

U.S. Transportation Industry Update



Sanitary Transportation of Human and Animal Food Rule

As part of an ongoing series, this report provides a brief overview of updates within the U.S. Transportation Industry. Quotes are included from established industry analysts and researchers to ensure comprehensive coverage of current and expected conditions.

Armada's Quality Assurance team ensures our clients and stakeholders are aware of potential and pending proposed legislation changes that impact food supply chain safety and works so that they are well-positioned for early compliance.

The Food Safety Modernization Act (FSMA) was signed into law on January 4, 2011. Since then, there have been seven proposed rules written in support of implementation of the law including the rule on Sanitary Transportation of Human and Animal Food (STHAF). The STHAF rule was published on April 6, 2016 and will be enforced for most on April 6, 2017 - with the exception of small businesses employing fewer than 500 persons and carriers having less than \$27.5 million in annual receipts having two years to comply.

STHAF Rule Highlights

STHAF applies to carriers, shippers, loaders and receivers who transport food in the U.S. by motor or rail vehicle.

- Carrier - a person who owns, leases or is otherwise ultimately responsible for the use of a motor vehicle or rail vehicle to transport food.
- Shipper - a person who initiates a shipment of food by motor vehicle or rail vehicle.
- Loader - a person who determines the transportation equipment is in appropriate sanitary condition and that each mechanically refrigerated cold storage compartment is adequately prepared for refrigerated transportation, including precooling, prior to loading the trailer.
- Receiver - a person who receives food after transportation, whether or not that person is the final point of receipt.

Armada ensures that our carriers are positioned to be in compliance with all new requirements that our clients' shippers, loaders and receivers are aware of the pending rule.

STHAF Requirements

- **Vehicles and transportation equipment**

The design and maintenance of vehicles and transportation equipment to ensure that it does not cause the food that it transports to become contaminated.

- **Transportation operations**

The measures taken during transportation to ensure food is not contaminated, such as adequate temperature controls and separation of food from non-food items in the same load.

- **Information exchange**

Procedures for exchange of information about prior cargos, cleaning of transportation equipment and temperature control between the shipper, carrier, loader and receiver, as appropriate to the situation.

- **Training**

Training of carrier personnel in sanitary transportation practices and documentation of the training.

- **Records**

Maintenance of written procedures and records by carriers and shippers related to transportation equipment cleaning, prior cargos and temperature control.

Key Carrier Requirements

- Carrier supplies equipment that is in sanitary condition.
- Carrier has written procedures to specify practices for cleaning, sanitizing if necessary, and inspecting vehicles and transportation equipment.
- Carrier precools equipment and demonstrates compliance to temperature control requirements as agreed upon in writing with the shipper.
- Carrier has written procedures that describe how it will comply with applicable provisions for temperature control during transportation.
- Carrier has a documented training program and maintains training records for a 12 month period.

Armada's carrier compliance audit program ensures that our carriers have implemented the appropriate protocols to be in compliance with food safety rules. Our carriers are required to provide food grade equipment that has temperature download capability. Armada provides our carriers with any precooling and product temperature control requirements as specified by our clients.

Armada has notified our carriers of our expectations for full compliance to the final rules. Our Quality Assurance team will continue to stay abreast of food safety legislation through the FDA and industry associations, and will continue to provide periodic updates to our carriers and shipper, loader and receiver stakeholders as this rule is enforced.

For questions regarding this legislation, contact Craig Rykaczewski, Quality Assurance at Armada, at (412) 447-6036 or crykaczewski@armada.net.

For more information about Armada's

Transportation Solutions, contact:

Meredith Neizer at (412) 447-6040

or mneizer@armada.net (or)

your assigned Armada Account Manager

Sources:

U.S. Food and Drug Administration, www.fda.gov

International Refrigerated Transportation Association

Transportation Intermediaries Association