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SAFE SUSTAINABLE SEAFOOD  
BIA MARA SÁBHÁILTE INBHUNAITHE

# Shellfish Registration Documents and Intermediary Operators

**Dr. Gary McCoy**  
**April 2023**



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# Prior to Harvesting



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## The 'production area' must be:

- Designated
- Classified Production Area?
- Biotoxin Monitoring?
- Phytoplankton Monitoring?
- Open Biotoxin status?
- Documentary Requirements?



<https://www.sfpa.ie/Who-We-Are/News/Details/sfpa-publishes-annual-classification-list-of-irelands-shellfish-production-areas>



Blue mussels



Pacific Oyster



King Scallops



Surf Clams



Razor Clams

- SFPA remit is Food Safety, conducts regular shellfish sampling in all production areas, Monitoring the levels of bacterial contamination of shellfish to determine the risk and assign a Classification status.
- SFPA ensure that the Safety and Quality of the Shellfish placed on the market is not compromised in any manner.

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**SFPA COP for the Microbiological Monitoring of Bivalve  
Mollusc Production Areas  
&  
COP for the Irish Shellfish Monitoring Programme  
(Biotoxins) – V10 2022**

**Available at [www.sfpa.ie](http://www.sfpa.ie)  
Under Seafood Safety  
Molluscan Shellfish / Guidance Documents**

# Principle Hygiene Legislation



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**Reg  
178/2002**

**Hygiene of  
Foodstuffs  
Reg 852/2004**

**Hygiene rules  
Animal Origin  
Reg 853/2004**

**Micro Criteria  
Reg 2073/2005**

**Reg 2019/627**  
Official controls on  
products of LBMs

**Comm Del  
Reg  
2021/1374**

**Reg 882/2004**  
Overall Official controls  
to verify compliance with  
food and feed law (CA)

## Classified relaying and production areas must be periodically monitored to check:

- a) that there is no malpractice with regard to the origin, provenance and destination of live bivalve molluscs;
- b) the microbiological quality of live bivalve molluscs in relation to the production and relaying areas;
- c) for the presence of toxin-producing plankton in production and relaying waters and biotoxins in live bivalve molluscs; and
- d) for the presence of chemical contaminants in live bivalve molluscs.



**The competent authorities shall set up a control system to ensure that products of animal origin harmful to human health are not placed on the market.**

- a) Laboratory tests to verify food business operators' compliance
- b) Verification of compliance with levels of marine biotoxins
- c) Verification of compliance of contaminants
- d) Verification of microbiological quality of the molluscs

# 853/2004 LBM Requirements



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- LBMs Must come from a Classified Production Area.
- All LBMs Must be accompanied by a Shellfish Registration (Gatherer's) Document.
- LBMs can only be harvested from an Open area (Biotoxins)
- Live BMs can only go for retail via a Dispatch centre (approval mark) Must be of A standard.

# Traceability Document

(Annex II, Section VII, Ch 1 pt 3 (EC) 853/2004)



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## Shellfish Registration Document also known as a “Gatherers Document”

Whenever a food business operator moves a batch of live bivalve molluscs between production areas, relaying areas or any establishments, a registration document must accompany the batch.

Book No: SG 1 No. IE\_311001 to 311050(6 digit)



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European Communities Ireland

## SHELLFISH REGISTRATION DOCUMENT BOOK\*

\* As required by EU Food Hygiene Regulations

# Who is a “Gatherer”?

(Annex I, Sec II (EC) 853/2004)



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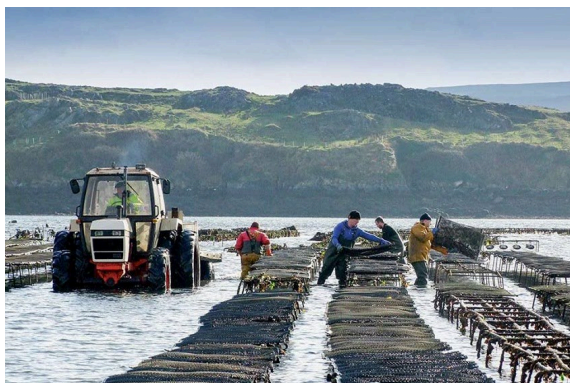
**"Gatherer" means:**

