



Inland and Lake Superior Fish

Chippewa Traditional Food Regulatory System Project

Fish and the Ojibwe People

The Ojibwe have always lived on and around waters abundant with fish. Historically fish has been, and today continues to be, an essential component of the Ojibwe diet. Traditional feasts often feature fish dishes and stories are told of the relationship between humans and fish. Fish are also considered relatives to the Ojibwe people and at least one clan comes from the fish people (name or sturgeon).

The Purpose of the Model Food Code

The Model Food Code aims to provide a general regulatory framework under which the 11 GLIFWC member tribes can develop food regulatory systems for the commercialization of value-added wild harvested foods. The integration of Model Food Code chapters into existing tribal community food structures will enable tribal members to safely engage in commercial activities based around traditional hunting, fishing, and gathering practices (Sec. 1.01 [Purpose]). Model Food Code provisions apply to treaty-harvested food products intended for sale by vendors to individual tribal members, organizations and institutions for which a majority of the consumers served are tribal members, and a general consumer base which includes non-tribal members and retail institutions (Sec. 2.01 [Definitions]). The Model Food Code does not apply to informal commercial sales within reservation boundaries, home use of treaty-harvested food products, community feasts, or the sale of whole deer and elk carcasses pursuant to tribes' applicable off-reservation conservation codes (Sec. 1.02 [Applicability]).

Fish Processing in the Model Food Code

The processing of treaty-harvested fish is primarily regulated in Chapter 6 of the GLIFWC Chippewa Ceded Territory Traditional Model Code (Model Code). A summary of the provisions:

- A license issued by a tribal food regulatory authority is required to engage in the processing of treaty-harvested fish for commercial sale or donation to a tribal program.
- Fish products are regulated by the relative food safety risk posed by the product and how the product is sold. Class 1 licenses limited to lower risk fish products and the class 1 food processing regulations are less stringent. Class 1 fish products may be sold on reservation to tribal members. Class 2 and 3 licenses providing the opportunity to produce more complex products with higher levels of regulation. Class 2 and 3 products are for sales to tribal programs and general retail sale, respectively.

Fish Processing in the Model Food Code, cont.

- All producers will be required to retain documentation of the condition of the fish prior to being processed or received by a fish processing plant (i.e. temperature of fish, time after harvest, held within a climate-controlled environment or in contact with ice, etc.). All fish processing is required to be conducted in clean environments, using equipment and surfaces that have been cleaned and sterilized, and by individuals who are adequately trained. Successful completion of a Fish HACCP program is required for entities and vendors producing processed fish for sale and donation.
- Class 1 sales are limited to fresh filets and fresh whole, gutted fish. Class 1 fish processing may occur outside of a licensed food processing plant and within home facility (e.g. home, community kitchen, etc.) that has been inspected by the tribal food regulatory authority. Class 1 fish products are exempt from most labeling requirements, however the food processor is required to be truthful in any statements about the products. Class 1 fish products may only be sold direct to tribal consumers by the processor.
- Class 2 sales include fresh filets, fresh whole, gutted fish and vacuum-packed frozen filets. Vacuum-packed fish filets are a higher risk product due to their storage within an anaerobic environment and potential to support botulism. Class 2 fish processing may only occur within a tribally-licensed food processing plant; class 2 products have standard retail labeling. Class 2 fish products may be sold direct to tribal consumers and to tribal programs.
- Class 3 products include fresh filets, fresh and whole, gutted fish, vacuum-packed frozen filets, smoked fish and roe. Strict time and temperature controls are necessary for the safe processing and storage of smoked fish and roe. Class 3 fish products must be processed within a tribally-licensed food processing plant and are labeled with standard retail labeling. Class 3 fish products may be sold in tribally-licensed retail food establishments, and other locations, for sale to anyone.

FOR INFORMATIONAL PURPOSES ONLY. MODEL CODE PROVISIONS DO NOT APPLY UNLESS ADOPTED BY A TRIBAL GOVERNMENT



For more information about the Chippewa Ceded Territory Traditional Food Regulatory Systems Project, please contact Latisha Coffin, ANA SEDS Coordinator, at (715) 682-6619 or lcoffin@glifwc.org.