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Food Safety and Transportation

October 11th, 2019

Poison control centers receive thousands of calls about suspected food poisoning each year. As the holiday seasons approach, it can be especially risky as people head to the grocery stores to prepare special meals for their loved ones. Although 14% of Americans get food poisoning each year, let's face it… we all, as consumers, purchase our food with the assumption that what we prepare is not going to lead to illness and death.

Compliance requirements identified from the Food Safety Modernization Act (FMSA) require a food producer or processor to perform an analysis just like the Hazard Analysis and Critical Control Point (HACCP) used by the commercial food industry to prevent the spread of food-borne pathogens. From the moment food products are placed into the staging area on the shipping dock until they are unloaded at the receiving dock and stored; that entire process and all aspects of it now require the following to be written into a food safety plan to be in compliance with FDA/DOT regulations:

- Hazard Analysis
- Preventive Controls
- Sanitation
- Monitoring
- Verification
- Recordkeeping
- Corrective Actions

UPCOMING EVENTS

Register Now to Attend an Idealease/NPTC Safety Seminar this Fall!

Join us at a safety seminar in August, September or October to hear the latest updates on regulations and compliance.

Click Here to Sign Up for a seminar near you!

FSMA and the Sanitary Transportation of Human and Animal Food

Food safety is not new; back in 1990 Congress passed the Sanitary Food Transportation Act (SFTA) and delegated primary authority to implement the law to the Department of Transportation (DOT). With the passage of the 2005 SFTA, Congress reallocated authority for food transportation safety to the FDA, DOT, and U.S. Department of Agriculture (USDA). The FDA now has the lead role among federal agencies in regulating the safety of food during transport. However, both the DOT and USDA have a role as partners with the FDA in the broad federal food safety structure.

The FSMA establishes requirements for vehicles and transportation equipment, transportation operations, training, and recordkeeping. For example, prior to loading food that is not completely enclosed by its container, loaders are required to determine that a vehicle is in appropriate sanitary condition for the transport of the food, e.g., it is in adequate physical condition, and free of visible evidence of pest infestation and previous cargo that could cause the food to become unsafe during transportation. Operators of motor vehicles, railcars, and other equipment used in food transportation would be required to establish written procedures, subject to record-keeping requirements, for cleaning and inspecting their vehicles and transportation equipment.

Key Requirements of the Regulation

- **Vehicles and transportation equipment:** The design and maintenance of vehicles and transportation equipment to ensure that it does not cause the food that it transports to become unsafe. For example, they must be suitable and adequately cleanable for their intended use and capable of maintaining temperatures necessary for the safe transport of food.
- **Transportation operations:** The measures taken during transportation to ensure food safety, such as adequate temperature controls, preventing contamination of ready to eat food from touching raw food, protection of food from contamination by non-food items in the same load or previous load, and protection of food from cross-contact, i.e., the unintentional incorporation of a food allergen.
- **Training:** Training of carrier personnel in sanitary transportation practices and documentation of the training. This training is required when the carrier and shipper agree that the carrier is responsible for sanitary conditions during transport.
- **Records:** Maintenance of records of written procedures, agreements and training (required of carriers). The required retention time for these records depends upon the type of record and when the covered activity occurred but does not exceed 12 months.

Exemptions from the Regulation

- Shippers, receivers, or carriers engaged in

Idealease and the National Private Truck Council NPTC will again be hosting safety seminars in 2019. The one-day seminar this year will focus on new safety technologies available on trucks today, basic safety and compliance, regulation changes and CSA. The seminars and will be provided to all Idealease customers, potential customers and NPTC members at no charge.

The seminar provides important information applicable for both the novice and experienced transportation professionals.

FALL SEMINARS

10/15/2019	Reno, NV
10/22/2019	Salt Lake City, UT
10/23/2019	Lexington, KY
10/23/2019	Modesto/Turlock, CA

Click Here to register **your employees for the Safety Bulletin; you can even view the archives of past bulletins here!**

Sign Up for the *Elevate Your Driver's Performance* Question/Tip of the Week

You'll receive short weekly questions/tips to keep your team striving for Excellence behind the wheel, covering

food transportation operations that have less than $500,000 in average annual revenue
- Transportation activities performed by a farm
- Transportation of food that is transported through the United States to another country
- Transportation of food that is imported for future export and that is neither consumed nor distributed in the United States
- Transportation of compressed food gases (e.g. carbon dioxide, nitrogen or oxygen authorized for use in food and beverage products)
- Transportation of human food byproducts transported for use as animal food without further processing
- Transportation of food that is completely enclosed by a container except a food that requires temperature control for safety
- Transportation of live food animals, except molluscan shellfish

How to Ensure a Clean Temperature-controlled Compartment

At the end of each day, select an area free of environmental concerns for cleaning the inside of the trailer/truck body. Start by opening the doors of the refrigerated compartment and removing any items that should not get wet. Sweep out debris or blow out the compartment with an air hose after carefully clearing any and all debris (paper, plastic wrap) from the compartment and inspecting the evaporator housing to remove any debris.