**....any natural or legal person**

**....who collects live bivalve molluscs**

**....by any means from a harvesting area**

**....for the purpose of handling and placing on the market.**



# Shellfish Registration Document (Basic / Minimum Requirements)

(Annex II, Sec VII, Ch 1 4(a) (EC) 853/2004)



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✓ the SRD must be in at least one official language of the receiving MS



the gatherer's identity and address



the date of harvesting



the location of the production area described in as precise detail as is practicable or by a code number;



the health status of the production area



the shellfish species and quantity



the destination of the batch

# Shellfish Registration Document (Relaying Area and Purification Centre) (Annex II, Sec VII, Ch 1 4(b & c) (EC) 853/2004)



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**Sent from**

## **Relaying Area**

**The basic requirements**

**PLUS**

- **location of the relaying area;**
- **duration of relaying.**

**Sent from**

## **Purification Centre**

**The basic requirements**

**PLUS**

- address of the purification centre;**
- duration of purification;**
- dates on which the batch entered and**
- left the purification centre.**

(Annex II, Section VII, Ch X (EC) 853/2004)

## Comm Del Reg (EU) 2021/1374

## Amending Annex III to Regulation

853/2004

**Pt 4 Ch I Section VII: a common model of the registration document for the movement of live bivalve molluscs between establishments should be established.**

Moreover it is common practice that batches of bivalve molluscs may also be sent to Intermediate operators, therefore the registration document should include this possibility.

## CHAPTER X

MODEL OF REGISTRATION DOCUMENT OF LIVE BIVALVE MOLLUSCS,  
LIVE ECHINODERMS, LIVE TUNICATES AND LIVE MARINE GASTROPODS

REGISTRATION DOCUMENT OF LIVE BIVALVE MOLLUSCS, LIVE ECHINODERMS, LIVE TUNICATES AND LIVE MARINE GASTROPODS		
Part I – Supplier	<b>I.1 IMSOC Reference number</b>  <b>I.3 Supplier</b> Name Address Registration or Approval No Country                                      ISO Country code Activity	<b>I.2 Internal reference number</b>  <b>I.4 Receiving food business operator</b> Name Address Registration or Approval No Country                                      ISO Country code Activity
	<b>I.5 Description of goods</b>  <b>Aquaculture</b> <input type="checkbox"/> Natural Banks <input type="checkbox"/>  • CN code or FAO 3-Alpha code   species   quantity   package   batch   date of harvesting   date of starting of conditioning   date of end of conditioning   place of conditioning   date of starting of re-immersion   date of end of re-immersion   place of re-immersion   date of starting of grouping   date of end of grouping   production area   health status including, if applicable, harvested in accordance with Article 62 (2) of Implementing Regulation (EU) N° 2019/627	
	<b>I.6 From relaying area</b> Yes <input type="checkbox"/> No <input type="checkbox"/> Relaying area Duration of relaying Date of starting Date of end	<b>I.7 From purification/dispatch centre</b> Auction hall      Yes <input type="checkbox"/> No <input type="checkbox"/> <b>Purification/dispatch centre/auction hall approval number</b> <b>Date of entry</b> <b>Date of exit</b> <b>Duration of purification</b>
	<b>I.8 From Intermediary operator</b> Yes <input type="checkbox"/> No <input type="checkbox"/>  Name Address Registration or Approval No Country ISO Country code Activity Date of arrival Date of exit	
	<b>I.9 Declaration of the supplier</b>	
	Signature of the supplier: _____ Date: _____	

# Intermediary Operators

(Annex II, Section VII, 1a (EC) 853/2004)



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**Comm Del Reg (EU) 2021/1374 Amending Annex III to Regulation 853/2004**

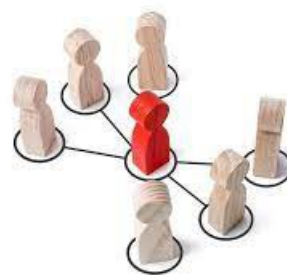
## ‘Intermediary operator’

.....means a food business operator, including traders, other than the first supplier, with or without premises, who carries out its activities between production areas, relaying areas or any establishments.

