

# 3<sup>rd</sup> Party Carrier Conveyance Guideline



## Introduction

Feed manufacturers are legally responsible for meeting various safety standards for the feeds they produce, yet they have no direct control over the ingredients they procure to make these feeds until the ingredients arrive at the facility. The purpose of this document is to provide information to shippers and 3<sup>rd</sup> party carriers about the safe transportation of ingredients and feeds intended for food-producing animals, to clarify who is responsible for what with respect to the regulations, and to provide a checklist feed mills can ask their suppliers and 3<sup>rd</sup> party carriers to follow when transporting ingredients and feeds.

## Regulatory Oversight

The manufacture and sale of feeds for food-producing animals is regulated in Canada. The various feed safety requirements are contained in the *Feeds Regulations* and the *Health of Animals Regulations*, which are administered by the Canadian Food Inspection Agency (CFIA).

The *Feeds Regulations* states that feed must be made from approved ingredients (i.e. listed in Schedules IV and V) and cannot contain anything that would be deleterious to the animals eating the feed, from both an animal health and a human food safety perspective. The regulations specifically do not allow feeds to contain veterinary drug residues (e.g. due to carryover from a prior shipment of medicated feed on a conveyance). In reality, CFIA inspectors view veterinary drug residues that may have a negative impact on human or animal health as being out of compliance.

In 1997 and 2007, additional restrictions on animal feed were added to the *Health of Animals Regulations*. These amendments were made in order to control the spread of Bovine Spongiform Encephalopathy (BSE) in the Canadian cattle herd. The feeding to ruminants (e.g. beef and dairy cattle, sheep, deer, goats, etc.) of BSE-infected ruminant-derived meat and bone meal has been identified as the primary cause in the spread of BSE. As such, the regulatory amendments include controls during manufacture and transportation of ingredients/feeds to prevent the cross-contamination of ruminant feeds with ruminant-prohibited material. 'Ruminant-prohibited material' is defined in the regulations and is essentially any protein-based ingredient derived from any mammal (except horses and pigs), with the exception of milk,

blood, gelatin, rendered fat, or their products. The amendments also require Specified Risk Material (SRM; the parts of the animal known to harbour the disease) to be removed at the abattoir and handled in a completely separate stream, to further mitigate the risk of exposure of ruminants to BSE. Any records that are required in relation to the handling of SRM, ruminant feed or ruminant-prohibited material must be kept for a period of ten years.

### **Safe Transport of Feed Products**

Most feed manufacturers would consider the “safe transport of feed products” to mean:

- no contamination of products intended for ruminants with ruminant-prohibited material
- the thorough cleaning and disinfection of a conveyance if it came in contact with Specified Risk Material
- no contamination from unsafe previous loads, for example:
  - veterinary drug residues from a previous load of medicated feed
  - ingredients not listed in Schedules IV and V of the Feeds Regulations
  - concentrated feed ingredients, such as minerals and feed additives
  - biological/chemical/physical hazards (e.g. salmonella, pesticide residues, broken glass, etc.)

### **Responsibilities:**

According to the CFIA, the shipper has the responsibility for their product, from production through to final point of delivery. The shipper should possess all of the required records, however if a 3<sup>rd</sup> party carrier is used some of the information may only be known by/reside with the carrier (e.g. previous load information, cleaning of the conveyance, unloading sequence, etc.). In these cases, the shipper is responsible for ensuring that the 3<sup>rd</sup> party carrier implements the shipper's standard, which would include the regulatory requirement for keeping certain records.

In order to ensure that the standard is being met by the 3<sup>rd</sup> party carrier, CFIA recommends that the shipper request the following:

- A written agreement from the 3<sup>rd</sup> party carrier to follow required standards
- "Letter of Guarantee" from the 3<sup>rd</sup> party carrier that they have followed the required standards
- Cleaning certificates, as applicable to carriers of SRM and otherwise for customer-specific requests
- Onsite inspection/audit of 3<sup>rd</sup> party carrier at shipping destination or cleaning station

### 3rd Party Carrier Conveyance Guideline Checklist

The following checklist contains criteria for the safe transport of feed products.

