

A GUIDE FOR MOBILE FISHMONGERS



This guidance note provides advice to mobile fishmongers (also known as fish vans) on the steps you should take to make sure you meet all the relevant requirements that apply to food businesses.

The guidance is relevant if you are buying seafood products from auctions, merchants, or directly from vessels on the quayside and then selling the product to customers. It covers what you need to do to register as a new business; to ensure you meet food safety requirements around food hygiene, product storage, labelling; and to adhere to waste management requirements. Guidance on additional measures relating to COVID-19 is also provided.







For more information on any of the topics featured in this guide please contact: regulation@seafish.co.uk

REGISTRATION OF BUYERS AND SELLERS

All buyers and sellers must follow government [guidance for buyers and sellers of first-sale fish](#). The aim of this legislation is to help combat the landing of illegally caught fish from European waters.

You **need** to register as a buyer if you buy fish directly from a fishing vessel to sell on to other buyers (i.e. the fish is not for personal consumption). You **do not need** to register as a buyer if you are buying fish direct from a designated auction site, although you must register as a seller if you sell fish at a designated auction site. Fish purchased from a fish merchant or a wholesaler is likely exempt because the buyer and seller requirements will have already have been met.

As a registered buyer and seller of fish you must:

-  Ensure fish is weighed prior to first sale and maintain appropriate records;
-  Keep a record of each sale of fish for three years;
-  Make records available for inspection at the notified location;
-  Complete and submit a sales note to the competent authority for each transaction;
-  Submit sales notes electronically (e-sales) where turnover exceeds 200k euros, and;
-  Comply with requirements for the traceability of fish which includes transport, weighing and labelling of fish.

More information on buyers and sellers legislation can be found in the Seafish [guide to buyers and sellers](#).





FOOD SAFETY REQUIREMENTS

There are some things you must do to ensure your fish van meets food safety requirements. These relate to food hygiene, keeping food at the right temperature, making sure you label your products correctly, and keeping the food storage area in your van clean and tidy.

HYGIENE

You must operate your mobile fish van in a way that protects your customers and complies with food safety laws. Hygiene is very important and you must:


- ✓ Wash your hands regularly – particularly before you start work; prior to selling ready to eat items; after eating, drinking or smoking; after using the toilet; and after cleaning the workspace. You should have adequate potable water to do this;
- ✓ Wear clean overclothing – where necessary this should include a hat or hairnet;
- ✓ Do not wear watches or jewellery that could present a contamination risk. Plain jewellery such as wedding bands are acceptable;
- ✓ Ensure the consumption of food and drink is kept separate from your raw and cooked seafood products;
- ✓ You and any other food handlers should not handle food if suffering any symptoms of food poisoning, including vomiting and diarrhoea, until 48 hours after the symptoms end;
- ✓ Stay alert to any potential sources of contamination in your workspace. This includes elastic bands, paperclips and stationary items.

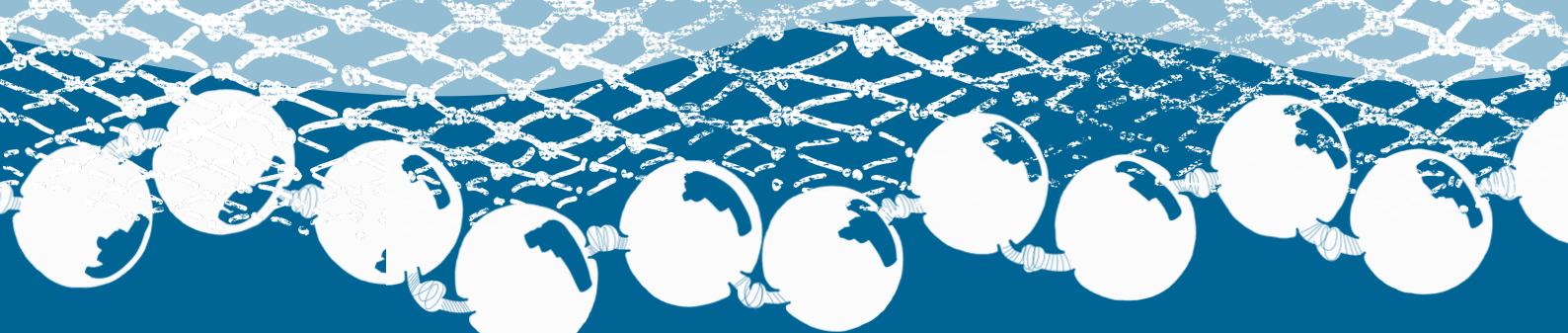
REGISTERING A NEW BUSINESS

Mobile fishmongers are classed as a food business so you must follow the Food Standards Agency (FSA) and Food Standards Scotland (FSS) advice [on registering a new food business](#). You should register a new food business with your local authority as soon as possible. To find the relevant local authority for your business use the government's [food business registration page](#).



