



**National Grain and Feed Association**

www.ngfa.org | ngfa@ngfa.org

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# **NGFA Guidance on Ensuring Safety of Animal Food During Transportation**

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**National Grain and Feed Association**

**1400 Crystal Drive, Suite 260**

**Arlington, VA 22202**

**(202) 289-0873**

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## Introduction

The U.S. Food and Drug Administration's (FDA) rule for [Sanitary Transportation of Human and Animal Food](#) establishes a variety of requirements for shippers, loaders, carriers, and receivers engaged in the transportation of human and/or animal food by truck or rail to use sanitary transportation practices to ensure food safety. This rule provides considerable flexibility when meeting requirements and allows the use of industry best practices to ensure that food, e.g., grain and feed products, are transported under conditions and controls necessary to prevent food safety issues.

As defined by FDA, the term "animal food" means articles used for food or drink for animals and articles used for components of any such article. Thus, animal food includes both livestock feed and pet (companion) animal food, and grains and other ingredients that are intended for use in animal food.

FDA's rule for [Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals](#) (Animal Food Rule) also establish requirements related to the transportation of animal food. As an example, FDA's rule obligates receiving facilities to examine shipping containers and bulk vehicles to determine whether contamination or deterioration of inbound ingredients or other animal food has occurred during transportation.

In addition, FDA's [bovine spongiform encephalopathy \(BSE\)-prevention regulations](#) establish requirements for firms distributing grains or other animal food intended for consumption by cattle or other ruminants to implement practices to ensure these products are not cross-contaminated with prohibited mammalian protein products.

The purpose of this document is to provide a concise overview of certain topics associated with ensuring the safety of animal food during transportation. It addresses issues related to: 1) receiving of grains and other animal food ingredients by facilities; and 2) distribution of finished animal food from facilities. The document does **not** address all the requirements established by FDA's rules. Please refer to FDA's regulations for more detailed information.

Following is information on certain topics associated with the safe transportation of animal food.

## Assignment of Management Responsibility and Training

Facilities should designate appropriate supervisory-level personnel to ensure compliance with applicable regulatory requirements. The supervisory personnel are to have the education,

training, or experience (or a combination thereof) necessary to supervise the safe production and/or transportation of animal food.

Although FDA's Sanitary Transportation Rule only requires carriers (a person who physically moves food by rail or motor vehicle) to provide documented training to its personnel when it has contractually agreed to take on responsibility for sanitary transport conditions, it is good practice that all personnel involved in food transportation activities be trained to effectively perform assigned duties.

To assist in meeting the carrier training obligation established by the Sanitary Transportation Rule, FDA has made available a [video](#), accessible free of charge, to help carriers when conducting training. The one-hour video provides basic food safety training for transportation operations personnel. The video does not describe specific operating procedures and practices and is intended to complement industry best practices.

In addition, FDA's Animal Food Rule requires all individuals involved with the manufacturing/processing, packing or holding of animal food to be qualified to perform their assigned duties. To be qualified, these individuals are to receive documented training (commonly referred to as "qualified individual training") before beginning work. FDA also expects refresher training to occur periodically.

Qualified individual training may be provided by facility personnel, an external source, or a combination of both. Training may be provided by any reasonable means, for example, on the job, in a classroom setting, or online. For individuals involved in transportation activities, the qualified individual training should address the procedures and practices used by the facility to avoid contamination or deterioration of products during transportation. This could include how to evaluate the condition of shipping containers and bulk vehicles, ascertaining prior loads to determine acceptability, review of clean-out information, criteria to be used to accept and/or reject loads, and other topics.

Although neither the Sanitary Transportation Rule or Animal Food Rule mandate a frequency for refresher training, it is good practice to consider providing refresher training on an annual basis, or whenever a new or revised policy is implemented, or whenever it becomes apparent that an individual does not fully understand assigned duties.

## **Suitability of Vehicles and Transportation Equipment**

Shippers (a person who arranges for the transportation of food) should establish in writing what constitutes a suitable design and material for vehicles and transportation equipment so as to prevent food from becoming unsafe during transportation. As appropriate, shippers should

communicate in writing with the other entities involved in the transportation activity (e.g., carriers, loaders, etc.) the necessary design and material for vehicles and transportation equipment.

In general, the design of vehicles and transportation equipment for animal food products should provide: 1) walls, ceilings, and floors that are free of any sharp projections such as nails, staples, wire cables, etc., that could lead to contamination; 2) interiors of conveyances used to transport bulk food that minimize the accumulation of food and facilitate adequate discharge and clean out; 3) a water tight transportation environment; 4) doors, hatches and tarps that are tight fitting and provided with gaskets where appropriate; and 5) as appropriate, apparatus for doors, hatches and tarps that facilitate the use of seals to ensure the integrity of the food (***note: FDA's rules do not require the use of seals during transportation activities***).

