

# **Refrigerated Transportation Best Practices Guide**

Advancing the Sanitary Transportation of Human and Animal Food



**International Refrigerated Transportation Association** 





# **Acknowledgements**

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#### Introduction

In April 2016, the Food and Drug Administration (FDA) published its <u>final rule for the Sanitary Transportation of Human and Animal Food (STF)</u>. The rule, which became effective on June 6, 2016, established requirements for **shippers**, **loaders**, **carriers by motor or rail vehicle and receivers** involved in transporting human and animal food to use documented sanitary practices to ensure the safety of that food. This action was part of the FDA's larger effort – and requirement -- to focus on prevention of food safety problems throughout the food chain, and is part of their implementation of the Sanitary Food Transportation Act of 2005 (2005 SFTA) and the Food Safety Modernization Act of 2011 (FSMA).

The ruling, which had been under review since January 2013 and included an important public comment period, is one of seven foundational rules aimed at creating a modern, risk-based framework for food safety. The goal of the final STF is to prevent practices during transportation that create food safety risks, such as failure to properly refrigerate food, inadequate cleaning of vehicles between loads, and failure to properly protect food.

# Why a Refrigerated Transportation Best Practice Guide?

The STF ruling identifies shippers as the primary responsible holder when it comes to determining appropriate standards for sanitary transportation of food products. The FDA defines shippers as a person who initiates a shipment of food by motor vehicle or rail vehicle. However, carriers, loaders and receivers must also abide by the STF ruling, agree to designated shipper requirements, and perform as expected and per shipper requirements.

In other words, many in our industry will be affected by the FDA's STF ruling, and we are all responsible for being educated and prepared to meet the resulting requirements. Ultimately, we are all responsible for food safety and the sanitary transportation of food.

The International Refrigerated Transportation Association (IRTA), a core partner of the Global Cold Chain Alliance (GCCA), decided to create this *Refrigerated Transportation Best Practice Guide* to assist shippers in understanding and preparing qualified – and attainable – food safety plans and transportation requirements, and offering carriers, loaders and receivers a clearer understanding of expected practices so that they can be prepared to deliver.

While impossible to be all-encompassing, the goal of this *Best Practices Guide*, as prepared by the IRTA, GCCA, and a task force of diverse industry experts from transportation, academia, warehousing and industry suppliers, is to help all GCCA members in their efforts to meet or exceed the STF rulings, ensure ongoing food safety throughout our industry, and positively impact the sanitary transportation of food to consumers.

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#### **About IRTA**

The International Refrigerated Transportation Association (IRTA) decided to create this *Refrigerated Transportation Best Practice Guide* to assist shippers in understanding and preparing qualified — and attainable — food safety plans and transportation requirements, and offering carriers, loaders and receivers a clearer understanding of expected practices so that they can be prepared to deliver.



While impossible to be all encompassing, the goal of this *Best Practices Guide* is to help all GCCA members in their efforts to meet or exceed the STF rulings, ensure ongoing food safety throughout our industry, and positively impact the sanitary transportation of food to consumers.

#### Vision

IRTA will promote and strengthen the refrigerated and transportation logistics industry.

#### **Mission**

IRTA is organized to cultivate, foster and develop commercial and trade relations between those engaged in all aspects of producing, importing, exporting, transporting, warehousing commodities requiring temperature and/or atmospheric controls and related services:

- To gather and disseminate data and information to members.
- To protect the interests of its members from unlawful and unjust measures and practices.
- To conduct activities toward promoting and strengthening the interests of those engaged in the transportation and handling of temperature and/or atmospheric controlled goods and related services.

## **History**

IRTA was established in 1994 to meet a growing demand in the transportation industry. Prior to that time, no single association existed wherein refrigerated transportation companies would have the opportunity to exchange valuable information, ideas, and insights.

# 1. STF Overview and Key Requirements

The Food Safety Modernization Act or FSMA enables United States Food and Drug Administration (FDA) to focus more on preventing food safety problems rather than relying primarily on reacting to problems after they occur. The law also provides new enforcement authorities to help achieve higher rates of compliance with risk-based, prevention-oriented safety standards and to better respond to and contain problems when they do occur. In addition, the law contains important new tools to better ensure the safety of imported foods and encourages partnerships with State, local, tribal, and territorial authorities and international collaborations with foreign regulatory counterparts. A top priority for FDA are those FSMA required regulations that provide the framework for industry's implementation of preventive controls and enhance our ability to oversee their implementation for both domestic and imported food.

The FDA's final STF rule was published in April 2016 and became effective in June 2016. It is nearly 300 pages in length. This section offers a brief summary of the key aspects and requirements. The full ruling can be found in the *Federal Register*.

# **STF Compliance Dates to Note**

- April 6, 2017 One year from rule publication date for businesses not defined as small or otherwise excluded from coverage.
- April 6, 2018 Two years from rule publication date for small businesses (defined by the FDA as businesses other than motor carriers' businesses who are not also shippers and/or receivers employing fewer than 500 persons and motor carriers having less than \$27.5 million in annual receipts).

# Who is Affected?

The STF lays out a framework of requirements for **shippers**, **carriers**, **loaders and receivers** who transport food (including food for animals) in the United States by motor or rail vehicle, whether or not the food is offered for / or enters interstate commerce. As per the FDA, the STF also applies to persons, e.g., shippers, in other countries who ship food to the United States directly by motor or rail vehicle (from Canada or Mexico), or by ship or air, and arrange for the transfer of the intact container onto a motor or rail vehicle for transportation within the U.S., if that food will be consumed or distributed in the United States.

# **Driver Training and Written Procedures**

The FDA STF final ruling requires that carriers provide awareness training to personnel engaged in transportation operations when the carrier and shipper have agreed via written contract that the carrier is responsible for the sanitary conditions during transportation operations. This includes awareness of potential food safety problems that may occur during transportation and basic sanitary transportation practices to address those problems. This training must be provided upon hiring and thereafter as necessary. Training records must be maintained for 12 months beyond when the person identified in the records stops performing the duties for which they were trained.

- Date of training
- Type of training
- Person(s) trained

# **Record Requirements for Shippers, Loaders and Carriers**

Records must be maintained 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 beyond the termination of the agreement or 12 months after the procedures stop being in use. The final rule allows offsite storage of all records, except for the written procedures required, provided that the records can be retrieved and made available to FDA within 24 hours of a request for official review.

#### **Enforcement**

The Department of Justice (DOJ) has formally announced that it has partnered with FDA and has adopted a policy of initiating criminal investigations against any company (or its employees) that sells a product that cause human illness. In prepared remarks, the Principal Deputy Assistant Attorney, Benjamin C. Mizer indicated that FDA and DOJ view any human illness caused by a food product as a potential violation of the law.

Additionally, FDA will seek to establish partnerships with other Federal Agencies and with State, local, and tribal governments for implementation of this rule.

Congress has made the prohibition on introducing adulterated food into interstate commerce a strict liability offense, meaning that a company or individual violates the law and can face criminal charges whether or not it intended to distribute adulterated food.

# **Primary Responsibility**

The rule identifies **shippers** as having the primary responsibility in determining appropriate transportation operations. Shippers may rely on contractual agreements to assign some of the responsibilities to other parties. The FDA defines 'shipper' as a person (such as the manufacturer or a freight broker) who arranges for the transportation of food in the United States by a carrier or multiple carriers sequentially. Specifically, the rule requires:

- Shippers to develop and implement written procedures to ensure that equipment and vehicles are properly designed, maintained and in appropriate sanitary condition.
- Shippers of food transported in bulk must develop and implement written procedures to ensure that a previous cargo does not make food unsafe.
- Shippers of food that require temperature controls must prevent contamination of ready to
  eat food from touching raw food; provide protection of food from contamination by non-food
  items in the same load or previous load; provide protection of food from cross-contact; and
  must also develop and implement written transport operational procedures to ensure that
  food is transported under sanitary conditions.

# **Verification Activities**

While primary responsibility initially lies with the shipper but can be transferred to others via specifications and/or contractual language, it is important that all parties and personnel in the integrated supply chain for refrigerated transport of food be prepared to verify and properly document that others with primary responsibility for implementation have done so.

# **Key Requirements**

Essentially, the STF rule allows the transportation industry to continue to use best practices (*i.e.*, "commercial or professional procedures that are accepted or prescribed as being correct or most effective) concerning cleaning, inspection, maintenance, loading and unloading, and operation of vehicles and transportation equipment that it has developed to ensure that food is transported under the conditions and controls necessary to prevent adulteration linked to food safety.

Specifically, the STF rule has established requirements for vehicles and transportation equipment, transportation operations, records, training and waivers.

# (§1.906) Vehicles and Transportation Equipment

The design and maintenance of vehicles and transportation equipment must be such 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 sanitary transport of food. Specific, final ruling language follows:

1.906a Vehicles and transportation equipment must be designed and of such material and workmanship to be suitable and adequately cleanable for their intended use to prevent food from becoming unsafe.

- 1.906b Vehicles and transportation equipment must be maintained in such sanitary condition for their intended use to prevent food from becoming unsafe.
- 1.906c Vehicles and transportation equipment used for food requiring temperature control for safety must be designed, maintained and equipped, as necessary, to provide adequate temperature control to prevent the food from becoming unsafe.
- 1.906d Vehicles and transportation equipment must be stored in a manner that prevents harborage of pests or becoming contaminated in any other manner that could result in food becoming unsafe.

# (§1.908) 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). Specific final language of the ruling follows:

- 1.908a General Requirements: Applies to all shippers, carriers, loaders, and receivers. A person may be subject to these requirements in multiple capacities.
  - Competent supervisory personnel must be assigned the task of ensuring compliance with STF requirements.
  - Transportation operations must be conducted so as to prevent food from becoming unsafe, including taking measures such as segregation, isolation, and packaging to separate foods; taking protective measures for food in bulk vehicles or not completely enclosed in a container from contamination and cross contact; and ensuring that food that requires temperature control for safety is transported under adequate temperature control.
  - Relevant factors (e.g., animal food vs. human food, raw material vs. finished food) must be specified in determining the necessary conditions and controls for the transportation operation.
  - Shippers, receivers, loaders and carriers, which are under the ownership or operational control of
    a single legal entity, may conduct transportation operations in conformance with common,
    integrated, written procedures that ensure the sanitary transportation of food consistent with the
    requirements of this section.
  - If a covered entity becomes aware of an indication of a possible material failure of temperature
    control or other conditions that may render the food unsafe the food shall not be sold or
    otherwise distributed until it is determined by a <u>qualified person</u> that the temperature deviation
    or other condition did not render the food unsafe.

