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CODE OF PRACTICE FOR THE CARRIAGE OF EDIBLE OILS AND FATS IN ROAD TANK CARS

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CODE OF PRACTICE FOR THE CARRIAGE OF EDIBLE OILS AND FATS IN ROAD TANK CARS

1. INTRODUCTION

This Code contains the minimum requirements and recommendations for bulk transport of edible oils and fats in road tankers for the safety, hygiene, product integrity, quality and security of the products in transit.

SCOPA members agree to follow this code, which enforces but is not limited to the requirements of current applicable UK and EU legislation. As such SCOPA members agree to ensure that the hauliers they use are conversant with all relevant legislation, as well as the requirements of this Code and that their drivers are also aware of their responsibilities in this regard.

Under current legislation it is a requirement that food businesses have a HACCP programme in place.

2. SCOPE

Tankers shall be dedicated to foodstuffs only. This covers all relevant tanker operations including, without limitation, wash standards, loading, and the transportation and delivery of edible oils and fats by road within the UK that fall within this Code.

Products covered include all edible oils and fats, crude and refined, including acid oils and fatty acid distillate, which are destined for human consumption either directly or indirectly or for incorporation in animal feeds.

3. APPROVED HAULIERS

SCOPA members agree only to use hauliers who they have approved as able to meet the requirements of this Code and such approval shall be subject to regular review and audit. Audit procedures are detailed in Appendix 5.

SCOPA will continue to audit and approve specific hauliers at the request of all members of SCOPA and such approval can then be used jointly by all members as fulfilling the terms of this Code.

Any approved hauliers may hire, rent or lease road tankers for use under this Code but must ensure that they comply with the Code.

The list of hauliers to be audited by SCOPA will be agreed, annually, by SCOPA.

4. TANKERS

All tankers operating under this scheme must be and have been dedicated to the transport of food grade products (see Appendix 2) and must meet the criteria set out in Appendix 4. All appropriate documentation must be provided by the haulier upon request. No tankers can have previously carried or will in the future carry anything considered dangerous to human health.

New or refurbished tankers and those not previously used under the terms of this Code, must go through the following procedures - wash – minimum 1 food grade product from Category 2 of Appendix 2 – wash – inspect – if accepted by a SCOPA member, then operational.

All tanks must be indelibly endorsed with the words 'Foodstuffs Only' or European equivalent. All markings must be minimum 8cm high.

5. FLEXIBLE HOSE TRACEABILITY

All flexible hoses must be permanently identifiable and traceable.

6. TANKER CONSTRUCTION

Tankers shall be constructed in a manner that ensures the safety and quality of the product carried within it. Please refer to Appendix 4.

7. MAINTENANCE

Vehicles and tankers are to be kept clean and in a good state of repair for food use. Hauliers must be able to demonstrate a full preventative maintenance programme which takes account of food safety, quality and legal requirements. The minimum requirements are those specified by The Driver and Vehicle Standards Agency (DVSA).

8. HEALTH AND SAFETY

Local site health and safety instructions must be observed at all times. Safe working practices for road tankers are detailed in SCOPA's guidance document entitled 'Preventing Falls from Road Tankers'. In order to comply with refinery hygiene, health and safety rules, drivers must be able to understand and communicate clearly with on-site staff otherwise vehicles may be rejected.

9. DRIVER TRAINING

Approved hauliers and their employees must be experienced and knowledgeable in the transportation and handling of edible oils and fats. They must also adhere to and maintain

the necessary documentation requirements and controls to demonstrate due diligence in the care of SCOPA members' goods.

Training must include a full understanding of both this scheme as well as the SCOPA Code for Preventing Falls from Tankers and training should include any potential risks and requirements to protect food safety. This training should take place before commencement of unsupervised driving on SCOPA loads. Drivers' training records must show evidence of such training as well as competency assessments by competent trainers and must be made available to SCOPA or its auditors on request. Drivers must also be trained and be able to operate all vehicle functions and truck variants within the fleet.

Drivers must receive refresher training every 2 years which should take the form of a practical observation as opposed to a tick box checklist.

10. TRACEABILITY

Each tanker must have an auditable tracking & tracing system which must record historical information (covering minimum 3 years) of at least 3 previous cargoes for each of the compartments and cleaning history (unless SCOPA members deem cleaning to be unnecessary). This information must immediately be made available to SCOPA members and customers upon request and must be kept for a minimum of 3 years.

All product movements must be traceable within 4 hours of any given time. Periodically SCOPA will perform simulated traceability checks to test the robustness of haulier systems.

Where a tanker operating under this scheme is inactive, this must be recorded with the start and finish dates, detailing the reasons why, within the haulier's commercial system, as well as within a vehicle's maintenance records as appropriate.