### Gatherer/Aquaculture



### Intermediary



### Transporter



# Intermediary Operators

(Annex II, Section VII, pt 8 (EC) 853/2004)



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(a) **REGISTERED** if they do not have premises or if they have premises where they only handle, wash and store at ambient temperature live bivalve molluscs, without grouping nor conditioning

OR

(b) **APPROVED** if, in addition to carrying out the activities referred to in point (a), they have a cold store or they group or split batches of live bivalve molluscs or they carry out conditioning or re-immersion

# Intermediary Operators

(Annex II, Section VII, pt 9 (EC) 853/2004)



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**Intermediary operators may receive live bivalve molluscs from production areas classified as A, B or C, from relaying areas or from other intermediary operators.**

**Intermediary operators can send live bivalve molluscs:**

- (a) from class A production areas to dispatch centres or another intermediary operator;**
- (b) from class B production areas only to purification centres, processing establishments or to another intermediary operator;**
- (c) from class C production areas to processing establishments or to another intermediary operator with premise**

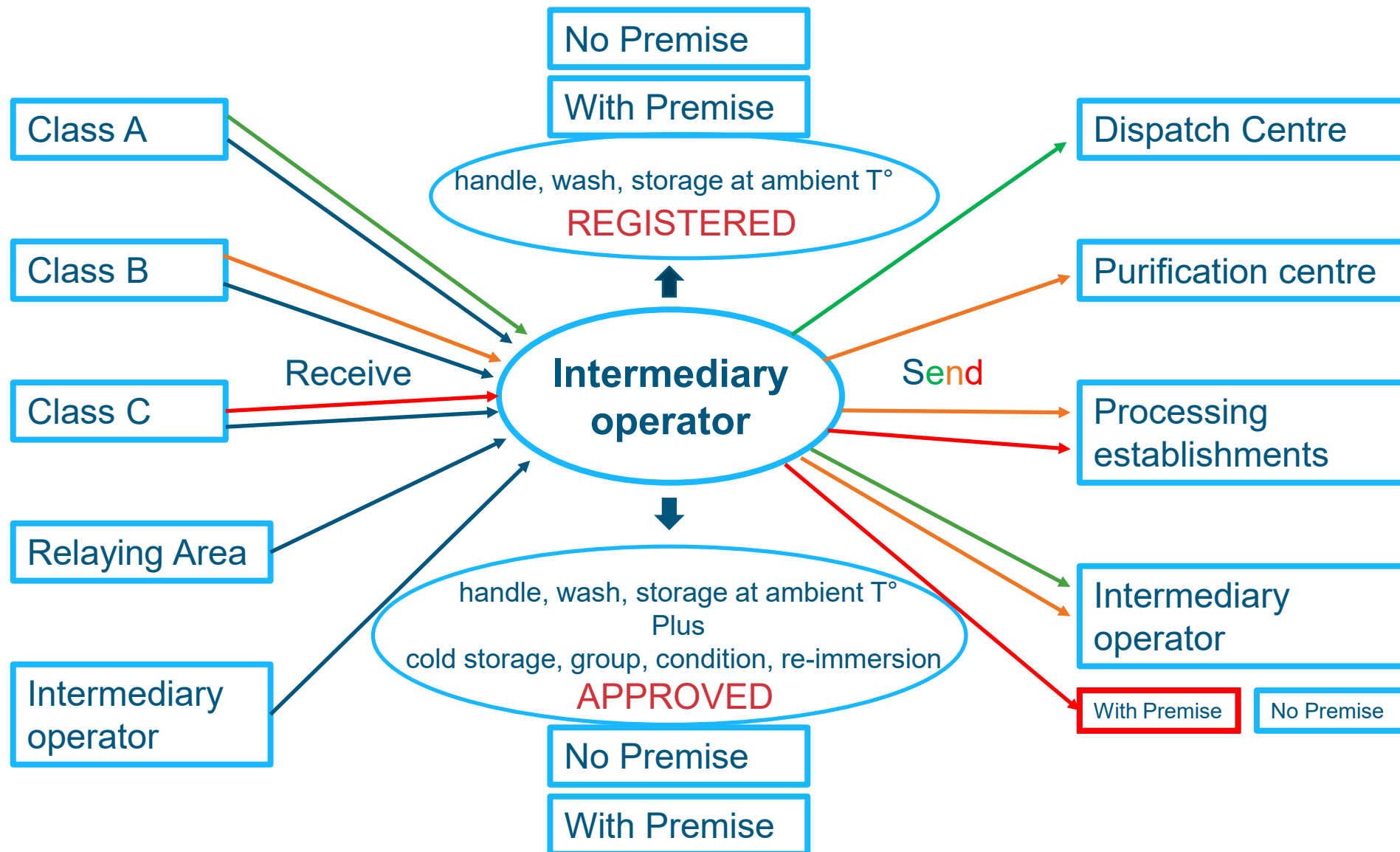
# Intermediary Operators

(Annex II, Section VII, pt 9 (EC) 853/2004)