**Editor's Note**: The STF rule defines a "Qualified Person or Qualified Individual" as someone who is "qualified by training or experience to make such a determination. He should have a scientific understanding of how the temperature deviation could affect the growth of pathogens or production of toxins in the food."

The STF rule further states, "It is our expectation that, under such a circumstance, the receiver (or shipper, if that is the more appropriate party to make the determination) would request temperature control information from the carrier. The carrier would be obligated to provide that information to the shipper or receiver under the provisions of § 1.908(e)(2).

# 1.908b Requirements Applicable to Shippers

- Requires that the shipper provide in writing to the carrier and, when necessary, the loader, all necessary sanitary specifications for the carrier's vehicle and transportation equipment to prevent the food from becoming unsafe.
- Shipper must specify in writing to the carrier, except a carrier who transports food in a thermally insulated tank, and when necessary the loader an operating temperature including, if necessary, the pre-cooling phase for a food requiring temperature control for safety.
- Shipper must develop and implement written procedures adequate to ensure that vehicles and equipment are in appropriate sanitary condition for the transport of food. Measures to implement the procedures may be done by the shipper or another party under the terms of a written agreement.
- Shipper of food transported in bulk must develop and implement written procedures adequate
  to ensure that a previous cargo does not make the food unsafe. Measures to implement the
  procedures may be done by the shipper or another party under the terms of a written agreement
- Shipper of food that requires temperature control for safety must develop and implement written
  procedures to ensure the food is transported under adequate temperature control. Measures to
  implement the procedures may be done by the shipper or another party under the terms of a
  written agreement and must include measures equivalent to those specified for carriers in 1.908e.

#### 1.908c Requirements Applicable to Loaders

- Before loading food not completely enclosed by a container, the loader must determine, based as appropriate on shipper specifications that the vehicle or transportation equipment is in appropriate sanitary condition (*e.g.*, adequate physical condition, free of visible evidence of pest infestation, and previous cargo that could make the food unsafe).
- Before loading food requiring temperature control for safety, the loader must verify, considering
  as appropriate the shipper specifications, that each mechanically refrigerated cold storage
  compartment or container is adequately prepared, including proper pre-cooling if necessary

## 1.908d Requirements Applicable to Receivers

Upon receipt of a food requiring temperature control for safety, receivers must take steps to
adequately assess that the food was not subjected to significant temperature abuse, such as
determining the food's temperature, the ambient temperature of the vehicle, or smelling for offodors.

**Editor's Note**: If a receiver becomes aware of an indication of a possible material failure of temperature control or other conditions that may render the food unsafe during transportation, the person must take appropriate action, to ensure that the food is not sold or otherwise distributed unless a determination is made by a **qualified individual**, that the temperature deviation or other condition did not render the food unsafe.

# 1.908e Requirements Applicable to Carriers

- Per an agreement with the shipper that the carrier is responsible...
  - The carrier must ensure that vehicles and equipment meet the shipper's specifications (in accordance with 1.908b) and is otherwise appropriate to prevent the food from becoming unsafe.
  - Upon completion of the transport and if requested by the receiver, the carrier must provide the operating temperature specified by the shipper and, if requested by the shipper or receiver, demonstrate that temperature conditions were maintained during transport consistent with shipper specifications.
  - Carriers must pre-cool each mechanically refrigerated cold storage compartment as specified by the shipper before offering a vehicle for transport of food requiring temperature control for safety.
  - If requested by a shipper, a carrier that offers a bulk vehicle must identify the previous cargo.
  - If requested by a shipper, a carrier that offers a bulk vehicle must provide information that describes the most recent cleaning of the vehicle.
- Carriers must develop and implement written procedures that...
  - Specify practices for cleaning, sanitizing if necessary, and inspecting vehicles and transportation equipment to maintain them in appropriate sanitary condition.
  - Describe how it will comply with the temperature control requirements
  - Describe how it will comply with the provisions for use of bulk vehicles.

#### (§1.910) Training Requirements for Carriers Engaged in Transportation Operations

Training is required when the carrier and shipper agree that the carrier is responsible for sanitary conditions during transport. Carriers must also establish and maintain records documenting the training including the date of the training, the type of training, and the person(s) trained.

# (§1.910) Record Requirements for Shippers, Receivers, Loaders and Carriers

Records must be maintained 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. Specific language of the final STF ruling follows:

1.912a Requires shippers to retain records that demonstrate that they provide specifications and operating temperatures to carriers for 12 months beyond termination of the agreement with the carriers. Also requires shippers to retain records of written agreements and procedures required by 1.908b for a period of 12 months beyond when the agreements and procedures are in use.

- 1.912b Carriers must retain certain written agreements and records of written procedures for 12 months beyond when the agreements and procedures are in use.
- 1.912c Carriers must retain training records for 12 months beyond when the person identified in records stops performing the duties for which they were trained.
- 1.912d Requires persons subject to the rule to retain written agreements assigning tasks covered by the rule for 12 months beyond the termination of the agreement.
- 1.912e Requires that covered parties which operate under ownership or control of a single legal entity must retain records of their written procedures for 12 months beyond when the procedures are in use.
- 1.912f Requires that covered parties (including loaders and receivers) make all records available to duly authorized individuals upon request.
- 1.912g Records must be kept as original records, true copies, or electronic records.
- 1.912h Clarifies that electronic records are exempt from the requirements of part 11
- 1.912i Allows for offsite storage of records after 6 months and clarifies that electronic records are onsite if they are accessible from an onsite location.
- 1.912j All records are subject to disclosure.

# (§1.914-1.934) Waivers

The FDA reserved the right to waive requirements of the STF if it is determined that:

- The waiver will not result in the transportation of food under conditions that would be unsafe for human or animal health.
- The waiver will not be contrary to the public interest.

See more details on waivers in the <u>FDA's STF final rule in the Federal Register</u>.

# 2. Training and Education

The most vital component to ensuring sanitary transportation practices and ultimately preventing claims, lawsuits and unsafe food is knowledge. Understanding the FDA's food safety laws and the requirements placed on the transportation industry is critical to protecting shippers, carriers, loaders, receivers and the entire industry.

#### 2.1. Driver Training and Written Procedures

The FDA STF final ruling requires that carriers provide awareness training to personnel engaged in transportation operations when the carrier and shipper have agreed via written contract that the carrier is responsible for the sanitary conditions during transportation operations. This includes awareness of potential food safety problems that may occur during transportation and basic sanitary transportation practices to address those problems. This training must be provided upon hiring and thereafter as necessary.

The rule also requires that carriers maintain records for one year documenting the training required and completed. Records of this training should include:

- Date of training
- Type of training
- Person(s) trained

The definition of 'sanitary' will be determined by the shipper as dictated in individual FSP requirements. The carrier will ultimately need to ensure the proper training to meet the requirements they agree to meet.

# 2.2. Competent Supervisory Personnel

The FDA STF final ruling requires that competent supervisory personnel be capable of understanding and implementing sanitary food transportation practices, principles and protocols. This includes, but is not limited to, the creation of supporting documents and food safety plans as well as corrective action plans for temperature deviations. Supervisory personnel should be capable of training others to perform and monitor sanitary food transportation duties as well as manage records to support sanitary food transportation activities.

# 3. Pre-Requisite Programs and Defined Food Safety Procedures

The relationship between shippers, carriers, loaders and receivers is key to maintaining an uninterrupted cold chain and more important than ever to ensure that expectations are clearly defined, communicated and documented in appropriate food safety plans and contracts. All parties need to understand their roles and responsibilities in meeting the guidelines identified by the shipper (as per FDA STF Ruling) to ensure food safety and protect liabilities including lawsuits and claims due to failure to meet specifications.

The STF puts primary responsibility on shippers for outlining requirements for the sanitary transport of food; however, carriers, loaders and receivers need to clearly communicate their capabilities, clarify expectations, ensure requirements are attainable and agree to the actions. While best practices have long been utilized to ensure the sanitary transport of food, the STF ruling provides an opportunity to improve communication between responsible parties, better define accountabilities and expectations, and ensure both are reasonable, manageable and achievable in protecting the safety of the load.

Bills of Lading, waybills or similar documentation of transport requirements must have clear and measurable requirements that eliminate the possibility of misinterpretations or legal dispute. For example, the variables are enormous when it comes to temperatures in trailer and in product; simply stating what the thermostat should be set at for a particular load and trailer configuration will provide an attainable action.

Following are suggested communication points and basic pre-requisite items for shippers and carriers to consider when determining/negotiating transportation requirements. Processes will vary by business model and situation but general pre-requisites transcend most types of refrigerated trucking and effectively cover the basics. The end goal is always to ensure a seamless cold chain and to promote positive working partnerships that benefit all parties. In the end, carriers, loaders and receivers should verify that they have the final detailed instructions and requirements from the shippers in writing to ensure compliance.

# 3.1. Appropriate Equipment Design and Maintenance

Proper design, performance and maintenance of equipment used to handle, transport and store perishable foods is a fundamental pre-requisite of safe food handling, and a core industry best practice. Selecting the proper equipment for food transportation is a management decision, and clear communication between shipper, carrier and receiver with the appropriate equipment supplier is required. Equipment must be capable of reaching and maintaining specified temperatures for safe food transport under normal and customary operating conditions. Equipment manufacturing design and performance specifications should be referenced, understood and acceptable before selecting equipment for refrigerated food use.

Likewise, once the desired equipment has been identified and selected for the sanitary transport of food, the equipment must be properly and regularly maintained. Maintenance includes physical and sanitary conditions suitable for food transport. Equipment checklists and maintenance protocols are located elsewhere in this document and/or through GCCA core partners.

# 3.2. Vehicle and Equipment Storage

Vehicles and transportation equipment must be stored in a manner that prevents harborage of pests or becoming contaminated in any other manner that could result in food becoming unsafe for human or animal consumption. This industry best practice applies not only to those vehicles and transportation equipment in service, but to trucks, trailers and handling equipment that is not in use. Key elements of a good vehicle and equipment storage plan include a monitored pest control program; secure storage areas and sanitation records to support proper put-away and return-to-service sanitation and maintenance programs.