When needed…

1. Prepare a bucket of *food-grade detergent* and water.
2. Scrub all interior surfaces with a clean cloth and detergent/water mix.
3. Use a water hose to spray the inside compartment. Make sure to spray the ceiling and walls as well as the floor. Give special attention to cracks, crevices, and areas near door openings and pockets. All cleaning should follow a "top first, bottom last" approach.
4. Allow the inside compartment to air dry.
5. Shut doors and/or take other steps, as necessary, to keep your vehicle clean. Always ensure no debris is left in the compartment at the end of your day.
6. When dirty, wash the outside of the truck.

How to Manage Risk with the Transport of Human and Animal Food

1. **Proper packaging is essential.** Packaging should be crush-proof, have solid sides for frozen products and vented sides for fresh products.
2. **Pre-cool and store cargo at desired temperature to remove heat.** Confirm product is at desired temperature before loading. Refrigeration units are designed to maintained temperature, not change it.
3. **Run reefer unit 20 minutes in "high speed cool."** To remove residual trailer/body heat. Perform an automatic "pre-trip" to confirm proper unit operation. Unit MUST pass test. If auto pre-trip fails; follow your company's prescribed

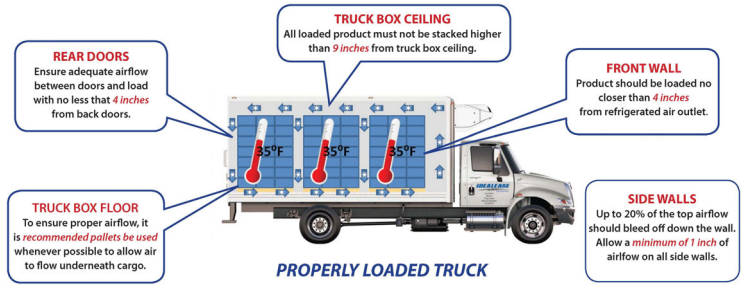
(but not limited to) the various following topics:

- Key Performance Indicators (KPIs)
- Safety
- Scorecarding
- Driver performance
- Motivation
- Incentives

procedures or contact your maintenance provider for repair.

4. **Set unit controller to the desired temperature.** Verify the setting after changing it to confirm that it is correct.
5. **Verify correct mode of operation.** Frozen products are typically transported in auto-stop-start (Cycle-Sentry) to conserve fuel. But this setting can reduce the shelf life or ruin an entire load of produce like fresh fruits and vegetables. For these products, it is recommended to operate the unit in "Continuous Run."
6. **Pre-cool trailer/truck body.** Operate the unit to desired temperature to remove residual heat.
7. **Turn unit "OFF" while loading.** To minimize heat & humidity entering the trailer/truck body and verify product is at the proper temperature.
8. **Load product quickly and efficiently.** Provide adequate air circulation around and through entire load.
9. **Close the doors and start the unit.** Re-confirm Continuous Run or Auto-start-stop operating modes and temperature setpoint are correct. When compartment temperature is below 40°F, initiate a defrost cycle. This will help clear the evaporator coil and ensure maximum cooling performance.
10. **Strip curtains.** Are always recommended in distribution of temperature-controlled product. Keeping conditioned air in and outside air out.
11. **Door openings.** Minimize the number of door openings and their duration. Ambient air migrates in and trailer/body air migrates out.
12. **Proper airflow is CRITICAL.** Poor air distribution causes product deterioration, even with adequate unit capacity. Obstructions cause poor air flow and product hot spots. Proper air circulation is allowed unobstructed paths on all 6 sides of a load.

The 4 Key Factors of Suitable Airflow



1. **Use three-way block pallets to help provide adequate airflow.** Do not obstruct the floor under the cargo. It prevents air from returning to the unit. Slip sheets and had stacking are not optimal for temperature management.
2. **Inside of the trailer/body must be clean to prevent contamination:**
   - T-floor must be free of obstructions
   - Debris can block air circulation
   - Debris can be pulled into the unit, resulting in insufficient cooling
   - Use loading patterns that provide adequate airspace.
3. **Exercise caution!** Provide adequate space between the top of the cargo and the ceiling. Products should be loaded evenly to avoid air flow restrictions.
4. **Do not block the unit evaporator air inlet (return air).** Do not load product tight against the unit, walls or doors.

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