



The proposed rule focuses on food safety practices during transportation activities. PHOTO CREDIT: K. SCHNEIDER, UF/IFAS

Safely transporting citrus

Proposed requirements of the Food Safety Modernization Act would affect Florida's citrus industry.

By Renée Goodrich, Keith Schneider, Michelle Danyluk and Mark Ritenour

The proposed sanitary transport of food requirements, under the Food Safety Modernization Act (FSMA), is built in part upon the 2005 Sanitary Food Transportation Act activities, the Food and Drug Administration's (FDA) previous guidance for safe transportation issued in April 2010, and guidance documents for good agricultural practices and good handling practices. The new rule takes a "prevention-based" approach, consistent with other foundational requirements resulting from FSMA rulemaking. In addition to this sanitary transport rule, FDA has proposed the following rules to address ongoing food safety concerns:

- Preventive control requirements for human food
- Preventive control requirements for animal food
- Standards for growing, handling, packing or holding produce/produce safety
- A proposed foreign supplier verification program for importers
- A program for certifying third-party auditors that conduct audits and certify foreign processing facilities and the foods they produce
- Mitigation strategies to prevent intentional adulteration of foods with the intent to cause widespread harm to public health

This article will address key aspects of the proposed Sanitary Transportation of Human and Animal Food FSMA rule ("the rule") and highlight potential situations relevant to the citrus industry.

GOAL AND SCOPE OF THE PROPOSED RULE

The proposed rule addresses the prevention of practices that create food safety risks during the distribution and shipment of human and animal foods. These include deficiencies such as failure to properly refrigerate food products, inadequate cleaning of vehicles between loads and failure to properly protect food during transportation. This proposed rule, with some exceptions, would apply to shippers, receivers and carriers who transport food in the United States by motor or rail vehicle. It also pertains to those entities, such as importers, that bring food into the United States that will be consumed or distributed in America.

WHAT DOES THIS MEAN TO THE CITRUS INDUSTRY?

While many citrus growers may not be directly affected by the sanitary transport rule, its implementation will certainly have an effect on several segments of the citrus industry. The proposed rule has several key requirements, outlined below, that should be considered.

Vehicles and transportation

equipment: The rule requires proper design and maintenance of vehicles and transportation equipment so they do not contribute to contamination of the citrus or feed product.

- For shippers of packed citrus, this means that cargo areas are properly designed using materials that are cleanable and in good condition.
- Cargo-area cooling systems should be designed to eliminate potential contamination of citrus from condensate drip.
- Bulk transport containers for shipment of fruit, culls and citrus pellets should be designed to empty properly and not accumulate water or debris after cleaning or use.

Transportation operation: These requirements include 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.

- The proposed rule covers processed products (e.g., fresh-cut, juice) that rely on adequate temperature control to prevent food safety hazards. Although temperature control is often required for quality management, that intent is not covered by this proposed rule.
- Packed citrus and other ready-to-eat citrus products should be segregated in the cargo area from other products and items that could serve as sources of contamination.
- Less-than-load shipments need adequate control measures



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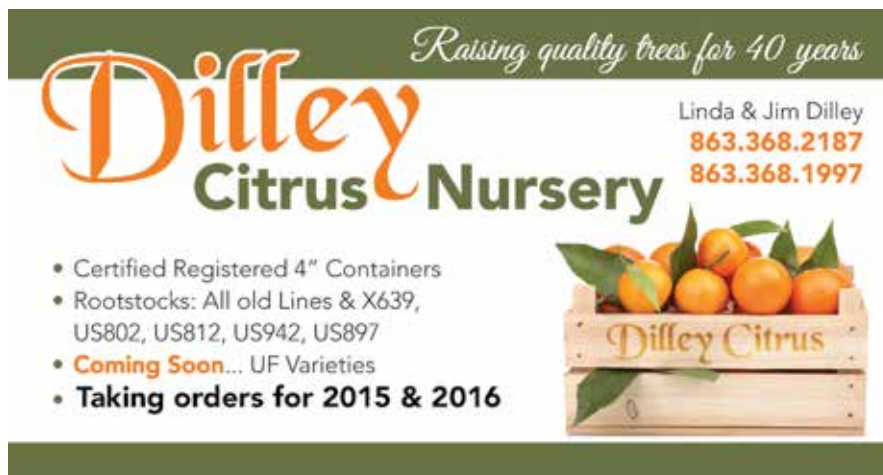
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(contract specifications, etc.) to ensure subsequent shipping activities do not compromise food safety of the partial shipment.

Information exchange: This includes procedures for exchange of information about prior cargos, cleaning of transportation equipment (method and date of cleaning) and temperature control between the shipper, carrier and receiver, as appropriate to the situation.

- Checklists for loading finished product should include inspection of vehicle sanitation and load records in order to determine suitability of a vehicle for transporting citrus products.
- A carrier transporting bulk liquid non-dairy foods such as juice would want to ensure that vehicles that have previously hauled milk will not introduce allergens into non-dairy foods through cross contact.

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

- Packers of fresh citrus should properly train loading dock and other involved employees in the proper evaluation of shipping vehicles and shipping records.
- Loading procedures should be evaluated for proper sanitary practices as part of packinghouse preventive measures programs. For example, procedures should be implemented to prevent cross-contamination due to forklift traffic during the vehicle loading process.

Records: This includes maintenance of written procedures and records by carriers and shippers related to transportation equipment cleaning, prior cargos and temperature control.

- The development, use and storage of records related to shipping and transportation of citrus products and responsibilities for such should

be clearly articulated between the shipper/packer and the transportation company.

- Records should be stored such that they can be readily retrieved upon request from auditors or regulators.

COMPLIANCE DATES

Current information from FDA indicates the proposed rule will be finalized in March 2016. Compliance with the rule is tiered, depending on the size of the business. Those businesses, other than motor carriers who are not also shippers and/or receivers, employing fewer than 500 persons and motor carriers having less than \$25.5 million in annual receipts will have two years after the final rule to comply. All other businesses, not excluded from coverage, will have one year after publication of the final rule to comply. It is FDA's intent that all producers, handlers and transporters of food should be trained in basic food safety practices whether excluded from coverage or not.

MORE INFORMATION

It is important for the citrus industry to stay informed about proposed rules and guidance that are developed as a result of FSMA. Specific information about food transportation and sanitation guidance and regulations can be found on FDA's website (www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformationSanitationTransportation/ucm203420.htm). Visit www.fda.gov/FSMA for the most current information and details about FSMA and to sign up to receive future FSMA updates. 🍊

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