

# QSPS Consulting LLC

Quality Safe Process Solutions – An Audit Readiness Consulting Group

**PRESENTED BY Carlos Romero**

*Audit Readiness for*

**SANITARY FOOD TRANSPORTATION ACT (SFTA)**

*Sanitary Transportation of Human and Animal Food Rule*

*"Sanitary Transportation Rule"*

October 17, 2018



# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Compliance**

- The final rule applies to shippers, receivers, loaders and carriers who transport food in the United States by motor or rail vehicle, whether or not the food is offered for or enters interstate commerce.
- Proposed rule: February 5, 2014
- Public comments: More than 200
- Final rule published: April 5, 2016
- “Now Law” – all compliance dates have passed

Source: FDA, [www.fda.gov](http://www.fda.gov)



# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Purpose of SFTA Rule**

The rule builds on safeguards envisioned in the 2005 Sanitary Food Transportation Act (SFTA). Because of illness outbreaks resulting from human and animal food contaminated during transportation, and incidents and reports of unsanitary transportation practices, there have long been concerns about the need for regulations to ensure that foods are being transported in a safe manner.

*Source: FDA, [www.fda.gov](http://www.fda.gov)*

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Purpose of SFTA Rule**

The rule establishes requirements for shippers, loaders, carriers by motor or rail vehicle, and receivers involved in transporting human and animal food to use sanitary practices to ensure the safety of that food.

Specifically, the FSMA rule establishes requirements for vehicles and transportation equipment, transportation operations, records, training and waivers.

Source: FDA, [www.fda.gov](http://www.fda.gov)

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Who is Required to Comply?**

- Shippers
- Loaders
- Carriers
- Receivers



*Source: FDA, [www.fda.gov](http://www.fda.gov)*

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Subject to SFTA Rule**

- Applies to shippers, loaders, carriers and receivers who transport food in the United States by motor or rail car. It also may apply to (but not limited to):
  - Foods transported in bulk (i.e. juice, animal feed)
  - Packaged foods not fully enclosed by container (i.e. fresh produce)
  - Food that require temperature control for safety

Source: FDA, [www.fda.gov](http://www.fda.gov)

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

**Shipper**

- **Arranges for the transportation of food in the United States by a carrier or multiple carriers**

**Loader**

- **Loads food onto a motor or rail vehicle during transportation operations**

**Carrier**

- **Physically moves food by rail or motor vehicle in commerce within the United States**

**Receiver**

- **Receives food at a point in the United States after transportation (whether or not final point of receipt for the food)**

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Key Requirement of SFTA Rule**

- Vehicle and transportation equipment
- Transportation operations
- Training
- Records



Source: FDA, [www.fda.gov](http://www.fda.gov)



# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Vehicle and transportation equipment**

- The design and maintenance of vehicles and transportation equipment must ensure that it does not cause the food that it transports to become unsafe.
- Vehicles and equipment must be suitable and adequately cleanable for their intended use and capable of maintaining temperatures, if necessary, for the safe transport of food.

Source: FDA, [www.fda.gov](http://www.fda.gov)

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Transportation operations**

- Controls, measures and procedures are in place to ensure food from becoming unsafe during transport such as:
  - Adequate temperature controls
  - Protection from cross-contamination from raw or by non-food items in same load
  - Protection from cross-contact (i.e. food allergens)
  - Bulk load protections with seals and locks

Source: FDA, [www.fda.gov](http://www.fda.gov)

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Transportation operations**

- Shippers must develop and implement written procedures adequate to ensure:
  - Vehicles and equipment are in appropriate sanitary condition
  - Previous cargo does not make food transported in bulk unsafe
  - Food requiring temperature control for safety is transported under adequate temperature controls

Source: FDA, [www.fda.gov](http://www.fda.gov)

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Transportation operations**

- **Loaders**: Must conduct inspection at loading (i.e. vehicle cleanliness, proper pre-cooling for temperature sensitive items, ensure no potential for cross-contamination, etc.).
- **Receivers**: Upon receipt, assess food for temperature abuse.
- **Carriers**: If agreed to by contract, demonstrate that shipping's operating temperatures requirements have been met and disclose identity of most prior bulk cargo and cleaning information.

Source: FDA, [www.fda.gov](http://www.fda.gov)

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Training**

- Requires rail and motor vehicle carriers covered by the rule to provide food safety training to their personnel engaged in transportation operations.
- This requirement applies when the carrier and shipper have agreed in a written contract that the carrier is responsible, in whole or in part, for the sanitary conditions during transportation.
- Carriers are required to establish and maintain records documenting the training of operations personnel.