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# Intermediary Operators

(Annex II, Section VII, pt4 (d) (EC) 853/2004)



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**Where a batch of live bivalve molluscs is sent by an intermediary operator:**

- a new registration document, filled-in by the intermediary operator, must accompany the batch
- Information as required from original SRDs
- the name and address of the intermediary operator;
- Information relating to any “conditioning” or re-immersion\* (start and end dates, location, confirmation of location status or establishment status)
- Information relating to any “grouping” of species (start and end dates, area status and batch status)

*\*re-immersion shall not cause additional contamination to the live bivalve molluscs.*

# Difference Ver 5 / Ver 6

Serial No. IE 200001(6 digit)

## SHELLFISH REGISTRATION DOCUMENT

DATE OF HARVEST: <sup>(a)</sup>	PRODUCTION AREA HARVESTED: <sup>(b)</sup>	HARVEST LOCATION CODE: <sup>(c)</sup>
BIOTOXIN STATUS: <sup>(d)</sup>	WEEK NUMBER: <sup>(e)</sup>	PREVIOUS TEST STATUS: <sup>(f)</sup>
CLASSIFICATION OF PRODUCTION AREA: <sup>(g)</sup>	A	B
NAME AND REGISTRATION OF VESSEL (if applicable): <sup>(h)</sup>		
EU LOGSHEET NUMBER (if applicable, vessels > 10m):	ICES AREA: <sup>(i)</sup>	ICES Statistical Rectangle <sup>(j)</sup>
FISHING START TIME	END OF FISHING TIME	LANDING PORT
DREDGE TYPE <sup>(k)</sup>	NO. OF DREDGES	DREDGE WIDTH (cm)

SHELLFISH SPECIES HARVESTED: <sup>(l)</sup>		
COMMON NAME	SCIENTIFIC NAME	QUANTITIES HARVESTED (Kg)

DESTINATION OF SHELLFISH HARVESTED: <sup>(m)</sup> (Name, Address in Block Capitals)	Destination 1:	Destination 2: (If applicable)
A Class required additional treatment <sup>(n)</sup>		

GATHERER'S NAME: <sup>(o)</sup> (Block Capitals)	
GATHERER'S ADDRESS: <sup>(p)</sup> (Block Capitals)	
TELEPHONE NUMBER: <sup>(q)</sup>	
Signature: <sup>(r)</sup>	
Date: <sup>(s)</sup>	
Company Date Stamp: <sup>(t)</sup>	
To be stamped on receipt by the dispatch or purification centre / processing plant	

This sheet must accompany each batch of shellfish harvested and a copy be retained for inspection in the document book for a minimum of three years from the date of harvest.

According to requirements of EU Food Hygiene Regulations  
Sea-Fisheries Protection Authority Ireland +353 (0) 23 8859300 [www.sfpai.ie](http://www.sfpai.ie)