In addition, storage conditions for vehicles and transportation equipment should be considered and necessary specifications communicated to other entities (e.g., carriers) as appropriate. When determining such conditions, factors that could be considered include: 1) length of time since last prior cargo; 2) the need for the use of seals to ensure the integrity of the vehicles and transportation equipment; and 3) use of fumigants, which should only be used in accordance with requirements of the pesticide label and at the receiver's discretion.

## **Preventing Unsafe Contamination During Transportation**

Shippers should develop written procedures adequate to ensure that vehicles and equipment used in transportation operations are in appropriate sanitary condition for the transportation of the animal food product. These procedures should be communicated to other entities as appropriate.

The written procedures should include practices to ensure that a previous cargo does not make a subsequent bulk product transported on the conveyance unsafe. To do so, shippers should consider including practices related to prior cargoes and prior clean-out. Following are some suggested practices to consider related to prior cargoes and prior clean-out.

- **Prior Cargoes:** The prior cargo hauled should be identified and conform with a list of products deemed to be acceptable (***note: FDA's rules do not prohibit the hauling of non-food products with conveyances that also are used to haul food products***).

U.S. regulations at 21 CFR 589.2000 and 2001 should be considered when determining acceptable prior loads when prevention of BSE is of concern.

Other products that **potentially** may be undesirable as prior loads include: 1) coal; 2) fertilizer; 3) glass; 4) gravel/sand/stone; 5) ground rubber; 6) heavy metals; 7) herbicides or pesticides; 8) industrial or municipal waste (garbage); 9) manure; 10) medicated feed; 11) metal scrap or shavings; 12) treated seed; 13) weed seed; and 14) wood. Facilities may determine that other types of products not listed above are undesirable.

If the prior load is determined to be unacceptable, then the conveyance could be rejected, or prior clean-out information should be evaluated before accepting or using the conveyance.

- Prior Clean-Out: As appropriate, the prior clean-out information should be available for review and conform with appropriate cleaning methods. Examples of adequate clean-out methods may include: 1) dry cleaning via vacuuming, sweeping and/or blowing out with compressed air; or 2) washing with water and cleansing agent; or 3) when dedicated vehicles or transportation equipment are used, organoleptic inspection (e.g., sight, smell).

Adequacy of prior clean-out may be verified by organoleptic inspection or wash ticket documentation.

Loaders (persons that load food onto a conveyance) should determine the vehicle or transportation equipment is acceptable prior to loading food onto a vehicle or into transportation equipment considering, as appropriate, any specifications provided by the shipper and information about prior loads and prior clean-out. Under FDA requirements, loaders have an obligation to evaluate the conveyance to confirm that its condition will not lead to the unsafe contamination of the product being shipped.

Receivers (persons who receive food after transportation) should examine shipping containers and bulk vehicles to determine whether contamination or deterioration of inbound ingredients or other animal food has occurred during transportation. If it is determined that unsafe contamination or deterioration has occurred, the product should be rejected or repurposed to an acceptable use.

## **Ensuring Safety When Receiving Spot Loads**

Receiving truck spot loads (loads that arrive at the facility with no prior communication with the supplier) may present a challenge in that necessary sanitary transportation practices may not have been communicated to the supplier/carrier prior to the load arriving at the facility. To address this type of situation, consider: 1) requesting prior load/prior clean-out information for the conveyance from the driver to determine acceptability and documenting the response; and/or 2) communicating requirements to the driver and documenting an acknowledgement

that requirements are satisfied; and/or 3) implementing additional inspection procedures to ensure the integrity of the load, e.g., visual inspection of material/initial discharge from the truck, etc.

## **Establishing and Maintaining Records**

FDA's Sanitary Transportation Rule does not require that records be established and maintained to demonstrate that written procedures related to transportation activities are being followed. However, it is good practice to do so by maintaining documentation on prior loads/prior clean-outs, conveyance inspections, etc. The rule does require that records for the written procedures developed to ensure sanitary transportation are to be maintained for a period of 12 months beyond when the procedures are in use. In addition, records related to required carrier training are to be established and maintained for a period of 12 months beyond when the person identified in the record stops performing the duties for which the training was provided.

In addition, FDA's Animal Food Rule requires all individuals involved with the manufacturing/processing, packing or holding of animal food to be qualified to perform their assigned duties. To be qualified, these individuals are to receive documented training, with records associated with the training retained for at least two years after the date they were prepared.