# 3.3. Food Safety Procedures (FSP)

Transportation operations are a cooperative effort between the shipper, loader, carrier and receiver of perishable foods, and must be coordinated such that food is transported in a sanitary manner. In order to accomplish this over-arching goal, clearly defined and written transportation procedures, specifically related to maintaining food safety, must be developed and shared with all parties involved in the transport of perishable foods. These types of plans should include, at a minimum, specifications or parameters for packaging, stowage, temperature management, sanitation and handling. Food safety procedures should be product specific, but can include general as well as specific instructions for maintaining product safety during transit. Facilities with Food and Drug Administration (FDA) or Unites States Department of Agriculture (USDA) regulatory plans in place (including but not limited to Hazard Analysis of Critical Control Points [HACCP], Good Manufacturing Practices [GMP], Standard Operating Procedures [SOP], or Sanitation Standard Operating Procedures [SSOP], or other certification programs [GFSI, BRC, SQF, ISO, etc.]) can reference those plans as part of a comprehensive FSP for transport of perishable foods. It should be noted that other elements of the Food Safety Modernization Act require compliance with the FDA Food Controls Regulation or equivalent standard for food processing within the FDA and/or USDA.

# 3.4. Temperature Requirements

Naturally, the type of goods being transported will determine the temperature requirements. The FSP should include a specific numeric temperature or a range of temperatures in either Fahrenheit or Celsius to be maintained during transport with specified tolerances specified "not to exceed' (also called Upper Control Limit, UCL) and "not below" (also called Lower Control Limit, LCL) margins. Plans that reference simply 'frozen' or 'chilled' as temperature requirements should not be accepted.

GCCA members may also access the <u>Commodity Storage Manual</u> that offers explicit details about the storage and transportation conditions necessary to maintain food safety and ideal food quality. As the carrier/loader/receiver is liable for both food safety and cargo quality/condition<sup>1</sup> during transport (as

<sup>&</sup>lt;sup>1</sup>Condition and quality with respect to fresh fruits and vegetables are terms of art used by commercial and regulatory authorities to describe the general marketability of the products. The term condition relates to defects that change over time whereas the term quality pertains to defects, which are of a permanent nature and do not change in severity or incidence over time.

per STF ruling), understanding the distinct differences between the two and the impact of temperature on each is critical to successful fulfillment of the carriage contract.

If a temperature monitoring device is used during transport the shipper and carrier should agree upon the parameters of use, including but not limited to:

- What frequency of data should be collected?
- What tolerances will be allowed?
- How should the data be collected and transmitted?

# 3.5. Time &Temperature Deviations and Corrective Actions

Shipper specified transport temperatures; including set-point temperature as well as upper control limit (UCL) and lower control limit (LCL) are used to establish the desired temperature zone as well as minimum and maximum safe zones for the product. However, if the UCL is exceeded during transit for a specified cumulative exposure times, the deviation may result in unsafe food. The written Food Safety Procedures should clearly identify the procedures to be taken if cumulated time by temperature deviations occurs in transit, including provisions for product inspection and the criteria for determining if food safety has been compromised. Corrective Actions for preventing further or repeat damage as well as possible disposition of damaged goods should be included.

#### 3.6. Segregation of Goods

As per the STF, shippers should provide clear instructions on the co-mingling of goods and provide special instructions as desired. Carriers, especially ones engaged in mixed load, less than truckload ("LTL") and/or multi-stop services, may be held liable for cross contamination if they fail to follow shipper instructions. Remember all practices should focus on reducing safety risks and the STF ruling allows shippers, carriers, loaders and receivers to exercise best judgment in the development of FSPs and interpretation. Depending on the situation, it is recommended that the shipper include written exclusions or specific instructions when necessary. For example, list specific goods that should not be transported in the same trailer (such as fresh produce in ventilated boxes alongside or under fresh poultry).

#### 3.7. Bulk Foods

Shippers of refrigerated Bulk Foods are required to ensure the sanitary transport of the commodity, including communication with others in the integrated supply chain (loaders, carriers and receivers). Written procedures for the safe loading, storage and transport of the bulk food must be developed and implemented. These procedures should include the proper temperature parameters, including set-point temperatures as well as UCL and LCL temperatures. Cleaning and sanitation of bulk food containers (trailers) is a critical step in the food safety procedures, and should include proper cleaning and sanitation procedures as well as information about the most recent cleaning of the trailer. The carrier should be prepared to provide information about the recent cargo shipments as well as cleaning and sanitation records for the bulk food trailer upon request. Maintenance of bulk transport vehicles

is important, and the carrier should develop written procedures for maintaining the trailer and be prepared to provide that information upon request.

#### 3.8. Sanitation and Equipment Standards

Under the STF ruling, the language regarding sanitation and/or cleaning of transportation equipment is more flexible and vague, leaving specific requirements to be determined by shipper in their FSP. In fact, the STF rule does not define cleanliness or offer standards for cleanliness. Moreover, cleaning after Under the STF ruling, the language regarding sanitation and/or cleaning of transportation equipment is flexible and vague, leaving specific requirements to be determined by shipper in their FSP. In fact, the STF rule offers does not define cleanliness or offer standards for cleanliness. Moreover, cleaning after each shipment raises possible conflicts with environmental laws and local, state and federal water use and water drainage/runoff issues. In many jurisdictions, carriers are prohibited from washing their trucks because of local regulations designed to protect from water runoff and water quality issues. This places carriers in the position of having to choose which regulation to follow.

Examples of factors/Items to address in a FSP might include:

- Define "sanitized" versus "clean"
- Define specific action list visual inspection, wash down, etc.
- Clarify equipment rejection and remedy standards
- What documents will be accepted as verification
- Responsibility of carrier, loader, etc.

Trailer sanitation should be verified prior to loading as well as during transit. A Trailer Inspection Checklist has been provided in the <u>Appendix</u> of this document.

#### 3.9. Other Considerations

While the STF deals strictly with the sanitary transportation of food, a solid FSP/pre-requisite transportation process should include other factors such as:

- Rates and terms
- Load configuration/dunnage
- Identification of other involved parties such as brokers, and agents
- Limits of liability
- Insurance requirements
- Authorized personnel and contacts

# 4. Refrigerated Trailer Sanitary and Condition Inspection

Equipment transporting human or animal food items requires a higher level of inspection and maintenance. Equipment needs to be clean and otherwise suitable for the transport of food items or goods associated with the manufacture of food items. Improper or incomplete cleaning and / or sanitizing practices can allow contaminants to spread. As per the FSMA final STF ruling, requirements for cleaning, sanitizing and inspecting equipment apply to all shippers, carriers, loaders and receivers. However, shippers continue to hold primary responsibility for sanitary conditions of transport – specifically in documenting the required procedures expected -- unless the carrier has entered into a written agreement with the shipper to assume this responsibility.

The STF rule states that competent supervisory personnel should be designated to ensure compliance. This will most likely be the facility's Preventative Controls Qualified Individual (PCQI) who is responsible for developing a facility's Food Safety Plan (FSP). This is a requirement of the FDA's FSMA Preventative Controls for Human Food rule, effective September 19, 2016 for most businesses. Requirements include establishing and implementing a food safety system that includes an analysis of hazards and risk-based preventive controls.

## 4.1. Cleaning and Sanitation

Cleanliness prevents bacterial, chemical, and odor contamination of food product loads. Remove all loose debris and wash or sweep the floors clean. The floor drains and grooves should be free of debris so drainage will not be blocked. Certain cleaning procedures may be required by law (for example: in cases where a meat product may become contaminated by direct or indirect contact with the interior surfaces of the vehicle) or due to specific and individual Food Safety Plan requirements.

Certain food products, such as fatty or oily goods such as butter, oleomargarine and meats, are highly susceptible to strong odor contamination. Fresh fruit, such as apples and bananas, are also susceptible to odor absorption. Thorough cleaning and air sanitation of boxes previously used for hauling odorous products such as fish, or cabbage is necessary to prevent contamination.

#### 4.2. Sanitation Standards

As per the FSMA final STF ruling, shippers are required to develop and implement procedures that specify their practices for cleaning, sanitizing and inspecting their equipment. Factors that need to be considered include: 1) how the vehicle/equipment is being used; and 2) the production stage of the food being transported (raw vs. finished product; open vs. closed container).

#### 4.3. Trailer Condition Inspection Requirements

Equipment requirements vary for refrigerated trailers and will be determined by cargo hauled along with applicable Food Safety Plans and requirements as deemed appropriate by the shipper. To guide you, see the Appendix for example checklists that represent common requirements for refrigerated trailers and refrigeration units.

NOTE: Drivers are required to conduct physical inspections of their assigned vehicles prior to departure. Inspections and checklists will vary by location.

# 5. Refrigeration Unit Operating Procedures

Most refrigeration units for trucks and trailers, also known as Transportation Refrigeration Units (TRU), are equipped with computerized controls, and Electronic Throttling Valves (ETV). These computerized refrigeration units offer significant benefits to transportation companies, drivers, shippers and receivers. The refrigeration unit's computer system includes various levels of guarded access thereby protecting the refrigeration unit from tampering and unwelcome changes.

The computerized system also permits the operator to set up pre-determined temperature management conditions including critical control limits for perishable foods. Product storage guidelines can be utilized to help set up carrying temperature parameters for perishable and temperature sensitive products transported in these refrigeration units. In this guidebook, we have selected some of the features from computerized truck and trailer refrigeration units to demonstrate uses and benefits of these technologies for food safety and carriage of perishable foods.

**Important to note:** Transport refrigeration units should always be operated in accordance with the manufacturer's refrigeration unit operating manual as settings and equipment performance characteristics may and do vary from manufacturer to manufacturer. It's imperative to <u>follow specified refrigeration unit operating procedures</u> when transporting refrigerated cargo, as well as the shipper's written specifications and the Preventative Controls Qualified Individual (PCQI)/facility's Food Safety Plan (FSP).

## 5.1. Pre-Loading

Before picking up a load, always run the refrigeration unit in high speed cool for at least 20 minutes and perform an automatic Pre-Trip test. The unit MUST pass the Pre-Trip test. If it doesn't, follow your companies prescribed procedures.

#### **5.2.** Identify and Program Unit Set-Point

Truck and trailer refrigeration unit microprocessors, also known as data loggers, offer technological advances that can markedly reduce human errors, driver decision making and driver intervention. The computerized refrigeration unit takes complex commodity-related decision-making out of the hands of the driver and utilizes the expertise of commodity specialists and experts to assist the carrier in setting up custom-tailored computerized systems for their valued shippers and receivers. It should be noted that carriers using these computerized systems should seek guidance from subject matter experts in order to optimally set up shipper derived and specified carrying conditions for the sanitary carriage of perishable cargoes.