One high-risk area for mobile fishmongers is cross-contamination between raw products (wet fish, live shellfish) and cooked products (ready-to-eat smoked fish, dressed crab, cooked prawns). To minimise this risk you should always:

- ✓ Keep raw and cooked products separate at all times;
 - ✓ Use different weighing scales, utensils and surfaces for preparation of raw and cooked products wherever possible, or clean surfaces with a disinfectant between transactions;
 - ✓ Thoroughly wash your hands between handling raw and cooked products or, if you wear gloves, change gloves between handling products; and,
 - ✓ Serve pre-wrapped cooked items whenever possible.
- 



ADDITIONAL HYGIENE MEASURES RELATED TO COVID-19 (CORONAVIRUS):

COVID-19, also known as coronavirus, is a respiratory illness spread via droplets released by coughing or sneezing. Although the virus is not known to be transmitted by food or food packaging, as a matter of good practice you should wash your hands regularly, with soap and water, for a minimum of 20 seconds.

Traders should:

- ✓ Continue to follow the FSA [guidance on good hygiene practice](#)
- ✓ Follow government [advice on cleaning and hygiene practices](#)
- ✓ Keep monitoring the [government response to coronavirus](#) for further updates

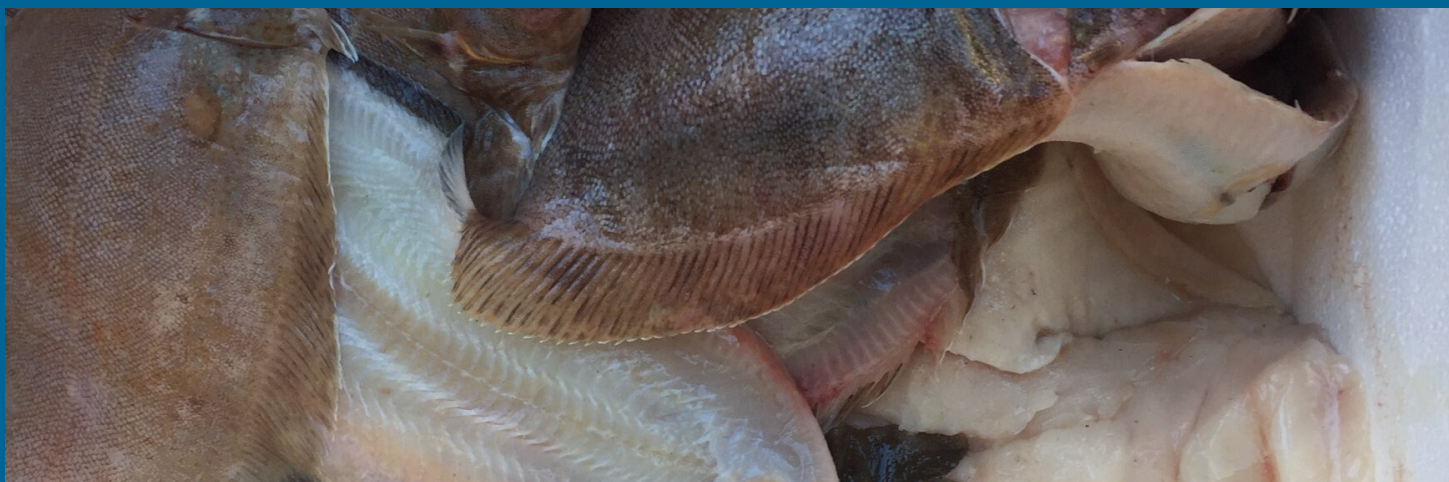
Anyone who handles food and displays symptoms of coronavirus should not be at work; they should stay at home for a minimum of 14 days and follow the government's [advice on self-isolation](#) to prevent further spread of the virus.

CLEANING YOUR FISH VAN WORKSPACE

Keeping your mobile fish van clean is a legal requirement. A clean workspace also presents a professional and hygienic image to your customers.

The ideal chemical for cleaning a fishmonger's workspace is a food-safe disinfectant: this combines the effect of a detergent with antibacterial properties. The FSA recommends choosing a disinfectant that complies with [BS EN1276:2019](#) for normal food hygiene, and given current Covid-19 concerns you should also consider using a product capable of inactivating viruses which complies with [BS EN 14476](#). Avoid using traditional disinfectants and bleach as they can easily contaminate (taint) the taste and smell of fish products.