Source: FDA, [www.fda.gov](http://www.fda.gov)

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Training Resource**

**FDA offers free training module for carriers covered by the Sanitary Transportation of Human and Animal Food Rule.**



**LINK:**

**<https://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm576097.htm>**

**Source: FDA, [www.fda.gov](http://www.fda.gov)**

# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Records**

- Written agreements or contracts between parties
- Written standard operation procedures (SOPs)
- Training records
- Records must be kept 12 months beyond when the procedures (or contracts/written agreements) are in use



Source: FDA, [www.fda.gov](http://www.fda.gov)



# **SUMMARY OF REQUIREMENTS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **SFTA Exemptions**

- Shippers, receivers, or carriers \$500,000 in annual revenue
- Transportation activities performed by a farm
- Shipments through the United States to another country
- Transportation of food that is imported for future export and that is neither consumed or distributed in the United States
- Transportation of compressed food gasses
- Transportation of human food byproducts transported for use as animal food without further processing
- Transportation of food that is completely enclosed by a container except a food that requires temperature control for safety
- Transportation of live food animals, except molluscan shellfish

Source: FDA, [www.fda.gov](http://www.fda.gov)



# **AUDIT READINESS FOR** **SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Next Steps: Identify Your Role and How does SFTA Affect Your Company**

- Shipper
- Loader
- Carrier
- Receiver

# AUDIT READINESS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)

## Shipper

### RESPONSIBILITY

- Provides specifications on requirements for shipping

### OPERATION/SOPs

- Equipment maintenance, temperature controls, cleaning and sanitation, prior cargo

### TRAINING

- All appropriate training records

## Loader

### RESPONSIBILITY

- Follow specifications during loading

### OPERATION/SOPs

- Loading and trailer inspections, staging, pre-cooling

### TRAINING

- Trailer inspections, temperature requirements

## Carrier

### RESPONSIBILITY

- Meet specification and communicates deviations when out of specification

### OPERATION/SOPs

- Equipment maintenance, temperature controls/monitoring while in transit, cleaning and sanitation

### TRAINING

- Safe food handling, food safety hazards, break down procedures, cold chain

## Receiver

### RESPONSIBILITY

- Verifies condition of loads, temperatures and trailer conditions

### OPERATION/SOPs

- Trailer inspections, reject and hold procedures

### TRAINING

- All appropriate training records

# **AUDIT READINESS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Tools to Managing SFTA Compliance**

### **Consulting and Data Collection Services**

- **Consultants familiar with FSMA Requirements**
- **Experts in Audit Readiness**
- **ReposiTrak**



# AUDIT READINESS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)

## Tools to Managing SFTA Compliance

### FDA Resources

- Web site: [www.fda.gov/fsma](http://www.fda.gov/fsma)
- To submit a question about FSMA, visit [www.fda.gov/fsma](http://www.fda.gov/fsma) and go to Contact Us



Source: FDA, [www.fda.gov](http://www.fda.gov)

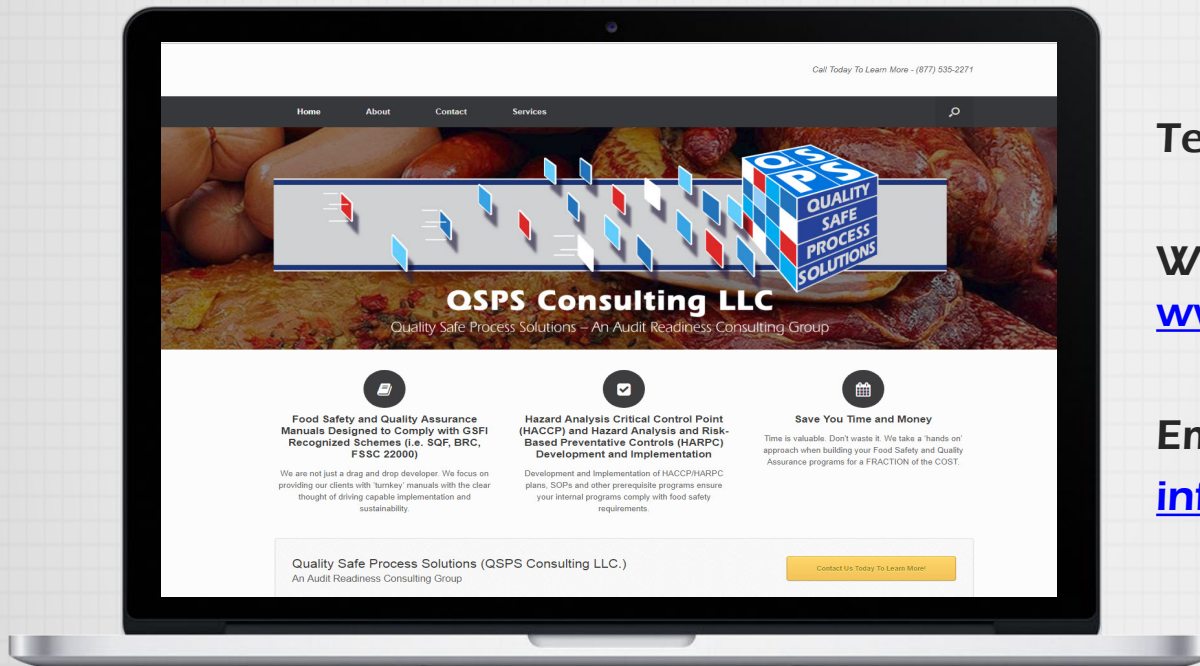
# **AUDIT READINESS FOR SANITARY FOOD TRANSPORTATION ACT (SFTA)**

## **Questions?**



# CONTACT DETAILS

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