These technological advances, which are available with computerized refrigeration units, can be incorporated directly into quality control and food safety plans. The data logger provides the record keeping and verification that shippers, receivers and carriers can incorporate into their quality control

and food safety plans. Data loggers store data and generate graphs, tables, and printouts for recording and verifying time and temperature in-transit.

The benefit of these systems is that the driver now makes fewer decisions and fewer mistakes. Driver-related errors can be reduced because tasks like setting the thermostat, initiating start of trip, conducting a pre-trip, setting the mode and initiating the defrost are made easier and simpler.

**Start of Trip:** The "start of trip" feature offered with computerized refrigeration units are simple to use and, importantly, it is a critical ingredient for establishing when the carrier started the trip and potentially when the carrier took care and custody of the cargo. Accordingly, it is crucial that the start of trip feature be initiated in order to ensure that the time and date of a trip is properly entered and documented for future reference. The "start of trip" is the beginning of a road map that can clearly help show when the accountability shifts from shipper to the carrier to the receiver.

**Computerized Pre-trip:** "Pre-tripping" the refrigeration unit and documenting the time and date of pre-trip is a key ingredient to assuring that the refrigeration unit is operating correctly and to preventing losses and mitigating claims and litigation. Pre-tripping the refrigeration unit should be accomplished before each line haul trip. It can be easily accomplished and recorded anytime. As part of the central nervous system of the refrigeration trailer, the refrigeration unit can be automatically pre-tripped whenever the unit is running.

As a general rule, users should set the unit controller to the desired set-point temperature and other settings (such as OptiSet™ in Thermo King units or Intelliset™ in Carrier Transicold units), as determined by product and/or shipper requirements. Refer to the unit Operators Manual for instructions on how to operate your specific unit. Once the set-point and other key settings are programmed, always double-check the settings to ensure there were set properly and to help prevent potential cargo damage that can result from an improperly set point temperature and/or other refrigeration unit settings.

# **5.3. Select Mode of Operation**

Select the proper operating mode as appropriate for the cargo being transported and/or per shipper requirements. Choose either the 'Continuous Run' or the CYCLE-SENTRY (also known as "START-STOP") mode appropriate for the cargo being transported. Operating a unit on CYCLE-SENTRY with cargo that requires tight temperature control or continuous airflow operation is not recommended and can result in product hot spots and / or top freezing. Refer to the most recent CYCLE-SENTRY/START-STOP Operation & Diagnosis manuals from your refrigeration unit manufacturer for additional details.

Before loading product, pre-cool the trailer or container to the desired carrying temperature unless otherwise specified by the shipper and carrier. Turn the refrigeration unit 'OFF' when product is ready to be loaded and BEFORE box doors are opened. Additional information about pre-cooling is provided elsewhere in this document.

After loading is complete, close the doors immediately, start the refrigeration unit and re-confirm that the correct operating mode and settings have been selected.

Initiate a manual defrost cycle to remove any frost or ice from the evaporator coil and to help ensure maximum cooling performance after defrost is completed. When defrost is complete, the unit should return to normal operation. The box temperature should then begin to return toward the 'desired' cargo temperature.

#### **5.4.** Multi-Temperature Refrigerated Trailers

With the growth of the food service industry, the fleet of multi-temperature refrigerated trailers has continued to increase in size and significance. Multi-temperature refrigerated trailers are equipped with evaporators and host unit controls that provide different temperatures in one trailer. These units now feature microprocessors that control, monitor, pre-trip and trouble-shoot each temperature zone within the complete multi-temperature system.

Some of the features offered with single-temperature refrigeration units have been incorporated into multi-temperature refrigeration systems. Designing and using advanced multi-temperature technologies requires that users pay special attention to environmental conditions, commodity mixes, temperature control, airflow, bulkheads, driver access, side doors, walk ramps and lighting. These trailers have to work as a system that specifically meets the unique needs of buyers, drivers and customers.

Industry Best Practices should include a detailed and clearly defined written procedure, created by the shipper, outlining the parameters and proper temperature management of multi-temperature trailers. Additionally, while it is generally acceptable to transport chilled and frozen products in the same multi-temperature trailer provided the aforementioned environmental conditions are met, it is not advisable to transport ambient (dry) and refrigerated (chilled and/or frozen) products in the same multi-temperature trailer. Furthermore, it is recommended that hazardous cargo (i.e. chemicals and cleaning supplies) <u>never</u> ship with edible animal and human food in the same trailer.

# **6. Pre-Cooling Trailers**

Pre-cooling trailers is a crucial part of the refrigerated distribution process and represents a industry Best Practice for carriers. It is imperative that every trailer is pre-cooled before the loading process begins to remove residual heat. Loading a warm trailer with refrigerated product will result in a transfer of thermal energy from the product to the trailer. The warmth of the trailer will draw the cold energy out of the product starting the process of thermal inertia and putting product quality at risk.

Due to the radiant heat load of the sun (infra-red light), heat is transferred into the trailer when it is empty and not running. The air in the trailer as well as the truck's structural members, interior skins and insulation absorb heat. Pre-cooling the trailer removes this residual heat and protects the cargo from heat-related damages.

### 6.1. Trailer Settings

Once a trailer is assigned for a trip, it should be re-located to an area designated and cleared of any pallets, shipping materials or debris, and cleaned and sanitized per the shipper's specifications or the facility's Preventative Controls Qualified Individual (PCQI) FSP. If specified by the shipper, in writing, the trailer should be pre-cooled prior to loading.

#### **6.2. Pre-Cooling Settings**

When pre-cooling the trailer, the thermostat should be set to the desired carrying temperature for single temperature trailer or to multiple temperatures for the multi-temperature host unit and remote evaporator unit. The refrigeration unit should run at the desired carrying temperature until the unit shifts to low speed operation just before loading the cargo. Generally, pre-cooling a trailer can be accomplished in less than two hours.

The trailer refrigeration settings should be adjusted in accordance with shipper's compliance requirements (i.e. fresh, frozen or multi-compartment). Pre-cool the entire trailer as a single compartment.

For pre-cooling purposes, the trailer should be pre-cooled to the coldest temperature required by the cargo being hauled. For example, if the route calls for a multi-temperature load of fresh and frozen, it should be pre-cooled to the designated frozen requirement.

It should be noted, however, that most international transportations companies have policies "AGAINST" pre-cooling refrigerated containers in a hot humid and open environment. Refrigerated loading docks with cold tunnels are recommended. In many but certainly not all loading facilities, cold tunnels are situated tightly duct between the climate controlled loading dock and the container. The cold tunnels prevent outside ambient air from entering the refrigerated dock and the interior of pre-cooled containers.

When perishable cargo is loaded in a hot humid ambient environment, moist air can enter the interior of the pre-cooled container when the doors are opened. Using this scenario, the possibility exists that moisture can condense (dew point condition) on the interior surfaces of the pre-cooled container. Under hot humid conditions, we have typically noted condensation at the rear of the pre-cooled container/on the ceiling. The concern is that moisture on the ceiling might fall on the cartons. In open conditions with hot humid air, we also have witnessed condensation forming on the exposed cartons ("cargo sweat") when the supplier moves the refrigerated cargo from the cold room to a hot, humid dock or open space. Under hot, humid conditions, the problem of cargo sweat (moisture on the cartons) will likely persist even if the refrigerated container is not pre-cooled.

#### **6.3. Pre-Cooling Notifications**

Pre-cooling trailers may take up to two hours or possibly more to maintain stable temperatures. Trailers outfitted with real-time telematics devices can automatically provide compartmental air temperature verification and notify personnel when the trailer is ready for relocation to the appropriate dock door for loading.

For those trailers not outfitted with real-time telematics, manual temperature readings will need to be taken by appropriate personnel to confirm that the trailer has achieved the proper temperature levels. This can be done with a handheld and properly calibrated temperature device.

**Note**: Refrigeration unit display readings should not be used to determine the pre-cooling status because they do not accurately portray the compartmental temperatures.

Remember to turn the refrigeration unit OFF after the trailer/box reaches the desired pre-cooled temperature and during the loading process. This will minimize heat and humidity entering the box.

# 7. Loading Procedures

The way cargo is loaded into a refrigerated trailer, body, or box, can have a significant effect on product quality. Proper loading will help ensure cargo quality/condition is maintained throughout its journey and mitigate risks for shippers. Many factors and steps should be considered to ensure proper loading procedures including choosing the proper trailer, product packaging, cargo temperature, refrigeration unit operating procedures, and airflow. Loaders, carriers and receivers should always cross-check procedures with the shipper/PCQI Food Safety Plan (FSP) to ensure requirements are met and actions are taken to ensure compliancy.

Loaders (and un-loaders), in particular, play a crucial role in ensuring sanitary transportation operations, as they are the people on the docks who have eyes on the equipment and product. The STF specifically states that before loading food not completely enclosed by a container onto a vehicle or into transportation equipment, the loader should determine, considering as appropriate, specifications provided by the shipper (in FSP), that the vehicle or transportation equipment is in appropriate sanitary condition for the transport of the food. In other words, make sure 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.

Likewise, before loading food that requires temperature control for safety, the loader must verify according to the specifications provided by the shipper (in FSP), that each mechanically refrigerated cold storage compartment or container is adequately prepared for the transportation of such food, including that it has been properly pre-cooled, if necessary, and meets other sanitary conditions for food transportation.

#### 7.1. Trailer Assignment and Pre-Loading Safety Inspection

Once the correct trailer is assigned, prepared and pre-cooled (if specified by the shipper), it should be moved to the designated dock door for loading. When the trailer has been backed into place for loading, it must be properly secured.

Suggested steps include:

- Secure the Glad Hand Locks
- Secure the Wheel Chocks

- Ensure the trailer is properly spotted in the Dock Door
- Ensure that the dock door is not opened until Trailer is spotted and secured

Once the trailer is physically secured and in position, warehouse personnel should:

- Secure the Dock Door Seals
- Raise the Dock Plate
- Ensure the Dock Light is "Green" before opening up the trailer door

Next, check the condition of the trailer compartments and components:

- Verify Operational Readiness of the Trailer
  - No Debris/ Obstructions
  - Cleanliness Check (Free of pest, microbes, etc.)
  - Bulk Head(s) are functional
  - Straps and Load bars (E-tracks) are functional

Finally, verify that the trailer is properly pre-cooled and operationally ready to be loaded. If not previously completed before the trailer was positioned at the dock, trailer air temperatures must be confirmed in in the forward (nose) section and the back (tail) section of the trailer. Remember, checking the refrigeration set points is not enough to confirm whether or not a trailer is pre-cooled.