Criteria	Explanatory Notes	Compliance		Comments
		Yes	No	
1. Conveyances are suitable for the transportation of feed products.	<p>Clean, dry, water tight compartments; intact separating walls.</p> <p>Feed product contact surfaces are:                      - smooth, non-corrosive, non-absorbent and non-toxic                      - able to withstand repeated cleaning</p>			
2. Conveyances are not used for activities that could negatively impact the safe transport of feed products.	<p>If a conveyance is used to transport Specified Risk Material (SRM), it must be thoroughly cleaned and disinfected prior to transporting animal feed/ingredients.</p> <p>As per the <i>Health of Animals Regulations</i>, transporters of SRM must do so in accordance with a CFIA permit and the cleaning and disinfection of the conveyance must follow the requirements of Appendix 2 to the CFIA's BSE Manual of Procedures as follows:</p> <p>"Chemical decontamination of equipment and work surfaces with sodium hypochlorite (NaOCl) at a concentration of 2% available chlorine, or sodium hydroxide (NaOH) at a concentration of 2 Molars, is recommended. Surfaces and equipment should be left wet</p>			

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	(or soaking) with NaOCl or NaOH for at least one hour at 20 °C. Alternatively, a 5% concentration of phenol disinfectant DIN 02258943 (Environ LpH or Canadian LpH) has been documented to decontaminate metal contaminated with TSE agents when used for 30 minutes at 20 °C."			
3. Written conveyance cleaning procedures are appropriate for the safe transport of feed products, and specifically include precautions to prevent contamination of ruminant feeds with ruminant-prohibited material.	<p>Dry Cleaning:            (a) by vacuuming, blowing out or sweeping            (b) manual cleaning of areas not reached by (a)</p> <p>Procedures must cover from the time the product is received until it leaves the carrier's possession, care or control.</p>			
4. Bulk compartments have unique identification codes.	Allows for tracking of loading/unloading sequences. Method of identifying compartments is at carrier's discretion.			
5. Procedures exist for the segregation of recalled products during transportation.	Shipper's responsibility to label recalled products accordingly, and to notify the carrier of recall procedures.			
6. Accurate shipment records are available.	The shipper has the ultimate responsibility for their product, and should possess all of the required records. However if a 3 <sup>rd</sup> party carrier is used, some of the information may only be known by/reside with the carrier. In these cases, the shipper is responsible for ensuring that the 3 <sup>rd</sup> party carrier			

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	implements the shipper's standard, which would include the regulatory requirement for keeping certain records.			
7. Employees are trained in the safe transport of feed products. Evidence of training is documented.				
<b>Conveyance Loading:</b>				
8. Physically cleaning, flushing or sequencing of the compartment is required prior to loading if the previous load is/contains a ruminant-prohibited material or a veterinary drug, or is a concentrated feed ingredient, is not a Schedule IV/V approved feed ingredient, or as otherwise required by the shipper.  Conveyance compartment flushing/cleaning is recorded.	If the previous load was a ruminant-prohibited material, the records provided to the shipper must indicate as such [ <i>see criteria #10</i> ], and that the compartment was cleaned/flushed/sequenced.  Ideally, the records provided to the shipper should indicate the identity of the previous load and any cleaning steps taken. [ <i>Note: Some customers require this information.</i> ] If previous load information is not provided, the records must indicate that the compartment was cleaned prior to being offered for loading.			
9. Conveyance compartment has been inspected for cleanliness (e.g. free of odours and residues from previous loads) prior to being made available to shipper for loading.				
10. Ruminant-prohibited materials (and feed containing it) are identified on shipping documents.	Shipper's responsibility.  As per the <i>Health of Animals</i>			