## SHELLFISH REGISTRATION DOCUMENT

Serial No. IE

DATE OF HARVEST: <sup>(a)</sup>	PRODUCTION AREA HARVESTED: <sup>(b)</sup>	HARVEST LOCATION CODE: <sup>(c)</sup>
CLASSIFICATION OF PRODUCTION AREA: <sup>(d)</sup>	A	B
BIOTOXIN STATUS: <sup>(e)</sup>	WEEK NUMBER: <sup>(f)</sup>	PREVIOUS TEST STATUS: <sup>(g)</sup>
NAME AND REGISTRATION OF VESSEL (if applicable): <sup>(h)</sup>		
EU LOGSHEET NUMBER (if applicable, vessels > 10m):	ICES AREA: <sup>(i)</sup>	ICES Statistical Rectangle <sup>(j)</sup>
SHELLFISH SPECIES HARVESTED: <sup>(l)</sup> Aquaculture <input type="checkbox"/> or Natural Banks <input type="checkbox"/>		
COMMON NAME	SCIENTIFIC NAME	QUANTITIES HARVESTED (Kg)
Type of packaging (bags, bulk etc.):	Batch no.:	
DESTINATION OF SHELLFISH HARVESTED:		INTERMEDIARY OPERATOR (if applicable) <sup>(k)</sup>
Purification / dispatch centre / auction hall / processing establishment or intermediary operator <sup>(l)</sup> (indicate the appropriate activity)		
Name:	Name:	
Address:	Address:	
Country:	Country:	
Registration or Approval No:	Registration or Approval No:	
Activity:	Activity:	
Purification (if applicable) <sup>(m)</sup>	From Intermediary operator (if applicable)	
Duration of purification:	Date of arrival:	
Date of entry:	Date of exit:	
Date of exit:	A Class required additional treatment: <sup>(n)</sup>	
INTERMEDIARY OPERATOR SECTION (if applicable) <sup>(o)</sup>		
Conditioning Yes <input type="checkbox"/> No <input type="checkbox"/>	Re-immersion Yes <input type="checkbox"/> No <input type="checkbox"/>	Grouping Yes <input type="checkbox"/> No <input type="checkbox"/>
Location:	Location:	Date of starting:
Date of starting:	Date of starting:	Date of end:
Date of end:	Date of end:	
Reference the original gatherers Serial No. IE (6 digit): <sup>(p)</sup>		
GATHERER / SUPPLIER OF SHELLFISH <sup>(q)</sup>		Company Date Stamp: <sup>(r)</sup>
Name:		
Address:		
Country:		
Telephone number: <sup>(s)</sup>		
Registration or Approval No:		
Declaration of the gatherer/ supplier <sup>(t)</sup>		Signature:
Declaration of the receiving food business operator <sup>(u)</sup>		Signature:

This sheet must accompany each batch of shellfish harvested and a copy be retained for inspection in the document book for a minimum of three years from the date of harvest. According to requirements of EU Food Hygiene Regulations Sea-Fisheries Protection Authority Ireland +353 (0) 23 8859300 [www.sfpai.ie](http://www.sfpai.ie)

# Final Destination of SRD

(Annex II, Section VII, Ch. VII (EC) 853/2004)



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	Primary Producer	Intermediary Operator	Dispatch Centre without Purification	Combined Purification Centre and Dispatch Centre
Legal Status	Registered to grow and harvest LBM's.	Registered or Approved depending on activities	Approved to dispatch LBM's for direct human consumption	Approved to dispatch oysters for direct human consumption following purification
Obligatory Documentary requirements for LBM's produced	Shellfish Registration Document showing Classification and Biotoxin status of production area.	New Shellfish Registration Document with original primary producer information showing Classification and Biotoxin status of production area and additional Intermediary operator information and activities.	Label and Commercial documentation with Identification Mark showing approval number. i.e. Oval Mark	Label and Commercial documentation with Identification Mark showing approval number. i.e. Oval Mark
Some Obligatory Food Safety Requirements	General Hygiene, Annex I of 852/2004. Only Harvest from Classified Production Areas (CPAs). Only harvest from biotoxin-open areas. Registration as FBO	Reg 853/2004 Annex III Chapter 1 point 4 (d) Comm Del Reg 2021/1374 Chapter X Model 1.8 From Intermediary operator. Registered or approved depending on activities Reg 853/2004 Annex III Chapter 1 point 8	General Hygiene Annex II 852/2004. Structures and systems to comply with specifics of Annex III Section VII 853/2004. Food Safety Procedures based on HACCP principles. Approval of establishment.	General Hygiene Annex II 852/2004. Structures and systems Annex III Section VII 853/2004. Food Safety Procedures based on HACCP principles. Approval of establishment.

*This SRD sheet must accompany each batch of shellfish harvested and a copy be retained for inspection in the document book for a minimum of **three years** from the date of harvest.*

# Thank you

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**King Scallops**  
*Pectan maximus*



**Blue mussels**  
*Mytilus Edulis*



**Pacific Oyster**  
*Crassostrea Gigas*



**Queen Scallops**  
*Aequipecten  
opercularis*



**Surf Clams**  
*Spisula Solida*



**Razor Clams**  
*Ensis sp.*