#### 7.2. Refrigeration Unit Operating Procedures – Pre-Loading

It's imperative to <u>follow proper refrigeration unit operating procedures</u> when transporting refrigerated cargo. Before picking up a load, always run the refrigeration unit in high speed cool for at least 20 minutes and perform an automatic Pre-Trip. The unit MUST pass the Pre-Trip test. If it doesn't, follow your companies prescribed procedures.

Set the unit controller to the desired set-point temperature, as determined by product, customer and/or shipper requirements. Refer to the unit Operators Manual for instructions on how to operate your specific unit. Once changed, always double check the setting to ensure it was set properly and to help prevent potential cargo damage that can result from an improperly set temperature.

Upper Control Limits (UCL) are critical for optimizing shelf life and for control of food spoilage and poisoning organisms that grow on frozen and chilled cargoes. In fact, the advantages of setting and locking the data loggers upper and Lower Control Limits (LCL) are ominous. Today's refrigeration units can be set up for Hazard Analysis of Critical Control Point (HAACP) plans targeted at establishing time-temperature critical limits. The critical limit is the point that if exceeded, the safety of the product may be questionable. In practice, the typical operating limit for a carrier would be more restrictive than the critical limit. If the operating limit is triggered, a carrier should take corrective action to fix a problem before it becomes "critical."

Select the proper operating mode as appropriate for the cargo being transported and/or per shipper requirements. Choose either the CONTINUOUS RUN or the CYCLE-SENTRY (also known as "START-STOP") mode appropriate for the cargo being transported. Operating a unit on CYCLE-SENTRY with

cargo that requires tight temperature control or continuous airflow operation is not recommended and can result in product hot spots and / or top freezing. Refer to the most recent CONTINUOUS RUN/CYCLE-SENTRY/START-STOP Operation & Diagnosis manuals from your refrigeration unit manufacturer for additional details.

Before loading and if specified by the shipper, pre-cool the trailer box with the doors closed in order to remove residual heat from the walls, floor and ceiling. This will increase the likelihood of successfully maintaining the desired temperature throughout the entire transit time. Turn the refrigeration unit 'OFF' when product is ready to be loaded and BEFORE box doors are opened.

It should be emphasized that best practices guidelines consistently indicate that the refrigeration unit should be turned off when the doors are open. During loading and off-loading (devanning), and at all times when the trailer door is open, the refrigeration unit must be off to ensure optimum unit performance and cargo integrity.

Turning off the refrigeration unit when the doors are open prevents:

- a. Moisture from accumulating on the evaporator coil
- b. Ice accumulation on the coil
- c. Poor refrigeration performance
- d. Blockage of conditioned air movement to the cargo

Furthermore, running the reefer unit when railcar doors are open causes:

- a. Hot ambient humid air to condense on cargo
- b. Ice and hoarfrost accumulation on the cargo and interior of the trailer (white frost that occurs when water vapor touches surface of frozen cargo and the railcar)
- c. Wet cartons, cargo thawing and temperature abuse

# 7.3. Product Packaging

Proper packaging is critical to ensuring product protection during transport. Choose high quality crush resistant packaging to minimize potential product damage when transporting refrigerated cargo. Solid-side, or non-vented packaging is typically used for frozen products and chilled meat. Vented-side, top and bottom packaging is recommended for fresh, or chilled respiring products.

# 7.4. Staging the Product (Pallets) and Cargo Temperatures

Most products, with a few exceptions like bananas, which are loaded at ambient temperatures, should be at the specified shipping temperature at the time of loading. Always pre-cool and store the cargo at its desired temperature to remove any field heat from the cargo and packaging. Removing both heat sources before loading helps ensure the refrigeration unit can maintain the desired temperature during transit.

The product (pallets) should be staged in a loading zone near the loading dock and ideally prepositioned in a Cool Dock in order to maximize trailer loading efficiency. The quicker the loading process, the quicker you can close the trailer doors which will help reduce the thermal loss and the stabilization of consistent temperatures. Use a thermometer to check the products internal (or pulp) temperature <u>before</u> loading. There are various thermometer types available to choose from for this purpose.

Remember: With a few exceptions (like bananas), refrigeration units are designed to maintain product temperature, not change it. If the cargo is not at the desired temperature before loading, the refrigeration unit may not have enough time or capacity to achieve the desired product temperature pull-down during transit.

A sample Staging Checklist has been provided in the **Appendix** of this document.

## 7.5. Loading the Trailer

After all preliminary work has been completed trailer loading can begin. Loader(s) should only use approved jacks and/or forklifts to load the trailers. Pallets should be loaded in the proper sequence as defined in approved Load Diagrams (see examples elsewhere in this section).

Generally, in multi-temperature zone loads, frozen products are loaded first in the nose of the trailer, followed by the fresh products. Bulkhead walls are used to separate the compartments and seal off the frozen section. Temperature loss in the rear of the trailer is common since the loading dock is typically a "cool dock" which is consistent for loading fresh products.

Load the product quickly and efficiently and use loading patterns that maximize air circulation 'around' and 'through' the entire load for frozen cargo and chill cargoes, respectively. Frozen product should always be palletized and centerline-loaded in order to maintain a cold air envelope around all six sides of the load. Pallet placement must allow refrigerated air to pass between the load, the walls, and the floor. This is particularly important for trailers with low insulation levels for loads shipped under extreme hot or cold weather conditions, for produce items that are extremely perishable, and for trips that last for more than a day or so.

The main objective is to develop a cold air envelope around freeze and non-respiring chill cargoes (like chilled meat) and movement of conditioned air around and though the entire load for respiring cargoes like fruit and vegetables.

The pallet loading pattern (pallet placement) in a trailer must allow conditioned air to pass between the load, walls and the floor. Air flows between the walls and the load only if the pallets or cargo are not touching the walls. Additionally, cargo height should not extend high enough to touch the air chute because air space above the load and unrestricted air flow are needed to distribute conditioned to the walls, floor, cargo and rear of the trailer.

Centerline loading (see diagram below) is a preferred loading pattern since it permits airflow between the walls and the load and utilizes inflatable airbags, foam blocks or other materials to keep the pallets stabilized in the trailer without touching the walls. Since a good deal of heat enters the trailer from the floor, the load must have a bottom air path to prevent product heating. Do not block airflow underneath the load with boxes stowed on the floor or anything that covers pallet forklift openings will block airflow.

Consider the following when loading refrigerated containers:

- Limit access to the trailer during loading to Loader(s) only to ensure safety
- Load product quickly and efficiently from staging area
- Reduce surface contact of product with storage area and loading equipment
- Loading placement should account for proper airflow around all product loaded
  - o Refrigeration return air and discharge air openings should not be blocked
  - Pallets openings should not be obstructed (i.e., no shrink wrapping or slip sheets for respiring cargoes like fruit and vegetables)
- Pallet placements should re-enforce the stability of the load
  - Place pallets side by side to avoid tipping during transit
  - Spacer pallets should be used is an empty grid position
- Bulkheads should be properly secured between frozen and chilled compartment
  - Bulkheads must open for the load to be unloaded safely
  - Secure bulkhead securely into place with strap(s)
- Load bars and straps should be used to properly secure and stabilize the load
  - Lock and secure E-track connectors
  - Tighten straps and secure loose ends so they don't touch the floor

Important to note: Loading patterns will be different for refrigerated containers, trailers and railcars.

#### Pallet Arrangements and Load Length for 24 Standard Pallets in Five Loading Patterns

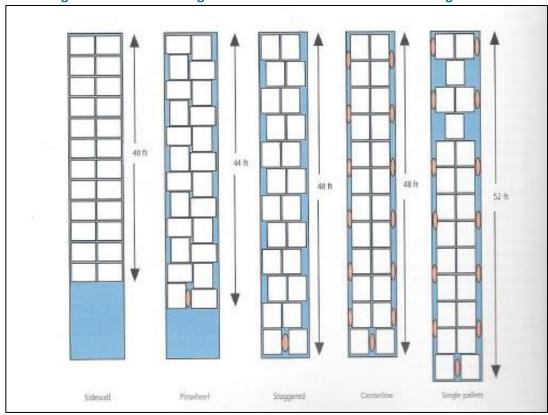


Figure 1: Courtesy of University of California Refrigerated Trailer Transport of Perishable Foods

Once loaded, physically stabilize the load to help prevent potential cargo damage due to load shifts that may occur during transit. The use of strip curtains is another way to minimize inside and outside air exchange and the resulting box temperature change during loading. Strip curtains help keep conditioned air 'In' and outside air 'Out.'

#### 7.6. Trailer Loading Best Practices

- Verify the product being loaded is within the appropriate temperature limits for the product type. The shipper of the product typically establishes these limits.
- Temperature verification can usually be accomplished by placing a calibrated thermometer between two cases of product and recording the stabilized temperature. It is recommended to perform this verification for product being loaded in the nose, middle and tail of the trailer.
- If a multi-delivery load, pallets to be delivered last will be loaded first (in the front of the trailer).
- If the order does not completely fill the trailer, a "Load Bar" should be used to stabilize the load. The load bar should be placed between the wall of the truck and the palletized products, directly behind the last pallets loaded onto the trailer.
- Any product damaged during trailer loading should be immediately addressed according to the customer's previously stated expectations.
- Care should be taken to ensure that the top cases in the trailer do not inhibit airflow from the refrigeration unit in the trailer. It is important to maintain proper and unobstructed airflow around the pallets in the trailer to prevent temperature variations or abuse.
- Bulkheads should be used to separate refrigerated from frozen sections of the trailer.
- Loading the trailer should proceed in an expeditious manner to prevent product temperature abuse.
- After the load has been verified by all interested parties (including the driver), ensure the
  material handling equipment has been removed from the trailer, raise the dock plate to its
  stored position, and release dock restraint.
- Place a unique security seal on the truck door and record the seal number on the shipping paperwork.
- After the trailer has moved from the dock, close the dock door to prevent pest ingress.
- Appropriate records should be maintained for all activities for traceability/recall purposes (lot number and quantity shipped per item, shipping destinations, product temperatures, trailer temperatures – set-point and actual, etc.)

A sample Loading Checklist has been provided in the Appendix of this document.

#### 7.7. Airflow

Today's refrigeration units generally have plenty of cooling capacity to remove heat from pre-cooled cargo and its surroundings. However, because of poor loading, packaging and unitizing practices, the refrigerated air delivered to the cargo space from the refrigeration unit cannot remove the heat from the perishable cargo and from all sides of the load and then return the heat back to the refrigeration unit.

