

Introduction

This guide provides mobile fishmongers with practical advice on how to comply with general food best practice, legislation and related requirements. It has been produced in consultation with the Sea Fish Industry Authority, the seafood industry and other relevant stakeholders. The use of this guide is not compulsory or legally binding. However, where a mobile fishmonger is following the guidance it could be taken into account by an enforcement authority if challenged.

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

This documentation is intended to provide mobile fishmongers with a framework of information and advice they can tailor to suit their actual activities and products.

Not all the pages will be relevant but will offer the correct advice when needed. Therefore if you handle products not detailed here this document should be used as guide to supplement the controls in a similar style.

If further advice or clarification on any of these matters is required do not hesitate to contact any of the following: Grimsby Fish Merchants Association 01472 350022, the author, Chris Melville, CMCIEH Chartered Environmental Health Practitioner, 07776 703276 or the Sea Fish Industry Authority, 01472 252300.

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Vehicle Design and Configuration

Mobile fish vehicles in use vary very little in design. Generally there will be a selling area to the rear of the vehicle which may be supplemented, depending upon the size of the vehicle, with a middle area which may contain a freezer or chiller, wrapping and packing supplies and in some cases further supplies of chilled fish to restock the selling area.



The selling area invariably will comprise a tank to contain ice within which the chilled fish is stored. The ice tank may have a surround upon which a cutting board and scales are mounted, and which also provides useful storage space for knives, wrapping and items for sale.

The inner surfaces of the selling area may be panelled in plastic cladding or may be formed in situ by a glass fibre liner. Ideally the selling area surfaces should be light-coloured, easy to clean and free of nooks and crannies. It is recommended that exposed wood is not used in fabricating the lining as it cannot be cleaned effectively, it can however, be used to form the shape of the lining if protected by the cladding.

The tank will have a drainage tap to allow melt water to be drained from the tank. Care must be taken to only drain water in locations where the lingering smell of fish will not give rise to complaints.

The selling area and the middle storage area, if present, should be equipped with sufficient lighting to enable the customer to see the products on offer and to enable you to ensure the area is clean and free of contaminants.

Shelving may be located above the selling area to display dry goods such as crumb, batter mix etc and to display products such as smoked fish, crabs and smoked salmon which cannot be stored with the raw fish in the ice tank.

These shelves may be designed as deep trays to hold a bed of ice onto which chilled products can be stored under chilled temperatures.

The vehicle must be provided with supplies of hot and cold water for hand washing and to clean the surfaces of the vehicle while trading. An insulated flask of hot water of sufficient capacity is the most basic form of compliance. It is much more preferable to install a system which is heated from the vehicle's electrics, by a gas cylinder, or plumbed into the vehicle's engine cooling system. It will be much easier to ensure a constant supply of hot water and you will simply need to either carry some cold water to replenish the system or collect water on your travels from customers or from market operators. These systems should be installed by competent professionals and in the case of gas fittings this is a legal requirement.

If you trade on a market, or in the grounds of a fixed business, you may make an arrangement to obtain supplies of water from the market operator or trader.

You will need to provide a bowl to wash your hands, some soap and a supply of towels and another bowl with cleaning materials for surface cleaning.

Hand sanitisers must only be used to supplement hand washing; they are not suitable as a replacement.



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 any food handling.
- Before selling unwrapped 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 operating 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 hand washing.

Government rules around coronavirus apply to you and your business; make sure you keep up to date with the latest Government advice.

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!

Raw and Ready to Eat Products

In order to ensure the safety of your customers and to comply 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 and 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, examples;

Raw

Wet Fish
Cold Smoked Fish (Cod & Haddock)
Live Crabs
Live Shellfish

Ready to Eat

Cooked and Dressed Crabs
Hot Smoked Fish e.g. Mackerel
Prawns
Crabsticks
Smoked Salmon

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 should serve 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 that 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 hand washing remains the most effective means of avoiding transferring harmful bacteria onto food.