11. EMERGENCY RESPONSE PROCEDURES

All hauliers must have adequate emergency response procedures in place. This should include spill procedures at delivery and collection points.

12. SECURITY SEALING/FOOD DEFENCE

To maintain the integrity of the tanker and in accordance with all applicable EU food laws, all tankers operating within this scheme must have tamper evident security seals tightly fastened on all possible openings or potential point of entry at all times other than for cleaning, loading, discharge, maintenance or inspection approved by a SCOPA member. This includes any control systems that can open points of entry. Where a central locking system is fully operational and working, a single seal is acceptable.

Flexible hoses, fittings and couplings that all come into product contact must be afforded the same level of protection as the internal of the tanker. Therefore these must also be kept in sealed carriers or containers.

Each tanker must carry a sealing plan as reference. The sealing plan should reference the tanker number or be displayed on the tanker.

Seal numbers must be recorded.

Pre-loading inspection is the responsibility of the consignor to ensure that sealing has been carried out. Securing the tanker and sealing post loading is the responsibility of the consignee. Other than the aforementioned times, security seals must not be broken or replaced without the prior knowledge or agreement of the consignor. In the event of a seal being broken outside of these parameters, the consignor must be notified as soon as practicably possible and always before presenting the cargo for discharge.

13. LIST OF COMPATIBLE PRODUCTS

Tankers operating under this Code must only carry those products defined in the food grade products list – see Appendix 2. This list is the minimum standard. Individual refiner members of SCOPA may, under certain circumstances, find it necessary to apply stricter controls.

14. CLEANING PROCEDURES

It is the responsibility of the haulier to ensure that tankers and flexible hoses are cleaned before loading, (or as directed by SCOPA members), at SCOPA member approved wash stations – see Appendix 3. This is to ensure adverse materials are precluded and to avoid any cross contamination between different food grade products. Outside the UK, hauliers must only use EFTCO approved stations.

The cleaning history forms part of the traceability log and must confirm that cleaning has been carried out correctly. After cleaning, the haulier must ensure that the tanker, all flexible hoses and any fittings are visually clean, dry and free from odour. Individual hose numbers must be recorded on the wash certificate.

The type of tanker or equipment wash must also be recorded e.g. hot water detergent wash, filtered air blow dry or sanitized wash.

***Vehicles failing to comply with relevant national or EU legislation or
This Code must not be loaded by SCOPA members.***

Appendix 1

HAULIER APPROVAL

Hauliers will be deemed as approved to carry on behalf of SCOPA Members if they have been checked by an individual SCOPA Member (using the agreed SCOPA template) or by SCOPA's independent auditor at the request of SCOPA Members. Mutual recognition, whereby SCOPA members recognise one another's conformity assessment, will be upheld.

Checks will include a desktop review of initial systems [only CMR systems that are compatible with this Code in terms of sealing information, wash information and previous loads will be authorised.] Any approved haulier must be able to demonstrate full traceability.

In case urgent approval is needed, a system check is deemed sufficient for temporary approval for a period of 3 months whereby the haulier must be subject to an independent site audit by a member company or by SCOPA's independent auditor.

Appendix 2

SCOPA LIST OF FOOD GRADE PRODUCTS

CATEGORY 1 – Products where a wash out may not be required

Where the material to be loaded is refined oil or fat for direct consumption or incorporation in food products, the three loads previously carried in the tanker must have been refined or partly processed edible oils/fats, crude vegetable or animal oils/fats or other materials intended for food use.

CATEGORY 2 – Products requiring only a wash out between loads

Everything in this category must be food grade¹

Where a blend or trade name or code is being used, the term – RD EDIBLE OIL must be declared next to it (excluding allergenic material – you cannot use this term if the blend contains allergens as per The Food Information Regulations 2014²

- (1) Refined deodorised edible oils
- (2) Crude edible vegetable oils (except those listed in Category 3)
- (3) Crude edible tallow accompanied by a Fresh Fat Clause Certificate
- (4) Hydrogenated fish oil
- (5) Butter oil
- (6) Partially processed edible oils and fats (except soft fish oils and linseed oil)
- (7) Castor oils unprocessed (except blown or dehydrated)
- (8) Foodstuffs which are for human consumption without further processing (except milk products, see below)
- (9) Glucose syrups
- (10) Malt Extract
- (11) Potable water

¹ This list is the minimum standard. Individual Refiner members of SCOPA may, under certain circumstances, find it necessary to apply stricter controls. Where different grades of product exist, a product specification confirming it is food grade category must be available.