You should keep the workspace clean and tidy during the day and you should give the van a thorough clean before and after your daily round.



TEMPERATURE CONTROL

Keeping seafood products at an appropriate temperature is vital to ensure freshness and quality, extend shelf-life, and comply with legal requirements.

You should:

- ✓ Use a probe thermometer to monitor the temperature of products throughout the day, from the point of receipt to the point of sale;
- ✓ Record temperatures periodically throughout the day. This is good practice and provides you with robust defence in the event of complaints;
- ✓ Advise customers how to store their fish. Product should be kept cold until it is ready to be cooked;
- ✓ Consider fitting your vehicle with insulation to keep products cold and minimise the operating costs of refrigeration and/or ice production;
- ✓ Plan ahead: ensure your cool storage system can cope with unexpected events such as heat waves and traffic jams;
- ✓ If you are in any doubt, **check the temperature of your products** - they must always remain within safe and legal limits; and,
- ✓ Responsibly dispose of any products that have exceeded legal temperatures limits (see 'Litter and waste management').

Fresh fish products

e.g. fillets

Display products partially covered by clean ice.

Fresh fishery products must be chilled at a temperature approaching that of melting ice i.e. as close as possible to 0 °C.

At the end of the day, store products by completely covering them in fresh ice.

Wrap fresh tuna and mackerel when putting products on ice, this will help preserve their appearance.

Live shellfish

e.g. mussels, oysters, clams

Store live products between 4-8°C.

Ensure all shellfish are alive at the point of sale (shells should close when tapped and any damaged shells should be responsibly disposed of).

Do not store live bivalve molluscs (mussels, oysters, clams) submerged in water or in ice.

Store live shellfish away from fresh or cooked products to prevent cross-contamination.

Frozen and defrosting products

e.g. fillets and scallops

Store frozen products at or below -18°C.

Defrosting products can only be sold on that day only. You should explain to customers that they should not be refrozen (defrosted raw fish can be refrozen if it is first cooked or smoked).

Cooked products

e.g. crabs, fishcakes, hot smoked fish, cooked prawns

Store cooked products at or below 8°C.

If these products are to be stored on ice, ensure there is absolutely no risk of cross-contamination with fresh fish.



LABELLING YOUR PRODUCTS

This section aims to help you navigate the labelling requirement to ensure you are compliant with legislation. To facilitate food sales during the coronavirus epidemic some labelling rules may be relaxed. Please check back regularly for updates.

The following guidance applies to fresh fish and cold smoked fish only; processed and packaged fish are subject to different legislation and should be labelled by your supplier.

All fresh fish products must indicate:

- ✓ The common name e.g. Haddock
- ✓ The scientific name of the fish e.g. *Melanogrammus aeglefinus*
- ✓ The production method e.g. "Caught" or "Farmed"
- ✓ The method of capture e.g. trawl, line caught etc.
- ✓ The catch area e.g. North Sea (name of sub-area or division)
- ✓ If the product has previously been frozen, this must be communicated to your customer
- ✓ Data of minimum durability where appropriate e.g. use by date

This information can be provided via product labels, billboards or posters.

Do not speculate on labelling. Unless you have received specific assurances about the provenance of your fish products, you should not add these details. Doing so incorrectly could be considered as misleading your customers.

Some products may have other customer-facing accreditations which can be added to your labelling, for example Protected Geographical Indication (PGI) such as Cornish Sardines. Such accreditations can only be used on products from accredited producers or fisheries.