Raw Items I Sell	Ready to Eat Items I Sell

Cleaning

You need to keep your mobile vehicle clean, not only is this 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 that is declared “food safe”. FSA recommendation is to seek a product which complies with BS EN 1276:1997 or BS EN 13697:2001

Avoid the use of traditional disinfectants and bleach. These often have very strong odours and tastes that 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. Sanitisers do not work immediately, they need what is known as a “contact time” to work effectively and kill germs.

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 for ready-to-eat foodstuffs.

Area or Item to be Cleaned	Frequency	Chemicals or 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.

It is advised to monitor the temperature of all products from point of intake to point of sale. It is good practice to keep a record of product/raw material temperatures from your supplier.

Chilled fish must be stored at the temperature of melting ice. It is traditional for fish vans to store and display their chilled fish and fish fillets in ice. To make this process effective, ensure you source clean ice from your supplier. Bury the fish in ice, leaving a small quantity resting on the surface of the ice for display purposes. At the end of the selling period, ensure all chilled fish is buried in the ice.

This is particularly important when selling mackerel and tuna, fish that can become harmful if not chilled (see later chapter). 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, and chilled 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 chilled 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 basis to confirm that your products are being stored legally. You should check your probe thermometer weekly to

In the case of chilled fishery products, these pieces of legislation have some issues in common and overlap.

For all of your chilled fishery products, you should display the following to the customer;

- The common name of the fish – e.g. Haddock
- The scientific name of the fish – e.g. *Melanogrammus Aeglefinus*
- The production method – i.e. “Caught” or “Farmed”
- The catch method – e.g. Trawl, line caught etc.
- The catch area – e.g. Irish Sea, or if farmed the country of origin

In addition, if the chilled fish and fishery products you are selling have been previously frozen, you must also declare this to the customer.

At the time of writing this guidance, it will generally be impossible for you to accurately display the catch method and catching area as this detail of information is not generally available throughout the industry.

Unless you have received specific assurances from your supplier on the origins and/or the catch method – e.g. “Line caught Icelandic” then it is better not to speculate on these details as you may mislead your customer.

You may choose to display the information next to each piece of fish with a tag or spiked label, alternatively, you may wish to display a chart in the selling area detailing the fish you sell, their scientific names and whether they are caught or farmed. You may also add details of the catch area and catch method if these are made available by your supplier.

Allergens

There are currently 14 allergens listed which must be declared to the consumer if they are used as ingredients. These are:

- Nuts (Namely almonds, hazelnuts, walnuts, pecan nuts, Brazil nuts, pistachio, cashew, Macadamia or Queensland nut);
- Peanuts;
- Eggs;
- Milk;
- Fish;
- Crustaceans;
- Molluscs;

- Cereals containing gluten (namely wheat (such as spelt and Khorasan wheat) barley, rye and oats);
- Celery;
- Lupin;
- Mustard;
- Sesame seeds;
- Soya and
- Sulphur dioxide (when added and above 10mg/ kg in the finished food and drink).

There is variety of ways that you can inform your customers if your food contains any of these ingredients. For pre packed foods supplied to you, they must already be labelled by the producer. For loose foods you can display a sign indicating your foods contain certain allergens, or a sign advising your customers to ask if they have a specific allergy. You must be able to provide this answer. If you did not prepare the food yourself, for example when selling individual items such as breaded fish fillets from a bulk pack, ensure you keep the information or label provided with the product so you can inform your customers of any allergens on request.

From 1 October 2021, the labelling of food that is Pre Packed for Direct Sale (PPDS) will change. This is to ensure that any allergens in these foods are correctly labelled. From 1 October 2021, PPDS food will need to be labelled in the same way as pre packed food. It will need to have a label with a full ingredients list with allergenic ingredients emphasised within it.