Proper airflow throughout the refrigerated box is critical in maintaining good quality product. Poor air distribution is one of the primary causes of product deterioration. This is the case even when the refrigeration unit capacity is more than adequate.

When loaded properly, there should be sufficient airflow to maintain cargo temperature throughout the entire cargo space. Physical obstructions or restrictions within the box can cause poor airflow and result in product 'hot spots.' Moreover, short-cycling of conditioned air due to poor stowage can lead to hot spots in the load, which in turn causes a myriad of types of cargo losses. Improper stowage is a leading cause of poor temperature management and cargo losses. Inadequate airflow resulting from poor stowage of cargo can also be a root cause of food quality and safety problems and HACCP violations.

Computerized refrigeration units that sense and record short-cycling of improperly loaded trailers, have immediate practical applications by protecting carriers from high cargo temperature related food safety and quality problems as well as unnecessary claims and litigation.

The refrigeration unit delivers conditioned air that either adds or removes heat from the air in the cargo space of the trailer. The process of delivering conditioned air is called air distribution. The time to achieve the desired cargo temperature, called pull-down, is dependent on uniformly distributing the conditioned air to the cargo. Inadequate air distribution is a major cause of perishable cargo losses even with optimally designed refrigerated units and trailers. To optimize temperature reduction (pull-down) and uniformly manage temperature throughout the load, proper air distribution is essential.

The goal of good airflow management is to circulate air around each chilled perishable item and to surround the entire load with conditioned air. The key to success is to avoid short-cycling of conditioned air and to permit conditioned air to flow unrestricted around the perishable items and to all six sides of the load.

Short-cycling is typically due to missing or damaged bulkheads and air ducts and/or vertical channels in the stowage of the cargo. Short-cycling permits conditioned air from the refrigeration unit to return prematurely back to the refrigeration unit without adequately circulating around the cargo. The refrigeration unit performance is based on the temperature of the air that returns back to the refrigeration unit's thermostat sensors. When the cargo is loaded properly, the refrigeration unit's thermostat senses the temperature of air returning from the entire load. In contrast, when short-cycling occurs, the refrigeration unit may not be operating at the desired performance level because the thermostat senses air that has bypassed some or most of the cargo.

Short-cycling of conditioned air due to poor stowage can lead to hot spots in the load, which in turn can cause a myriad of cargo loss types. In fact, improper stowage is a leading cause of poor temperature management and cargo losses. Computerized refrigeration units that sense and record short-cycling of improperly loaded trailers, can have immediate practical applications by protecting carriers and cargo interests from damages caused by high cargo temperature and from food quality problems as well as unwanted claims and litigation.

Another leading cause of poor air distribution with tight loads is blockage of air by plastic wraps, slip-sheets and two-way pallets or pallets with inadequate fork lift pocket openings. Cargo should always be stacked on double-faced pallets with sufficient forklift openings on all four sides (four way pallets). Moreover, plastic should not be wrapped around the unitized palletized loads of respiring cargoes

because refrigerated air is needed to remove the heat of respiration. The use of slip-sheets positioned directly on flat surface or diamond plate floors is not recommended because conditioned air cannot flow under the cargo.

Stacking cargo directly on the floor or against the sidewalls can cause product warming or chilling. With palletized centerline loads, the cargo is held away from the sidewall and floor surfaces; there is no warming or cooling of the cargo due to contact with the sidewall or floor surface.

The majority of temperature management problems are preventable. Proper loading practices and achieving good airflow distribution are essential for the maintenance of desired temperature management. All those involved in the handling of perishable cargoes can help contribute to improved temperature management and fewer cargo losses by making sure that a stowage checklist are followed.

A sample Stowage Checklist has been provided in the Appendix of this document.

In order to create proper air circulation, adequate 'air' space around all six sides of the load is required. Every effort should be made to minimize airflow restrictions.

There are four (4) key factors to consider in achieving proper airflow:

- 1) Floor Design and Cargo Placement: Regardless of the floor design used, minimizing airflow restrictions throughout the entire box is critical. This ensures that air can reach the cargo quickly and efficiently. When using pallets, be sure they have open ends and sides that will allow unrestricted airflow both 'under and through' the slats all the way from the front to the rear of the box. If using plastic wrap, do not install it below the top surface of the pallet. The use of slip-sheets and hand stacking cargo is NOT recommended and is not optimal for cargo temperature management.
- 2) <u>Cleanliness</u>: The inside of the box must be clean to prevent contamination hazards, and the floor channels and refrigeration unit return air stream must be free of obstructions and airflow restrictions. Loose debris such as shrink-wrap, paper, cardboard or any other type of debris can be pulled into the unit evaporator, resulting in insufficient airflow and potential cargo damage.
- 3) Cargo Loading Patterns: Select a loading pattern that will provide sufficient airflow around and through the entire load. This ensures conditioned air from the refrigeration unit can reach all of the cargo. Always leave adequate space between the top of the cargo and the ceiling. Too little space can cause the discharge air to 'short cycle' in the front of the box resulting in 'too little' airflow in the rear. The result: the cargo in front will be too cold and the cargo in the back will be too warm. Do not place cargo directly in front of, or tightly up against the refrigeration unit, walls or doors. This will only prevent conditioned air from reaching portions of the cargo, which will inhibit proper temperature.
- 4) <u>Blockage of Unit Evaporator Inlet and outlets (supply and return air registers)</u>: Ensure that the refrigeration unit evaporator inlet and outlet air paths are not obscured. If blocked, airflow and unit capacity will be reduced, making it difficult (perhaps impossible) for the unit to maintain cargo temperature.

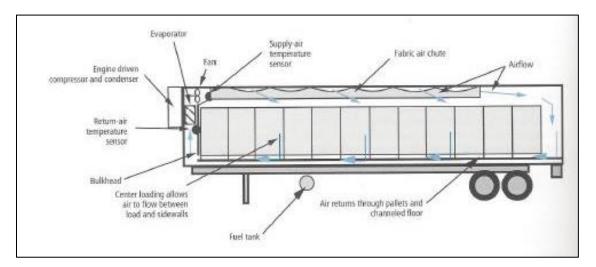


Figure 2: Courtesy of University of California Refrigerated Trailer Transport of Perishable Foods

# 7.8. Refrigeration Unit Operating Procedures – Post-Loading

It's imperative to <u>follow proper refrigeration unit operating procedures</u> when transporting refrigerated cargo.

After loading is complete, close the doors immediately, start the refrigeration unit and re-confirm the correct operating mode and set-point have been selected.

Initiate a manual defrost cycle to remove any frost or ice from the evaporator coil and to help ensure maximum cooling performance after defrost is completed. When defrost is complete, the unit should return to normal operation. The box temperature should then begin to return toward the 'desired' cargo temperature.

# 7.9. Trailer Post-Load Verification and Inspection

Once the trailer is loaded, a final review should be conducted before closing the trailer doors, including but not limited to the following components:

- Verify Bill of Lading (BOL) paperwork
- Verify all pallets have been loaded
- Verify Load Diagram
- Check load for proper airflow
- Check that bulkheads, load bars and straps are properly secured
- Close Trailer door, latch, lock and secure door seals

## 7.10. Securing the Loaded Trailers for Staging

The final step in the loading process is to safely move the trailer to the staging area of the yard. Typical steps to follow include:

- Raise dock plate
- Close dock door
- Ensure the dock light turns "Red"
- Proceed outside wearing a reflective safety vest
  - Remove glad hand lock
  - Remove wheel chocks
- Ensure any changes or special information for the driver is marked clearly on the load diagram
- Place load diagram into the route folder and turn-in to the supervisor
- Notify appropriate personnel that the trailer is now ready to be moved to the staging area

# 8. Staging Loaded Trailer Back On to the Yard

Next to the pre-cooling of trailers, the staging of trailers in the yard is of critical importance. The staging process allows for the trailer to re-stabilize the internal trailer temperature prior to delivery process. Stabilizing compartmental temperatures in the trailer helps to defer the loss of product temperature that may occur during the delivery process. The staging process also ensures security measures are in place to protect the load.

The shipper's PCQI is responsible for having specific requirements of the loaded trailer staging process documented in their FSP. Generally, the specific actions center on the following areas:

- <u>Verify the Loaded Trailer</u>: Once the trailer is ready for staging, verify that the trailer is properly loaded, locked and assigned to a route and cross-check that steps reviewed in Section 5.8 were completed.
- Verify the Refrigeration Unit Status: Ensure that the refrigeration unit was turned on after loading and set to proper requirements. Refer to the operating manual to ensure set point, mode of operation and modulation settings are correct and meet specific load and FSP requirements. Also, check the fuel level on the tank to ensure adequacy.
- <u>Securing the Trailer</u>: Install Door Seals, a commonly used tool to validate trailer security, in accordance with security compliance. Door seals have unique serial numbers or ID numbers that should be registered on each load. The basic principle is that if a door seal is missing or broken there may have been a breach of security by an un-authorized person and the load could be subject to tampering and/or theft. Door Seals should be installed on each door of the trailer.
- Moving the Trailer to Staging Area: Once ready, the trailer should be parked in its designated pick-up location so that the driver can easily pull-in, hook-up and drive off to begin the route.
   Its location should be reported to the Dispatch office as appropriate.

## 8.1. Monitoring of Staged Trailers

It is extremely important to monitor the trailers in the staging area. Physical security should be provided in the form of gates or guards, and real-time trailer monitoring is recommended, and now required by most shippers due to the approved FDA STF ruling.

Real-time telematics devices provide an excellent platform for monitoring trailers throughout the distribution process, including staging.

During the staging process, real-time electronic checks continually check:

- Fuel Levels
- Refrigeration Unit Settings
- Location/Position (GPS)
- Door Seals

If the trailer does not have real-time telematics devices installed, the security of the trailer and yard personnel should check its contents until the trailer is dispatched.

# 9. Departure and Arrival Process for Loaded Trailers

Departure and arrival procedures for loaded trailers will vary by site and are dependent on factors such as the physical layout of the campus, use of guard services, staging capabilities, and company policy. Ultimately, the PCQI at each facility is responsible for documenting the specific practices and procedures required in the facility's FSP. The documentation needs to be available and communicated with drivers/carriers and facility personnel to ensure compliance.

- Procedures should be documented and published in an approved facility FSP.
- Procedures should be reviewed regularly and updated as necessary to meet changing needs.
- Procedures should be made available to carriers prior to arrival to ensure a thorough understanding of requirements and to streamline processing time.

A sample Shipping Checklist has been provided in the Appendix of this document.

