile traders will generally sell up to three categories of smoked fishery products;

- 1. **Cold smoked** fish intended to be eaten cooked this will include smoked cod, smoked haddock, kippers, Finnan Haddock.
- 2. **Hot smoked** fish intended to be eaten without further preparation this will generally be hot smoke mackerel, but will also include hot smoked salmon and Arbroath Smokies
- 3. **Cold smoked** fish intended to be eaten without cooking this is generally traditional smoked salmon but may also include smoked halibut. Although not smoked, you may also include Gravadlax in this category.

It is important to differentiate between these products to ensure you practice good food hygiene.

- 1. In this case, the products must be kept below 8c and they may be stored with your fresh fish, as they are still a raw product. Consumers will be cooking these products and, if carried out properly, this will eradicate any bacterial contamination naturally present on the surface of the fish. You will wish to have some separation, to avoid getting them wet from the fresh fish and in turn to prevent the smoky flavour passing to your wet fish.
- 2. In this case, the product must be kept below 8c, much lower if possible, as bacteria and toxins formed by both bacteria and natural processes will grow even at this temperature. Consumers will be eating the product exactly as you sell it, without further cooking so it is essential you avoid any actions or activities which could contaminate the product or allow bacteria to grow.
- 3. In this case, although the product is actually still raw, it will be eaten in that condition, so, for the same reasons as above, it is essential you handle this product as "ready to eat" and practice the same levels of hygiene as in point 2 above.

What smoked fish do I sell?	
Where do I store it?	
What is its temperature?	
How do I check the temperature?	

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#### Live shellfish

Oysters, mussels, clams etc.

The sale of live shellfish needs careful thought and planning both to protect the products and your customers.

Only buy from reputable suppliers

Check your shellfish to ensure they are alive – if you tap the shells, they should close; any which do not close are dead and must not be sold. Keep the shellfish cool, between 4-8c

Do not immerse in water – they may die or become contaminated Do not store in ice - this will kill them

Store them separate from your wet fish to avoid germs on the fish contaminating the shellfish

Store them separate from your ready to eat foods as the outer surfaces of the shells may be contaminated with germs and dirt.

Ideally you should store the shellfish in a bowl to avoid any liquids dripping onto other foods.

Live shellfish must be sold with a label which details their origin, date of processing and batch details. This is a legal requirement.

If you buy a whole sack of mussels or a whole box of oysters or clams, you must also receive the label. If there is no label available, reject the consignment and inform this office.

If you then split batches for your customers, you must keep the label for 60 days, just in case an incident of food poisoning occurs and we need to trace the origins of the shellfish.

If you sell the whole package to your customer, this will not be necessary, but you may still wish to copy the data, in case your customer disposes of the label themselves.

If you buy a part batch from your supplier, ask for a copy of the label which came with the whole batch and retain those details for 60 days.

Live shellfish sold			
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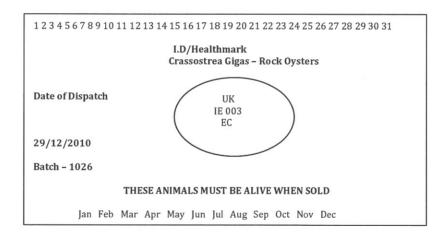
#### Guidance on Handling of Live Oysters at Retail and Catering Outlets

Handling and serving live oysters is different to handling and serving other ready-to-eat foods. You need to look after a live animal and ensure that it remains alive until it is either eaten or cooked. In the event of an incident or recall it is essential to be able to trace oysters back to the dispatch centre they came from.

These notes will help you to maintain traceability and maintain your oysters in the best condition so that the health and satisfaction of your customers is safeguarded.

#### **Traceability**

- All packages of live oysters must be accompanied by a dated health/ID mark on an indelible, water resistant label like the one shown below.
- This label shows the identification number of the establishment from which they may have come (in the ellipse), ideally a batch number, date of packaging and declaration that animals must be alive when sold. Alternatively, a minimum durability date could be used.
- These details should be sufficient to identify the actual bed from which the oysters were harvested. Keep the health mark details for at least 60 days in case this information is needed. The easiest way to do this is to affix the label into your diary on the day of delivery.