'Pre Packed for Direct Sale' means food sold from the premises on which it was packed. This would include your home or other business premises where you prepare food. Examples might be a dressed crab which you have prepared and wrapped for hygiene purposes. 'Pre Packed for Direct Sale' does not include food that you wrap at the request of the customer prior to purchase.

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, and Finnan haddock.
2. **Hot Smoked** fish intended to be eaten without further preparation – this will generally be hot smoked 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 Gravavlax in this category.

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

1. **Cold smoked fish.** In this case, the products must be kept below 8°C and they may be stored with your chilled 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 chilled fish and in turn to prevent the smoky flavour passing to your wet fish.
2. **Hot smoked fish.** In this case, the product must be kept below 8°C, 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 that could contaminate the product or allow bacteria to grow.
3. **Cold smoked fish, ready to eat.** 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?	

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 4-8°C.

- Do not immerse in water including spraying or melt water – they may die or become contaminated.
- Do not store in ice – this will kill them.
- Store them separate from your chilled 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 bivalve molluscs such as mussels, clams and oysters carry a greater risk of causing food poisoning so there are additional legal traceability requirements designed to keep your customers safe.

- Mussels must be sold in packages with a hygiene label attached and they should be delivered to you prepacked and labelled in the correct sized packages. You do not need to keep a record of individual labels; only a record of who supplied the mussels to you.
- Some higher value species such as oysters are sold individually. Although they will have left the dispatch centre in sealed packages with a hygiene label attached, it is likely that your supplier will have split the package to sell the oysters individually. It is a legal requirement that you have a record of the label just in case an incident of food poisoning occurs and your local food authority needs to trace the source of the oysters. A simple way to do this would be to ask your supplier to let you take a photograph of the label creating a dated log of the traceability information. These photographs must be kept for 60 days.

Live Shellfish Sold

Scombrotoxic Food Poisoning

What is it?

Scombrotoxic food poisoning (or histamine poisoning) is caused by eating foods that 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 Scombrototoxic food poisoning?

Fishery products such as tuna (chilled/canned), kippers, sardines (chilled/canned), mackerel, pilchards (canned) and herring are the primary sources.

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 of testing if a product contains high levels 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 Scombrototoxic food poisoning?

Cooking, freezing or canning does not reduce the toxic effect. It is therefore important to have controls that ensure that susceptible foods are stored and handled under conditions that 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 fish in the refrigerator until they are ready to cook it.
- Any leftovers must also be refrigerated as Scombrototoxin can still form in cooked food.

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 that 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 chilled 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. If you know that any of your customers are going to eat any fish products purchased from you in a raw format, you must advise your customers to freeze these products before they are consumed.

Litter and Waste Management

It is essential for the reputation and financial viability of the seafood industry that all parties cooperate to improve environmental standards. Van traders have an important part to play in this by managing waste from their operations.

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

You may dispose of your waste at an approved site.

You cannot:

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

Penalties for littering and tipping

- Using your domestic bin – it will not be collected
- Littering – can be an instant fine
- Fly-tipping – can be an unlimited fine
- Unable to prove where you dispose of your waste – can be an instant fine

As well as receiving a fine, you can also face imprisonment for littering and tipping and if you can't prove that you have disposed of your waste correctly.

You may, however, come to an agreement with one of your fish suppliers to dispose of waste in their bins. In order to formalise this arrangement, it is recommended you both complete the following section to show this is a joint contract between the van trader and the supplier.

Finally, you must have appropriate facilities to store waste product and packaging in order to prevent cross-contamination. Food waste and non-edible by-products and other refuse are to be stored away from product being offered for sale.

Waste Disposal Agreement

Duty of care

In accordance with section 34 of the Environmental Protection Act 1990, I agree that the following van trader may dispose of their van waste in the trade waste container associated with my business.

Name and address of van trader.....
.....
.....

Van registration number.....

Merchant's name and address.....
.....
.....

Signature of van trader.....

Signature of merchant.....

(Keep this completed record in your van to confirm to investigating officers how you dispose of your waste.)