#### 9.1. Centralized Check In Location

The warehouse/facility should have a designated driver check-in location (sometimes an office or guard shack). In larger facilities, with more than one check-in location, care should be taken to provide sufficient signage that is visible, well-placed and offers clear instructions and guidance to assist drivers, ensure efficiency and mitigate security and safety concerns.

Arrival and departure procedures should be communicated to the driver/carrier prior to arrival to ensure all proper paperwork and required information is made available to prevent delays in the process. Notification of procedures can be accomplished through notes in EDI transmissions, via email confirmations, or through some other method during the load tender process.

All documentation such as Bills of Lading, Manifests, logs, etc. should be retained in accordance with local, company, and customer retention policies.

# 9.2. Arrival Procedures – Inbound, Outbound Carrier

Similarities may exist between arrival procedures of both inbound and outbound carriers at the site. While processes and procedures will vary from site to site, it is important that standardized procedures for inbound and outbound carriers be consistently followed. Copies of standardized documents should be provided to carriers in advance of arrival.

Sample Inbound and Outbound Arrival Procedure Checklists have been provided in the <u>Appendix</u> of this document.

#### 9.3. Departure Procedures – Inbound Carrier

Verification of the trailer being unloaded should be completed by facility personnel/management using documented on-site procedures, as per PCQI FSP. The carrier/driver should also verify that the load was properly unloaded and that only the freight destined for the site was processed (in the case of multi-stop loads).

Once verification of unload is complete, the driver is ready for release from the facility. The driver should proceed to the pre-determined check-out location. This is normally the same location as checkin, but if it is different, the driver should be made aware of this during the check-in process.

- The check-out personnel should retrieve any relevant and appropriate paperwork associated with the load during the check in procedure.
- The driver should sign any appropriate paperwork as necessary.
- Driver will be hand all appropriate paperwork, including a signed BOL, manifest, etc. as well as a gate pass if necessary.
- The driver is now clear for departure.
- The local site should update its logs and paperwork, note the time that unloading of the trailer was completed, as well as the time the driver was cleared for departure.

#### 9.4. Departure Procedures – Outbound Carrier

Verification of the trailer being unloaded should be completed by facility personnel/management using documented on-site procedures. The carrier driver should also verify that the load was properly loaded and secured in accordance with carrier requirements and site procedures and protocol, as per PCQI FSP.

Once verification of the trailer unload is complete, the driver is ready for release from the facility. The driver should proceed to the pre-determined check-out location. This is normally the same location as check-in, but if it is different, the driver should be made aware of this during the check-in process.

The check-out personnel should retrieve any relevant and appropriate paperwork associated with the load during the check in procedure. At a minimum, outbound paperwork should contain:

- Bill of Lading
- Loading Diagram
- Copy of Order
- Temperature Recorder Paperwork
- Any carrier control forms required

#### Before departing:

- The check-out personnel should validate that the paperwork is accurately and completely filled out.
- The driver will be handed all appropriate paperwork as well as a gate pass if necessary.
- The driver should sign any appropriate paperwork as necessary, including driver logs, bill(s) of lading, etc. and provided copies.
- The site will retain similar copies following corporate or local retention policies.
- The driver is now clear for departure.
- The local site should update its logs and paperwork, noting the time that unloading of the trailer was completed as well as the time the driver was cleared for departure.

#### 9.5. Post-Trip Inspection – End of Route

At the conclusion of the trip/route, drivers should conduct a post-trip inspection to verify the conditions of their vehicles. The standard Driver Vehicle Inspection Report (DVIR) for tractors and trailers are a good guide for post-trip inspections:

- Vehicle Conditions
  - ✓ Brakes
  - ✓ Electrical
  - ✓ Emergency
  - ✓ Engine
  - ✓ Instrument Panel
  - ✓ Refrigeration
  - ✓ Rear Axle
  - ✓ Steering
  - ✓ Transmission
  - ✓ Tires

### **10. En-Route Compliance Requirements**

Monitoring the trailer while in transit provides the operator with valuable information about the quality and performance of the trailer and the driver. According to the FDA's STF rule, unless a shipper takes other measures to ensure that adequate temperature control is provided during the transportation of food that requires temperature control for safety under the conditions of shipment, a shipper of such food must specify in writing to the carrier, and, when necessary, the loader, an operating temperature for the transportation operation. This includes the pre-cooling phase.

One-time notification shall be sufficient unless a circumstance such as the conditions of shipment changes, necessitating a change in the operating temperature. The information submitted by the shipper to the carrier is subject to STF record requirements (§ 1.912).

#### **10.1.** Compliance Requirements

The STF dictates that effective measures must be taken to ensure that food that requires temperature control for safety is transported under adequate temperature control. The shipper of food that requires temperature control for safety under the conditions of shipment must develop and implement written procedures, to ensure that the food is transported under adequate temperature control. Measures to ensure the safety of the food may be accomplished by the shipper or by the carrier or another party covered (as dictated by a written agreement).

In order to maintain proper product temperatures during transit it is imperative that the compartmental air temperatures are being monitored on a real-time basis. If the air temperature is properly maintained, the product temperature cannot go out of threshold specification.

The specific transport temperature requirements will vary by load and shipper, as per the approved FSP plan specification. It is imperative for carriers to review shipper requirements and ensure they are attainable and that the necessary technology is available to deliver.

#### 10.2. Data Collection

Data collection of real-time transit information requires the use of a Telematics device. Telematics devices in the cold chain industry will have GPS; GSM/GPRS; temperature and door sensors.

Depending upon the environment, the telematics units can be set to report every 5, 15, 30, 60 minutes or at any custom setting. Due to the importance of this data, it is recommended that data transmissions should be every 5 minutes but no longer than 15 minutes. Communications costs continue to come down each year and having access to more granular data allows for more frequent data, which provides more time to initiate potential corrective actions.

During transit, a Telematics unit will provide a host of information on regular intervals. Today's technology allows many options and customized settings to secure the data and information desired. Examples of the types of data that can be collected, saved and communicated real-time include:

- GPS location
- Reporting Time
- Compartmental Temperatures
- Product Temperatures
- Door Status (for security)
- Fuel Status
- Event Notifications
  - Temperature violations
  - Late Arrival violations
  - Out of Territory violations
  - Un-authorized Access

#### 10.3. Compliance Reporting

The results of each route/trip should be properly documented, saved electronically and available for online access. This compliance data should be integrated into the traditional route/trip report; however, other reports could be generated such as a:

- Trip Report
- Temperature Management Report
- Route Event Report
- Out of Territory Report
- Any many other customized reports

Actual reporting requirements are dictated by the shipper/PCQI FSP.

### **11. Load Acceptance Procedures**

The criteria and procedures for load acceptance should be written into individual FSPs by the shipper's PCQI.

Actions that should be specifically documented and need to be met by the carrier will ideally include:

- Visible assessment
  - Odors, product leakage, damage to containers, etc.
- Temperature requirements
  - What are the acceptable maximum/minimum temperature ranges of the particular load?
  - Was it maintained throughout transport? View required documentation/reports as dictated by shipper FSP
  - Is product in acceptable range at offload?
- The speed and efficiency of product unloading

- How quickly does the unloaded product need to be placed into an equivalent temperature controlled area?
- What timeframe is required to be met?

Receivers engaged in transportation operations have certain requirements according to the FDA STF ruling. Specifically, upon receipt of food that requires temperature control for safety under the conditions of shipment, the receiver must take steps to adequately assess that the food was not subjected to significant temperature abuse, such as determining the food's temperature, the ambient temperature of the vehicle and its temperature setting, and conducting a sensory inspection (i.e., off-odors).

If a receiver becomes aware of an indication of a possible material failure of temperature control or other conditions that may render the food unsafe during transportation, the person must take appropriate action including, as necessary, communication with other parties to ensure that the food is not sold or otherwise distributed unless a determination is made by a qualified individual, that the temperature deviation or other condition did not render the food unsafe.

Also as per FDA STF rules, a carrier must, once the transportation operation is complete -- and if requested by the receiver -- provide the operating temperature specified by the shipper. The carrier must also be prepared to, if requested by the shipper or receiver, demonstrate that the correct, shipper-requested temperature conditions were maintained during the transportation operation. Such demonstration may be accomplished by any appropriate means agreeable to the carrier and shipper, such as the carrier presenting measurements of the ambient temperature upon loading and unloading or time / temperature data taken during the shipment.

A sample Receiving Checklist has been provided in the <u>Appendix</u> of this document.

#### 12. Records Retention

According to the final FDA STF rule, the shipper and carrier can agree to a temperature monitoring mechanism for foods that require temperature control for safety. Carriers need only have to demonstrate that the requested temperature conditions were maintained upon request, rather than for every shipment.

There are a number of effective ways to ensure temperature control including a thermometer; temperature measuring device or temperature recording device and the FDA leaves those choices up to the shipper and the carrier. In the final rule, the demonstration must only be made if the shipper or receiver requests it, which is consistent with industry best practices and would likely only be done in situations in which it is suspected that there has been a material failure of temperature control.

**Shippers** must retain records that demonstrate that they provide specifications and operating temperatures to carriers and as a regular part of their transportation operations for a period of 12 months beyond the termination of the agreements with the carriers. They must also retain records of written agreements and the written procedures required for a period of 12 months beyond when the agreements and procedures are in use in their transportation operations.

**Carriers** must retain records of the written procedures for a period of 12 months beyond when the agreements and procedures are in use in their transportation operations. They must also retain training records for a period of 12 months beyond when the person identified in any such records stops performing the duties for which the training was provided.

Written agreements for any tasks assigned to ensure compliance requirements must be retained for a period of 12 months beyond the termination of the agreements by all parties. Shippers, receivers, loaders, and carriers must make all records available to duly authorized individuals when requested. The records must be kept as original records, true copies (such as photocopies, pictures, scanned copies, microfilm, microfiche, or other accurate reproductions of the original records), or electronic records.

#### 13. Conclusion

FSPs, which are a requirement of the <u>FDA's FSMA Preventative Controls for Human Food rule</u>, become effective September 19, 2016 for most businesses. FSPs are a defining aspect of the new FDA STF ruling, as they will be a shipper's documentation of required sanitary transportation of human and animal food. Carriers, loaders and receivers need to fully understand the requirements and their responsibilities, and be able to comply.

Maintaining pre-requisite process documentation will enable the carrier to support its position should claims or lawsuits arise out of the act of carriage. However, maintenance of records alone may not be enough to defend against all claims and suits. It is recommended that the carrier seek legal and risk management counsel prior to commencement of business to limit its exposure. It is also recommended that the carrier conduct periodic review of contracts and pre-requisites to ensure that the company is compliant with the latest regulations and good business practices.