² The 14 substances (or products thereof) causing allergies or intolerances are - cereals containing gluten (wheat, rye, barley, oats, spelt, kamut); crustaceans; eggs; fish; peanuts; soybeans; milk; nuts; celery; mustard; sesame seeds; sulphur dioxide and sulphites (at concentrations more than 10mg/kg); lupin and molluscs.

The allergens listed above must be declared in the ingredients list where provided and if it is not obvious from the name of the ingredient, there needs to be a clear reference to the name of the allergen which must appear next to the name of the ingredient i.e. gingelly oil (**sesame**). Allergenic ingredients should be emphasised in the ingredients list by using a contrasting font or type or different colour, **bold text** or CAPITALISED text for example.

Appendix 2 (Continued)

SCOPA LIST OF FOOD GRADE PRODUCTS

- (12) Food Grade emulsifiers
- (13) Propylene glycol BP and Food Grade
- (14) Glycerol/glycerine BP and Food Grade
- (15) Heat processed milk products e.g. pasteurised milk, sterilised milk, UHT milk, skimmed milk and cream³
- (16) Liquid yeast (as used in bread without further processing)
- (17) Citric Acid/Acetic Acid
- (18) Wine, Beers/Cider, other non-allergen based alcoholic beverages

CATEGORY 3 – Products which must be followed by at least one load of crude edible vegetable oil and a wash out before a load of refined edible vegetable oil

- (1) Crude fish oil
- (2) Partially processed soft fish oil
- (3) Raw and refined linseed oil
- (4) Malaysian/Indonesian Palm Fatty Acid Distillate (PFAD), acid oils and fatty acid distillate
- (5) High Erucic Acid Rapeseed
- (6) Crude peanut oil and the following crude nut oils and partially processed variants: almond, Brazil, cashew, chestnut, coconut, hazelnut, macadamia, pecan, pistachio, walnut.
- (7) Crude sesame seed oil and partially processed variants.
- (8) Nut/other allergen based alcoholic beverages.

The following products are EXCLUDED:-

Recovered edible oils (e.g. used cooking oils, separated yellow fats)
Fatty Acid Methyl Ester (FAME)
Molasses
Brown burnt glucose

³ Raw, unprocessed milk and milk based products must be followed by a wash out and sanitising rinse at an approved installation in which the sanitising system (i.e. equipment and chemical) is regularly checked for dosing accuracy and effectiveness and for which records of such checks are made available to refiners for audit and inspection.

Appendix 3

SCOPA APPROVED* WASH STATIONS

<p>ABAC Services Ltd Rowland House Regent Road Bootle, Liverpool L20 2RB Tel: 0151 473 1166</p>	<p>Abbey Logistics Ltd 2 Littlefair Road Hedon Road Hull HU9 5LP Tel: 01482 798177</p>
<p>Abbey Logistics Ltd 199 Great Howard Street Merseyside L5 9SJ Tel: 0151 207 8242</p>	<p>Fleetclean Knottingley Knottingley WF11 8BN Tel: 01977 607087</p>
<p>Isotank Hull Salveson Way Off Freightliner Road Hull, HU3 4UQ Tel: 01482 325235</p>	<p>Isotank Manchester Thompson Road Off Ashburton Road West Trafford Park Manchester M17 1SE Tel: 01482 325235</p>
<p>London Power Wash Juliette Way Purfleet Industrial Estate Purfleet, RM15 4YD Tel: 01708 890816</p>	<p>MTS (Tank Cleaning) Ltd 164 Regent Road Liverpool L20 8DD Tel: 0151 922 7832</p>
<p>South Eastern Tanker Services Ltd Breach Lane Dagenham Essex RM9 6EG Tel: 020 8593 4999</p>	<p>Tankclean Hull 1203 Hedon Road Hull HU9 5LY Tel: 01482 702185</p>

*approved by SCOPA Members

Appendix 4

SCOPA TANKER CONSTRUCTION AND MAINTENANCE PROCEDURES

	Tanker Construction Standard	Maintenance Checks
<p>Food Contact Parts - Metal Surfaces</p> <p>Food Contact Parts - Manway/valve seals and seatings</p> <p>Food Contact Parts – Lubricants</p>	<p>Stainless steel 304/ 316 fabrication only - smooth surface finish, crevice free welds. Strictly no brass, copper alloys, gun metal or ferrous metals.</p> <p>FDA approved seals; must be inert for the carriage of liquid foodstuffs. Recommend tank internal valves with pneumatic operation, or actuated via external spindle provided the actuation shaft does not intrude or be exposed within the tanker shell – i.e. the shaft sits outside the tank.</p> <p>NSF Registered lubricants authorised for incidental food contact (H1) must be used in locations in which there is a potential exposure of the lubricated part to food product</p>	<p>No excessive surface wear, corrosion or staining from foodstuff during carriage or heating. Check weld quality for pitting or corrosion.</p> <p>Foreign body risk - No seal fragmentation around manway or valve seals/seatings; routine inspection of internal tank valve seals</p> <p>Routine inspection</p>
<p>Best Practice Hygienic Design</p>	<p>Fully drainable tank, outlet pipework and pump housing (if fitted)</p> <p>Valve type crevice free i.e. use of butterfly valves. (Ball valves or hand operated screw-down footvalves are not acceptable)</p>	<p>Routine check for excessive odours – check for pockets of stagnant wash water.</p> <p>Routine valve overhaul - check for build-up of food residues</p>

