

STANDARDIZATION OF TANKER WASH PROTOCOLS AND WASH STATION AUDITING

In the United States, we have long been accustomed to accepting our systems of food production and distribution as being the best in the world. Our foods are wholesome, safe, and secure. Recent events have brought greater attention to activities that verify and improve our ability to produce and distribute wholesome, safe and secure foodstuffs both domestically and throughout the world.

From 'farm to table', food production and related industries in the United States accept the responsibility of providing the highest quality, the greatest efficiencies, and the highest standards of safety and security. Within this chain of custody, food materials are subjected to multiple transfers of these responsibilities - from the farm to the manufacturer/processor, from the manufacturer/processor through the distribution networks to retailers, and from the retailers to the consumers.

In the citrus juice industry, and for many other juices, beverage, and liquid foods industries, these multiple steps of transportation among food handlers are key issues in addressing food safety. The production of safe and sanitary citrus juices in Florida is affected by several state and federal regulations and requirements, in addition to compliance with rigorous company-level standards.

Under these rules, the safe and secure movement of products from manufacturer to consumer requires that the transportation mechanisms employed maintain the sanitary conditions that are achieved at multiple points of processing and/or production. The transport vehicles involved in these movements must be maintained, cleaned, and sanitized in a verifiable manner that prevents the introduction of unsanitary or unsafe conditions.

Historically, individual processor/manufacturing facilities have imposed protocols, requirements, and audits on the facilities responsible for cleaning the transport vehicles, primarily tankers. Through the years, these individualized programs and requirements have created inefficient, sometimes contradictory, situations. The costs of these programs, the costs of auditing these programs, and the lack of consistent verifications of the efficacy of these programs, have generated concerns that the system as a whole needs to be streamlined and/or standardized. Current auditing activities have provided awareness that program validation does not exist that establishes standards for the maintenance of sanitary conditions during tanker washing/sanitizing activities. Outside of the citrus industry, and outside the state of Florida, the procedural differences and non-standardized washing/sanitation requirements create a particularly troublesome scenario.

What is needed is an industry-generated 'single voice', calling for and supporting a set of standardized procedures and standardized audits that may be required of all transport cleaning and sanitation facilities throughout the nation. This standardization must include details of protocol, methodology for compliance, support originating from both juice/food industries AND transportation industries, and compliance with regulatory requirements.

All food grade tankers must be constructed in accordance with existing regulations. The only tankers acceptable for hauling food-grade materials are those dedicated to hauling food-grade materials. Another key concern is the cleaning and sanitation of food-grade tankers in the same facilities that provide cleaning services for tankers that are not food-grade. It is imperative that the equipment and supplies used to clean and sanitize food-grade tankers be dedicated to food-grade tankers. The construction of facilities must not allow any cross-contamination, actively or passively. Personnel must be trained and qualified to apply standardized protocols, and to understand the regulatory and conceptual requirements of proper tanker washing protocols. Management must be dedicated to addressing food safety and food security issues, as well as compliance with regulatory requirements.

To address these issues, a group of Florida industry representatives from both large and small citrus juice and beverage companies, representatives from tanker transport and tanker wash facilities, microbiological scientists, and food safety auditors have reached consensus on a set of standardized tanker wash protocols. The intention of these standard protocols is to provide a uniform and consistent mechanism for achieving nation-wide compliance with tanker cleaning requirements. This uniformity is to be applied by the beverage (and other food) industries, the tanker wash facilities, and the entities providing auditing functions. These procedures and protocols are designed to meet existing regulatory requirements and to ensure the degree of food safety and food security necessary to produce and distribute the safest foods in the world.

The tanker wash protocols that are supported by this industry group are commonly referred to as the 'Tanker Wash Guidelines' developed by a task force of the Juice Products Association (JPA), formerly known as the National Juice Products Association (NJPA). Published in 2002, the "JPA Model Tanker Wash Guidelines for the Fruit Juice Industry" defines terms, describe wash protocols in terms of the most recently hauled product type, and include a list of acceptable food materials that may be transported by food-grade tankers. Within that list of acceptable food types are also listed some of the materials that are not permitted to be carried by food-grade tankers.