# 14. Appendix

# 14.1. Trailer Inspection Checklist

CRITICAL INFORMATION:				
	Shipper:			
Facility Information:	Bill of Lading Number:			
	Unit Number:			
	Ship Date:			
	Ship To:			
	Inspector:			
	Today's Date:			
	Trucking Line:			
	Driver's Name (Optional):			
Vehicle Information:	Trailer License Number (Optional):			
	Trailer Number:			
	License Plate (State):			
	TRAILER OR CONTAINER INSPECTIO	N CHECK LIST:		
AREA	Ітем		Satisfactory Condition	
			YES	No
	Refrigerator Thermostat Properly Set			
Refrigeration	Refrigerator Unit Temperature Setting (Degree F):			Degrees
Unit	Refrigerator Unit Operational			
	Vents Closed/Open			
	Overall Trailer Condition			
	Floors Free of Rubbish, Product Residue or Insects			
Cleanliness	Walls Free of Product Residue and Tape			
	Drains Open & Unobstructed (Free Flowing)			
	Absence of Odor(s)			
	Ceiling Undamaged			
_	Air Delivery Chute Intact & Functional			
Condition	Door Seals Intact & in Good Repair			
Condition	Door Undamaged			
	Walls & Wall Insulation Undamaged			
	Floors in Good Repair			
FINAL RESULT:	SATISFACTORY FOR LOADING			
COMMENTS:				

14.2. Checklist for Properly Staging Property Staging Pro	roducts for Loading
☐ Verify Jacks and Forklifts are oper	rational
Use approved equipment	types for loading
☐ Battery and/or fuel levels	
Verify Temperatures with proper	y calibrated devices
Cool Dock environment	
Product pulping tempera	tures
Verify Load and Pallet integrity	
Ensure BOL and shipper requirem	
<u>=</u>	proper height and will not block normal airflow
	of products to be transported before loading
☐ Identify potential cross co	ontamination issues
Stabilize pallets	
Shrink-wrap pallets	A Conflict of Connection and Connection of C
Pre-position refrigerated product	
	ance of loading sequence based on product mix, delivery
schedule, or shipper requ	irements
Suggested steps include:	irements
	irements
Suggested steps include:	irements
Suggested steps include:  Secure the Glad Hand Locks	
Suggested steps include:  Secure the Glad Hand Locks Secure the Wheel Chocks Ensure the trailer is properly spot	
Suggested steps include:  Secure the Glad Hand Locks Secure the Wheel Chocks Ensure the trailer is properly spot Ensure that the dock door is not of	ted in the Dock Door opened until Trailer is spotted and secured
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Suggested steps include:  Secure the Glad Hand Locks Secure the Wheel Chocks Ensure the trailer is properly spot Ensure that the dock door is not of  Once the trailer is physically secured and Secure the Dock Door Seals Raise the Dock Plate Ensure the Dock Light is "Green"  Next, check the condition of the trailer complete the Dock Plate No Debris/ Obstructions Cleanliness Check (Free of pe	ted in the Dock Door opened until Trailer is spotted and secured in position, warehouse personnel should: before opening up the trailer door impartments and components: he Trailer st, microbes, etc.)

### 14.3. Trailer Loading Checklist

# 14.5. Shipping Checklist

CRITICAL INFORMATION:					
Customer Name:					
Customer Contac	t:				
Customer Phone:					
Customer Fax:					
	Purchase Order or Release Nui	mber:			
	Number of Cases or Units:	Number of Cases or Units:			
	Number of Different Items in L	Number of Different Items in Load:			
l       - f + !	Type of Loading (pallet, floor, s	Type of Loading (pallet, floor, slip sheets):			
Load Information	Temperature of Load (chilled o	Temperature of Load (chilled or frozen):			
	Estimated Arrival Time at Facil	Estimated Arrival Time at Facility:			
	Participating Pallet Exchange P	Participating Pallet Exchange Program?			
	Name of Carrier:				
ACTION ITEM:		RESPONSIBLE PARTY:	COMPLETED BY:	DATE & TIME:	
	PO or Release Number				
Obtain loading di	agram from customer				
Notify shipping do	ock of truck arrival				
Collect appropria	te paperwork from driver				
Collect appropria	te I.D. from driver (photo or copy of				
Driver's License)					
Document truck a	arrival time at plant				
Verify customer of	lata from table above				
Resolve any discrepancies in paperwork, notify customer of any changes					
Assign shipping d					
	te paperwork to shipping dock				
Enter data into database (if appropriate)					
	ition (cleanliness and odor) of the				
	nave driver take appropriate cleaning				
action(s) or contact the customer for additional					
direction					
	iler position at dock, verify that safety				
• •	been followed (wheel chocks, ICC				
bars, dock plate,					
Document any	trailer damage (insulation or door				
closures and seals	s)				
Verify that floor o	Irains are closed				
Verify that trailer refrigeration unit is running and that the trailer is pre-cooled					
Collect	Load Pick Up or PO number				
Appropriate Arrival time at dock					
Loading Data: Start time of loading					

	End time of loading					
Collect	Thermostat setting					
Appropriate	Number of pallets in the truck at					
Loading Data:	arrival (for pallet exchange					
	programs)					
Obtain proper product for shipment from warehouse						
or staging area						
	Verify case counts					
	Cross-check item codes (SKU)					
Cross-Check	Cross-check lot numbers					
Loading	Cross-check delivery and pick tickets					
Process:	Collect "catch" or "take" weights, if					
	required by the customer					
Cross reference	load information with Purchase Order					
(PO), correct any	/ discrepancies					
Request that the	e driver count the products submitted					
for shipment (O	ptional, if the driver is allowed on the					
dock)						
Have the driver	sign the delivery ticket					
Close the trailer	doors upon completion of loading and					
verification. If	the trailer is sealed, record the seal					
number						
Verify that all information on this form is correct,						
signatures and d	ate/time is entered.					
14.C. Auritral Dressedtures. Inharrad Caurier						
14.6. Arrival Procedures – Inbound Carrier						
Processes and procedures will vary from site to site; the following list is an example of commonly seen						
procedures.						
Upon arrival, driver proceeds to the pre-designated check-in location (Guard Shack, Office or						
Welcome Center)						
<u> </u>						
Check-In personnel obtains appointment number and the Bill of Lading (BOL) from driver						
Check-In personnel verifies that the driver is at the correct location						
• If	not, driver advised to contact his/he	er dispatch				
	so, procedure to check in procedure	•				
	• •					
<del></del>	Driver is "logged" into facility (electronic or paper/manual process).					
Colle	ct Information:					
□ c	☐ Carrier Name ☐ Trailer/Cab Numbers					

☐ DL/Identification Number

☐ Driver Name

☐ Arrival Time

Verify if a seal is required and presentInspect the trailer for seal

☐ Verify seal number against paperwork for match					
Note: If a seal is required but not present you should document exceptions on internal documentation (trailer inspection logs or other forms) and BOL (i.e. Broken, Missing, Invalid/No Match). Company, or Customer Specific procedures should be followed for dealing with exception, including but not limited to:					
<ul> <li>Contact the customer to determine handling requirements</li> <li>Determine if load should be accepted:</li> </ul>					
<ul> <li>If accepted, follow remaining arrival procedures</li> </ul>					
<ul> <li>If rejected, notify carrier/carrier dispatch and document accordingly</li> </ul>					
If the site is an appointment only site, then the check-in personnel should validate the driver's appointment					
If an appointment is verified, then driver should be assigned staging location (Dock Door, Drop Lot or Sit-Lot)					
If no appointment, then the driver should contact his/her dispatcher to verify					
Non-Appointment sites will follow similar procedures as above, but likely on a first-come/first-					
serve basis					
Any discrepancies or variations to expectations on the inbounding of the carrier should be noted with detail in the event of need for further follow up					
Upon completion of arrival process, staging and/or unload procedures will be followed					
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14.7. Arrival Procedures – Outbound Carrier					
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# 14.8. Receiving Checklist

CRITICAL INFORMATION:					
Customer Name:					
Customer Contac	t:				
Customer Phone:					
Customer Fax:					
		Purchase Order or Release Number:			
		Number of Cases or Units:			
Load Information:		Number of Different Items in Load:			
		Type of Loading (pallet, floor, slip sheets):			
	•	Temperature of Load (chilled o			
		Estimated Arrival Time at Facili	•		
		Participating Pallet Exchange Program?			
		Name of Carrier:	<u> </u>		
ACTION ITEM:		RESPONSIBLE PARTY:	COMPLETED BY:	DATE & TIME:	
Assign or record I	O or R	elease Number			
Obtain loading di	agram	from customer			
Notify shipping de	ock of t	ruck arrival			
Collect appropria	te pape	erwork from driver			
	te I.D.	from driver (photo or copy of			
Driver's License)					
Document truck a	arrival t	ime at plant			
Verify customer of					
Resolve any discrepancies in paperwork, notify customer of any changes					
Assign shipping door for loading					
Send appropriate paperwork to shipping dock supervisor					
Enter data into database (if appropriate)					
Verify the condition (cleanliness and odor) of the trailer. If dirty, have driver take appropriate cleaning action(s) or contact the customer for additional direction					
Ensure proper trailer position at dock, verify that safety procedures have been followed (wheel chocks, ICC bars, dock plate, etc.)					
Document any trailer damage (insulation or door closures and seals)					
Verify that floor drains are closed					
Verify that trailer refrigeration unit is running and that the trailer is pre-cooled					
Collect Load Pick Up or PO number					
Appropriate	Arrival time at dock				
Loading Data:	Start t	ime of loading			

	End time of loading		
	Thermostat setting		
	Number of pallets in the truck at		
	arrival (for pallet exchange		
	programs)		
Obtain proper product for shipment from warehouse			
or staging area			
	Verify case counts		
Cross-Check	Cross-check item codes (SKU)		
0.000 000	Cross-check lot numbers		
Loading Process:	Cross-check delivery and pick tickets		
Fiocess.	Collect "catch" or "take" weights, if		
	required by the customer		
Cross reference load information with Purchase Order			
(PO), correct any	y discrepancies		
Request that the driver count the products submitted			
for shipment (Optional, if the driver is allowed on the			
dock)			
Have the driver sign the delivery ticket			
Close the trailer doors upon completion of loading and			
verification. If the trailer is sealed, record the seal			
number			
Verify that all information on this form is correct,			
signatures and o	late/time is entered.		