Try to avoid using oysters from different suppliers at the same time, but if this is unavoidable devise your own method of being able to identify who ate oysters from which supplier.

#### Reception/delivery

Check that the packages of oysters are closed & labelled as above. If there is no label, bearing the required information, attached to the packaging reject the consignment.

Fishmongers' Hall London Bridge London EC4R 9EL Where possible check that the vehicle is clean and that the oysters have not been mixed with raw fish or kept in hot and dirty conditions.

#### Storage

- Store the oysters in a deep bowl (to prevent leaks) and away from other open foods. Do not store below raw meat or fish.
- Keep them cool (ideally 4°C 8°C) Do NOT re-immerse oysters in water. They will have been properly purified at the depuration centre and any further immersion risks recontaminating them.
- Do not seal live oysters in an airtight container they will not be able to breathe and will die.
- Do not store on ice they may die.
- The display and keeping of oysters on seaweed is discouraged.

#### Handling

- Wash (and dry) your hands thoroughly using warm soapy water, before handling and opening the oysters.
- Ensure that the knives and other equipment (including gloves if you wear them) used for opening the oysters are all clean before you start.
- Check that the outside shells of the oysters are clean and avoid pushing any mud or bits
  of shell into the oyster as you open it.
- Use a cleaned or different shucking knife for each batch.
- Serve promptly. Ideally only shuck oysters to order.

#### Food Handlers Fitness to work

- It is important to ensure that any food handlers suffering from gastrointestinal illness are
  excluded from work relating to food handling duties and that they cannot enter a food
  handling area. This exclusion is usually for 48 hours after an individual no longer shows
  symptoms of illness. This is particularly important when handling products that are served
  raw, such as oysters.
- Bacteria and viruses can still be found in someone's faeces after symptoms stop. It is
  therefore important that managers continue to exclude food handlers for a period of time
  after this. It is recommended that people should be excluded for 48 hours after they stop
  showing symptoms of diarrhoea.
- In the event of your customers informing you that they have been ill as a result of eating
  oysters at your premises, contact your local Environmental Health Officer and provide
  details of the relevant label.

#### Further information

Information on oysters and other shellfish can be found on the internet at:

www.food.gov.uk/foodindustry/farmingfood/shellfish/,

www.seafish.org/ www.shellfish.org.uk/

http://www.shellfish.org.uk/how to videos.htm

Details on food handlers' fitness to work can be found at:

http://www.food.gov.uk/multimedia/pdfs/publication/fitnesstoworkguide09v3.pdf

#### **Scombrotoxic Food Poisoning**

#### What is it?

Scombrotoxic food poisoning (or histamine poisoning) is caused by eating foods which contain high levels of histamine. Histamine and other chemicals are formed by the growth of certain bacteria and their subsequent enzyme action. This can sometimes occur during production of a food but more generally by spoilage caused by poor storage conditions. It is quite rare, with about 50 suspected incidents per year in England and Wales.

#### What foods are associated with scombrotoxic food poisoning?

Fishery products such as tuna (fresh/canned), kippers, sardines (fresh/canned), mackerel, pilchards (canned) and herring are the primary sources. Other products have included Swiss cheese, and those which are fermented e.g. beer.

The toxin forms in a food when certain bacteria are present, and time and temperature permit their growth. Distribution of the toxin within an individual fish fillet or portion can be uneven, with some sections of a product causing illness and others not.

The toxin cannot be detected by smell, taste or appearance of the food. Chemical analysis is the only reliable method for testing if a product contains high level of histamine.

#### What are the symptoms?

Initial symptoms may include a tingling or burning sensation in the mouth, a rash on the upper body and a drop in blood pressure. Frequently, headaches and itching of the skin are encountered. The symptoms may progress to nausea, vomiting and diarrhoea. Hospitalisation may be required, particularly in the case of the elderly, or those with existing health conditions.

The onset is rapid, ranging from immediate to 30 minutes. The duration of the illness is usually 3 hours, but may last several days. Treatment is with antihistamine medication.