In further support of the standardization of wash protocols, the Florida Citrus Processors Association (FCPA) developed Standard Audit Forms that promote consistent and effective auditing. These Standard Audit Forms and the protocols for their use are based primarily upon tanker wash facility requirements as described by the JPA Tanker Wash Guidelines, and by the regulatory requirements imposed by the FDA's 'Juice HACCP Rule', 21 CFR Part 120. The Standard Audit Form is available on this Web site by clicking on "Standard Audit Form" in the Documents Archive.

A group of trained auditors perform audits based upon these Standardized Audit Forms, and also qualify and approve third party auditors. Approval requirements include agreements to utilize the Standard Audit Forms and protocols, and support of the JPA Tanker Wash Guidelines. A roster of approved auditors is available by on this Web site under the heading, "Approved Auditors".

Audited tanker wash facilities will be rated on a basis of "Meets Requirements", "Meets Requirements with Conditions", and "Does Not Meet Requirements". Auditors will be allowed discretion in providing conditional approval of a facility's cleaning service activities, and will impose time limits for achieving 'Meets Requirements' status.

A "Meets Requirements" or "Meets Requirements with Conditions" rating is necessary for a tanker cleaning service to continue doing business with companies adhering to the requirements of the standard protocols. If a facility "Does Not Meet Requirements", it will be necessary to acquire, or re-acquire, a rating allowing resumption of business. A facility will have to make necessary corrections to items not meeting standards, and then arrange for a verification audit.

The Standard Audit Form has five audit categories - "Food Safety & Compliance", "Security", "Process Control", "GMP Compliance", and "Documentation & Systems". Within each category, several sections and subsections describe audit items; each audit item is categorized as "Critical", "Major", or "Minor". Failure to meet standards for any items identified as "Critical" will result in audit failure, and loss/withholding of the "Meets Requirements" rating. Failure to meet standards for items identified as "Major" may result in failure of the audit at the auditor's discretion, depending upon the number and nature of failures.

At the discretion of the auditor, a time limit for re-establishing compliance with standards for "Major" items may be imposed and a "Meets Requirements with Conditions" rating may be provided that allows a continuation of business. An unannounced verification audit will be carried out within the time frame for corrections. Failure to meet standards within the imposed timeframe will result in the loss of "Meets Requirements with Conditions" rating, and imposition of a rating of "Does Not Meet Requirements".

Failing to meet the standards for items identified as "Minor" will not generally be considered as grounds for audit failure. However, failures to meet standards for "Minor" items, coupled with significant numbers or types of failure in the "Major" items may be considered cause for failure, or 'conditional' approval at the auditor's discretion.

Facilities that have been audited successfully within the last eighteen months, and that have a rating of "Meets Requirements", or "Meets Requirements with Conditions" will be added to a database of successfully audited tanker washing facilities. Only those facilities that have been successfully audited by an Approved Auditor will be allowed continuation of business with the industry companies requiring the use of these Standardized Tanker Wash Protocols and Standardized Audits. Only facilities receiving a rating of "Meets Requirements", or "Meets Requirements with Conditions", will be included as approved tanker washing facilities and published on this Web site. The published data will show the name of the tanker wash facilities, audit rating, location(s), name of the auditor(s), and the effective date of the audit.

The establishment of standardized tanker wash protocols, and standardized auditing protocols represents a consensus among representative of the citrus, juice, and beverage industries. Standardization of auditing format, protocols and requirements, provides both industry and third-party auditors an avenue for communicating the successful compliance of those tanker wash facilities documented as meeting these standards. Standardized protocols provide a consistent, reliable, and verifiable mechanism for addressing food safety and security concerns associated with tanker transportation. Standardized wash protocols based upon documented food safety systems, risk analysis, and HACCP principles provide the tanker wash industry a reasonable expectation of consistency in industry demands and requirements.

The utilization of standardized protocols, and the publication of the names of compliant tanker wash facilities and approved auditors, provide tanker wash facilities, juice/beverage transport companies, juice processors and suppliers, and auditors a reliable and consistent method for achieving safe and sanitary juice and beverage transportation. This approach is a necessary next step for those in the citrus and juice beverage industry that share the responsibility for achieving 'farm to table' food safety.