	<p>Minimise gap between manway seal and recess. Minimise build-up of food product. Potential stagnant water pockets</p> <p>All working parts and tank internals that are in contact with food product in carriage MUST be contactable within the cleaning process (e.g. check 360° cleaning with no obstructions so all round cleaning of valve heads & seatings, tank walls and baffles/partitions)</p> <p>Hygienic design of pressure relief valve(s) and instrument connections (e.g. use of thermowell pockets with temperature sensors) – no exposed screw threads within the tank</p> <p>Filter unit on air compressor line (recommended 5 micron or lower). Filter element must be stainless steel. Paper or other degradable substance is NOT acceptable</p>	<p>Routine inspection</p> <p>Assured cleaning process and minimum standard as per customer requirements and use of approved cleaning station per Appendix 3.</p> <p>Routine inspection</p> <p>Routine inspection</p>
Tank jacket/Lagging Standard	Designed to minimise heat loss during carriage	Check for external tank damage – must not compromise internal weld integrity leading to leakage of food product into tank jacket. Check for persistent odour within tank

Heating Coil	Certified for operating water or steam pressure; check food grade heating medium used for in-transit heating	Check pressure tests Routine inspection of electronic coils. Annual check of thermostat calibration where fitted.
Tanker Security Sealing System	All points capable of ingress must be tamper-evident.	Check integrity Routine inspection of locking mechanism to ensure operation
Legislation Compliance	<p>Tanker meets minimum legal Road Standard.</p> <p>Tanker is within maximum Legal road weight when connected to tractor unit.</p> <p>'Foodstuffs only' or European equivalent indelibly marked on tanker tank. All markings must be minimum 8cm high.</p> <p>It is recommended that hauliers check their responsibilities under SI 2000 no. 128 (The Pressure Systems Safety Regulations 2000) regarding periodic examination of pressure vessels by a competent authority for the discharge of SCOPA products.</p>	<p>Local Authority Certification</p> <p>Local Authority Certification</p> <p>Routine inspection</p>
Trade Body Compliance	<p>'Foodstuffs only' or European equivalent indelibly marked on tanker tank. All markings must be minimum 8cm high.</p> <p>Tanker working capacity (litres) on tanker, including individual compartments.</p>	Routine Inspection

Appendix 5

AUDITING REQUIREMENTS

All SCOPA members must ensure that any haulier they use has been subject to a systems audit (see Appendix 1) and within 3 months to an independent site audit, which should thereafter take place annually.

Such systems and on-site audits can be done individually by the member company, or jointly by SCOPA, on request of all SCOPA members to the SCOPA secretariat.

A SCOPA member can use a haulier which has been approved and audited by its company elsewhere in Europe, or by another SCOPA member, provided details of such approval are available for audit by SCOPA.

In case urgent approval is needed, a system check is deemed sufficient for temporary approval for a period of 3 months whereby the haulier must be subject to an independent site audit by a member company or by SCOPA's independent auditor.

Non-compliances

Non-compliances are categorised in the following manner:-

Minor

A failure to operate consistently to the requirements of the SCOPA Code of Practice where there is no evidence that food safety has been compromised. Any **minor non-compliance** identified must be corrected. Evidence of satisfactory implementation of corrective actions must be advised to the audit body within 30 days of the audit.

Failure to implement corrective actions within the 30 days will result in escalation to a Major non-compliance.

Major

A failure to implement the requirements of the SCOPA Code of Practice where there is no evidence that food safety has been compromised. Any **major non-compliance** identified must be corrected. Evidence of satisfactory implementation of corrective actions must be advised to the audit body within 14 days of the audit.

Failure to implement corrective actions within the 14 days will result in escalation to a Critical non-compliance.

Critical

A failure to operate food safety standards and/or comply with Legal requirements such that food safety is seen to be directly compromised or that such a potential exists. If any **critical non-compliance** is identified, immediate action is required to correct it and evidence of a

corrective action plan must be advised to the audit body within 24hrs of the audit. All SCOPA members will be informed of any critical non-compliance.