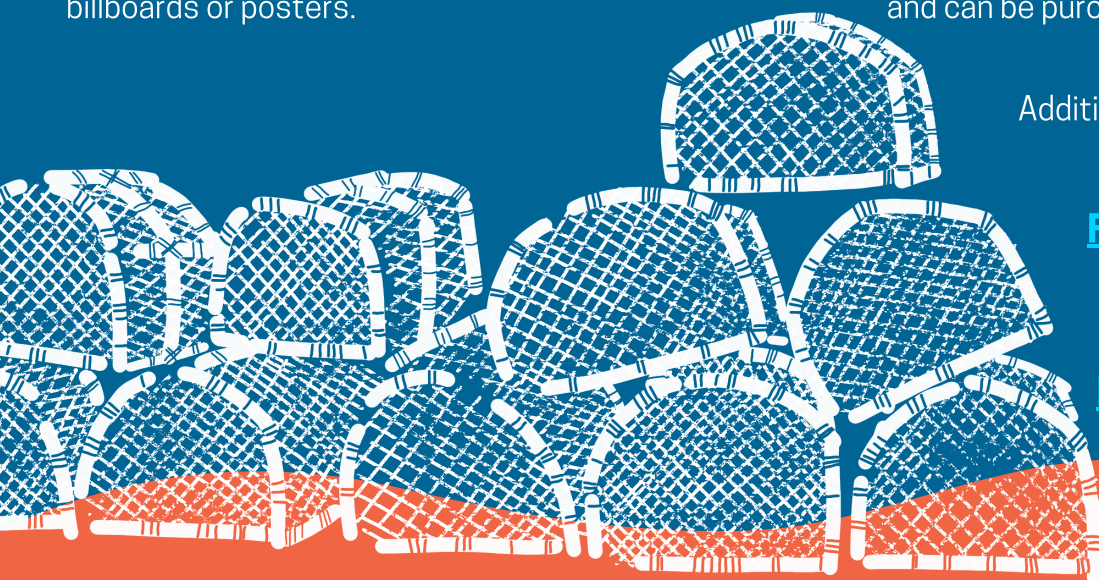
Live bivalve shellfish (mussels, clams, oysters etc.) must be sourced from an approved dispatch centre as there are additional food safety measures that must be met before you can sell these products. You must not buy live bivalve shellfish direct from a fishing vessel unless it is approved to do so. Scallops must always be sourced from an approved establishment and never directly from the vessel or quayside. Animals from a dispatch centre must be sold with a label detailing their origin, date of processing and batch details - this is a legal requirement. If you receive live shellfish from a supplier without a label carrying these details you should reject them and inform your local Environmental Health Department immediately. You must keep this label for 60 days; this ensures traceability if there are any instances of food poisoning.

Live crustacean shellfish (crabs, lobsters, langoustines etc) are not subject to these controls and can be purchased directly from a vessel or fish merchant.

Additional information on food safety requirements can be found at:

[**Food Standards Agency**](#) in
England, Wales and
Northern Ireland

[**Food Standards Scotland**](#)
in Scotland





IDENTIFYING FISH FRESHNESS

When sourcing product there are things you should look out for to help you make sure you are buying the freshest seafood.

1 EYES

On a whole fish the eyes should be clear and bulge out a little, they should not be milky/cloudy and sunken in.

2 FIRMNESS

Fish should be firm to the touch, not soft and slimy. If you press a fish's skin/flesh it should immediately bounce back.

3 COLOUR

If the fish still has its gills these should be bright red and not brownish or discoloured. Likewise, if the fish has been gutted, any traces of blood in the gut cavity or along the backbone should also be red.

4 SKIN

Look for firm, shiny flesh; any surface slime should be clear and not white.

5 SMELL

Fresh whole fish and fillets should be odourless, or smell of the sea. They should not smell unpleasant.

6 TEMPERATURE

Fish and fillets should be cold to the touch which is a sign that they have been chilled correctly to maintain freshness.

For more information on seafood freshness please check out Seafish's factsheet [here](#).

LITTER AND WASTE MANAGEMENT

Seafood sales generate packaging and food waste. Seafood waste is classed as a category 3 animal by-product, which means it must be responsibly disposed of according to government guidelines. Follow this link for more information on [animal by-product categories, hygiene and disposal](#). In Northern Ireland DAERA produce [animal by-products general guidance](#).

You are required by law to safely contain and responsibly dispose of food waste at an approved site and you will be penalised if you do not dispose of it correctly. Contact your local authority for information about how to responsibly dispose of food waste in your area.

During all trading and transit, waste should be stored away from products for sale. Under no circumstances can you do the following:

Action

Put business waste in your domestic waste bin at home

Put your waste near or around public waste and litter bins

Fly tip your waste

Put your waste in another trader's bin without permission

You are committing an offence if you give your waste to anyone who is not licensed to carry and dispose of controlled waste.

Penalty

It is an offence to take home and place it in your domestic bin, or take to a household waste recycling centre. Contact your local authority for information on disposing of business waste.

On-the-spot fine of £80, increasing to a maximum of £2,500 for persistent littering.

Fine of up to £50,000 or 12 months in prison.

£300 fixed penalty notice or prosecution with a £5,000 fine.

£400 fixed penalty notice or prosecution with an unlimited fine.

In some cases it may be possible to reach an agreement with another business to use their waste disposal facilities. Such agreements should be formalised through a joint written contract.

For more information refer to:

- Environment Agency's [Waste duty of care: code of practice](#) in England and Wales
- SEPA's [Zero waste guidance on duty of care](#) in Scotland
- Daera's [Waste Management The Duty of Care - A Code of Practice](#) in Northern Ireland