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	<p><i>Regulations</i>, documents relating to products containing ruminant-prohibited material must contain the required <sup>1</sup>cautionary statement.</p> <p>Rendering plants must label ruminant-prohibited material with the cautionary statement, and must keep distribution records for all rendered products for 10 years.</p>			
11. Product overflow is prevented in multi-compartment conveyance during loading of bulk products.	<p>Shipper's responsibility.</p> <p>Contamination of ruminant feed with ruminant-prohibited material and the overflow of medicated feeds must be prevented.</p>			
12. For bulk multi-product loads, the loading sequence is recorded.	<p>*Shipper's responsibility.</p> <p>[* <i>When more than one shipper is using the same conveyance, it becomes the 3rd party carrier's responsibility.</i>]</p> <p>Demonstrates <sup>+</sup>safe sequencing practices were followed.</p> <p><sup>+</sup>As identified in the Health Canada/CFIA Drug Risk Profiling Project [<i>To be referenced in this standard when it becomes available.</i>]</p>			
13. Pallets are loaded to prevent damage and cross-contamination.	<p>*Shipper's responsibility.</p> <p>[* <i>If the 3<sup>rd</sup> party carrier moves the</i></p>			

<sup>1</sup> Cautionary Statement: "Feeding this product to cattle, sheep, deer or other ruminants is illegal and is subject to fines or other punishment under the *Health of Animals Act*./Il est interdit d'en nourrir les bœufs, moutons, cerfs et autres ruminants et des amendes ou autres peines sont prévues à cet égard par la *Loi sur la santé des animaux*."

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	<i>pallets within or onto another conveyance, it becomes their responsibility.]</i>			
14. Pallets containing damaged or defaced products that could cause cross-contamination are not placed into conveyances.	Shipper's responsibility.			
15. Conveyance (and compartment) ID and transportation date is recorded (e.g. on Bill of Lading).	Shipper's responsibility.  Facilitates tracing of product movement during a trace back investigation in a potential recall situation.			
16. The identity/amount of all products on the shipment is recorded.	*Shipper's responsibility  [* When more than one shipper is using the same conveyance, it becomes the 3rd party carrier's responsibility.]  Shipper should advise 3 <sup>rd</sup> party carrier if there are restrictions on co-shipments  Records of rendering plant products, ruminant feeds and ruminant-prohibited material must be kept for 10 years.			
17. Shipping documents contain destination address plus delivery details as warranted.	As provided by the shipper.			
18. If required by customer, seals are affixed to any access ports and seal numbers are recorded (e.g. on the Bill of Lading).	Shipper's responsibility.  Some customers may require seals on their shipments (case by case).			

Criteria	Explanatory Notes	Compliance		Comments
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<b>Conveyance Unloading:</b>				
19. Products/pallets are unloaded to prevent damage and cross-contamination.				
20. For bulk multi-product loads, the unloading sequence and any flushing/cleaning steps taken, are recorded.	<p>Demonstrates that +safe sequencing practices were followed.</p> <p>+As identified in the Health Canada/CFIA Drug Risk Profiling Project [<i>To be referenced in this standard when it becomes available.</i>]</p>			
21. Precautions are taken to prevent contamination of ruminant feed with ruminant-prohibited material during transportation and unloading of bulk feed, including compartment and on-board transfer equipment. Precautions taken must be documented.	<p>This is a requirement under the <i>Health of Animals Regulations</i>.</p> <p>'Precautions' include physically cleaning, flushing or sequencing (with a feed that does not contain ruminant-prohibited material) prior to unloading ruminant feed.</p>			

## Information Sources:

- Canadian Trucking Alliance's "Trucking Food Safety Program"
- Product Board Animal Feed's GMP B 4.1 "Animal Feed Road Transport"
- FeedAssure™ Generic HACCP Model and Prerequisite Program Manual
- CFIA's PRP Checklist for feed HACCP programs
- *Health of Animals Regulations* (Enhanced Feed Ban)
- *Feeds Regulations*
- CFIA's Pilot Compliance Verification Checklist, version dated January 17, 2008



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