



THE VOICE OF FOOD RETAIL

Feeding Families  Enriching Lives

To: Legal e-Share, Food Protection Committee, Supply Chain Council
From: Erik Lieberman
Date: March 8, 2012
Re: Inspection/Enforcement of DC to Store Transportation Practices

We received several responses to the below e-share inquiry. None of the retailers responding noticed an increase in inspection or enforcement in the states mentioned.

The member is encountering increased inspection/enforcement pertaining to food being transported between the distribution centers and the stores. The inspections have occurred at the delivery docks at the stores. The inspectors' focus has been on how food is loaded and separated in the trucks. The member's trucks contain non-food merchandise as well as packaged, fresh and frozen foods. The member has tried a couple of methods to separate perishables from other foods or "hazardous" (per FDA Food Code) products. The inspectors are not providing specific guidance on how the separation should be best achieved.

- 1) Do you use a best practice to load and segregate perishables from other food products or "hazardous" products (per FDA Food Code)?
 - 2) If so, what is the best practice you use?
 - 3) Have you noticed an increase in inspection/enforcement action in this area in the states of FL, CA, TX and AZ?
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One retailer has best practices for several categories:

Our transportation best practices are as follows for Frozen, Dairy, Meat / Seafood and

Prepared foods:

- These perishable warehouses are set all in a row where frozen food would be loaded first on the trailer with a bulkhead at the end of last skid then the truck would be moved down to our fresh warehouse and loaded with dairy, prepared foods or meat / seafood products. That is all that is ever placed on these trucks. All our seafood is placed in blue enclosed cabinets and placed at the tail end of the truck.

Our transportation best practices are as follows for Produce:

- Our produce warehouse will only load produce first, then possibly bakery ingredients, commercial bread racks, or egg racks depending on available room on the trailer.

Our transportation best practices are as follows for Grocery:

- Our grocery warehouse will only ship grocery items and possibly commercial bread racks only if there is an overflow where they would not fit onto the produce truck. Our hazardous materials would only consist of household cleaning chemicals which are shipped strictly on the grocery trucks with no perishable items.

One retailer responded that they use slip sheets to separate raw from RTE foods, as well as raw foods with different cooking temps. Also, DC's are profiled in such a way that the natural order filling process, minimizes the segregation risks and the required use of slip sheets.

One retailer ships on three different type of trucks: dry grocery, refrigerated, and frozen. With refrigerated, they have three types: dairy, produce, and meat/seafood/deli.

- The retailer employs the following best practice: "Hazardous" products must be shipped separate from food. This means either below food on the same pallet, or it could also be on a separate pallet. This includes items that could ultimately be used as food packaging or a food container --- they too must not be in a position to be contaminated. Examples here include Windex above paper towels.

One retailer noted that it is important to keep in mind that the FDA Food Code does not regulate distribution centers.

The retailer stated that items are slotted in the distribution centers such that when they are selected and palletized for shipment to our stores that chemicals/cleaners, etc. are not on top of food products, paper goods or packaging materials. Perishable products are also slotted in the distribution center to allow for appropriate selection of products. However, boxed beef will be the base of the pallet and some other perishable items such as chicken may be stacked on top of beef for shipment to the stores. This would be against food code since the cooking temperatures are different for the type of product, however all products are packaged in such a manner to prevent leaking. If leaking product is found in the DC then it will be removed and not allowed to proceed to the store.

The retailer slots goods in the order they will be selected for shipping to the stores.

We received several responses from the Supply Chain Council:

- We ship exclusive perishables loads. We do not ship perishables with anything but perishables. We do use bulk head doors to keep frozen from refrigerated. This may be something they could consider to keep perishables clearly separated from non-foods if they are shipping them together.
- We use pretty basic controls. We try to segregate products by slotting and selecting items that require "special treatment" together. When we load trucks we ensure products that can't be combined are separated either by not loading them together or placing banana bags over the product to create a barrier. We use multi temp trailers, freezer boxes and bulkheads to keep temperature compliance.
- We ship frozen, refrigerated, and dry grocery all on separate trailers. We also segregate products by slotting and selecting items that require "special treatment" together. We also use bags for product segregation during shipping. We don't ship in the states listed.
- Majority of time we do not ship fresh/refrigerated product with Grocery/Dry. When we do, we use bags, bulkheads, and loading sequence for product segregation in transport.
- Perishable products are stored and pulled according to the product type and storage temperature requirements. When Perishable warehouse loads a trailer of chicken product it is always placed on the bottom of the pallet. Organic product is stacked on top of the pallet with a slip sheet placed between the non-organic products. Frozen product is placed inside a bunker box and loaded in the nose of the trailer. We have noticed an increase in inspection/ enforcement action in Texas.
- The nature of how we have warehouses segregated, keeps us from combining toxic type items with "fresh" or perishable. Even when we "merge" warehouses together, nothing toxic would ride with perishable. Even the dry (dry) grocery goods are separated in warehouse from the "toxic" products and are not slotted together. We have not seen any action from enforcement agency on this matter(s).
- We ship frozen, refrigerated, and dry grocery all on separate trailers. We also segregate products by slotting and selecting items that require "special treatment" together. We don't ship in the states listed. The real difference is we do not regularly use bags to further create any separation.
- We are similar to response above, except we do not use multi temp trailers.
- We separate soaps and caustic items in the warehouse away from food items and select it separately, and keep separate at loading. If it has to be combined, we place caustic on the bottom separated by a cardboard or plastic slip sheet. We do use multi temp trailers and bulkheads for separating different temp products. We have not yet seen any increased scrutiny at our California DC.