#### What can you do to prevent Scombrotoxic food poisoning

Cooking, freezing or canning do not reduce the toxic effect. It is therefore important to have controls which ensure that susceptible foods are stored and handled under conditions which reduce the growth of bacteria.

- Obtain fish from reputable suppliers
- Ensure that fish is under adequate temperature control when it is purchased and delivered e.g. under ice or chilled or frozen.
- Store fish as close to 0°C as possible.
- Defrost frozen fish in a refrigerator.
- Remind your customers they must keep their fish in the refrigerator until they are ready to cook it.
- Any leftovers must also be refrigerated as scombrotoxin can still form in cooked fish.

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#### Worms in fish and fishery products

On occasion, consumers may find worms in their fish fillets. Naturally this may cause alarm or revulsion and the following guidance is intended to explain their presence and the absence of risk from such contamination.

All living creatures suffer from parasitic infections and fish are no exception. Most people will call these "cod worms" however many species of fish can be affected by one of several species of worm.

The presence of worms is a natural phenomenon and may be related to the nature of the fishing grounds where the fish were caught and the population of other marine species such as seals, which host part of the life cycle of the worm.

When fish are being filleted, skilled filleters will be looking out for worms which they can remove with the tip of their knife, however worms in the thicker flesh are almost impossible to see with the naked eye. Some major processors will also subject their fillets to "candling" where the fillets are passed over a powerful light source and any deep-seated worms will show up as a shadow, enabling their removal by tweezers, however candling is not normally carried out in smaller businesses.

In fresh fish, worms may still be alive and may migrate to the surface of the fish in chilled storage or after being brined and/or smoked.

Worms in fish will be readily killed by normal cooking temperatures and do not present any risk to the consumer. Even the consumption of raw fish may be safe if the product is marinated in salt or vinegar, such as in the case of rollmops, or where the fish has been deep frozen. Both these activities will kill the worms.

If you continue to be concerned about the presence of worms in fish, please contact your Local Authority Environmental Health Department for further guidance.

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On acception, consumers may find warms to user fish filters, Naturally this may ceuse blanth or revulsion and the following goldence is uner, ded to explain their arcsonce and the stoccoop of high from such charging at long.

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Fish Van Traders -Responsibility for Trade Waste



# Litter and Waste Management Advice for the Van Trade

It is essential for the reputation and financial viability of the Grimsby fish industry that all parties work together to improve standards, and this leaflet has been designed to remind you of your responsibilities and how you can comply with the law.

Van sales generate waste packaging and unsold food, both of which must, by law, be disposed of in a controlled manner.

You may dispose of your waste packaging at a controlled site e.g. BIFFA.

Alternatively you may dispose of your waste with one of your fish suppliers, but this must be with their agreement and we would suggest you use the Waste Disposal Agreement shown in this leaflet.

Your food waste must be disposed of in an offal

## You cannot;

- Put your van waste in your bin at home
- Put your waste near and around bins
- Put your waste in trader's bins without permission
- Litter or fly-tip

When we inspect your vehicle we will also be asking how you dispose of your waste.

### Penalties

- Using your bin at home it will not be collected.
- Littering £50 instant fine
- Fly-tipping £Unlimited fine
- Unable to prove where you dispose of your waste £300 instant fine

If all the parties involved in the fish industry cooperate to improve standards we will see a cleaner, tidier, better managed Dock Estate in keeping with Grimsby's "Food Town" status and promoting fish as a safe and healthy food product.

For further advice, call Grimsby 347 320 and speak to one of our Port Health staff.

## Chris Melville

Principal Environmental and Port Health Officer.
October 2010

# Waste Disposal Agreement (Duty of Care)

In accordance with Section 34 of the Environmental Protection Act 1990, I agree that the following trader may dispose of the packaging waste from their fish van in my trade waste container.

Date	Merchant's signature	***************************************	***************************************	Merchant's Name and address	Van registration number	***************************************		Name and address of Van Trader
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Retain this copy on your van for examination by

inspection staff.