



ROEHL TRANSPORT, INC.

JUNE 13, 2018





ROEHL TRANSPORT, INC.

- **Presenters:**
 - Libby Block – Director of Claims
 - Neil Wender – Upper Midwest Commercial Manager



ROEHL TRANSPORT BUSINESS UPDATE

- Roughly 2,100 Tractors
- Significant growth of refrigerated working units in 2017
 - 199 total refrigerated working units on Jan. 1, 2017
- 240 total refrigerated working units
 - 62 Dairyland
 - 170 Midwest Regional & National
- New refrigerated trailer order
- Plan to continue to grow refrigerated division



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

- The Sanitary Transportation Act by the FDA is about food safety, and each of our roles and responsibilities within the process of farm to shelf.
- FDA provided no online training as promised, even as deadline loomed.
- The real-world application of the ruling was simple on paper, and so much more complicated in practice.



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

NEW RULE AFFECTED ALL OUR DIVISIONS

- Flatbed
 - Bulk Produce
- Roehl Cold Storage Warehouses
 - Acting as a loader, a shipper, and a receiver
- Dry van
 - Bulk dry raw food product & allergens



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

FOOD SAFETY VS. FOOD QUALITY

- There is a lot of confusion on the Sanitary Transportation Act regarding food safety vs. food quality
 - A load of chocolate bars that melts is not unsafe.
 - A load of bottled water that's shifted in transit is not unsafe.
 - A load of cheese powder in semi-permeable super-sacs that bugs are found to have gotten into is unsafe.
- Established a network of adjusters that can go on scene when there is a question of contamination, tampering, etc.
 - Review and document
 - Help all parties involved figure out if something is wrong and what the next steps are.



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

TRAINING

- Strong technology platform already in place
- Developed in-house training modules into online courses
 - We broke down the rule making into digestible pieces and evolved off those pieces.
 - Identifying specific roles within the organization who are responsible for food safety or affected the transportation of regulated product
 - General Awareness of the Sanitary Transportation Act
 - Everyone involved in any freight or process with freight was required to take
 - This module included all of our drivers



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

TRAINING CONTINUED

- In all trainings, we do knowledge check tests throughout the course to check for understanding and review
- Survey at end of training
 - Over 90% of our drivers responded positively to the training and were proud that we as a company took the regulation seriously and acted rather than waiting.
 - The training flushed out misnomers and misunderstanding of what an employees' role was in food safety and the transportation of regulated product
- There is no requirement for how often employees need to be trained
 - We put a 3-year refresher mark on our program and;
 - Retraining if there was an error found to have been made by an employee



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

TRAINING CONTINUED

- After the General Awareness training was completed, we dialed into job specific functions with targeted training to those specific roles
 - Monitoring temperatures
 - Identification of a FDA regulated load
 - Tied-in seal procedures
 - Process/procedures for our Cold Storage facilities
 - Across all departments, even dialing it in right down to the maintenance departments' role



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

TRAINING CONTINUED

- We didn't have to start from square one, we could put more thoughtfulness into training development
 - Took the time to develop best practices
 - Our customers came to us for assistance in what they should be looking for in carriers to be compliant
 - We started to see in contracts that our customers were looking for our compliance to the regulation even before the compliance date was in place, and we already had an answer for them that we were rolling out a program to be compliant and not waiting for the FDA



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

REFRIGERATED TRAILERS

- Star Tracks
- Temperature monitoring
 - Based on the temperature the driver reports in from the BOL
- Door opened/closed sensors
- Trailer tracking
- Downloadable reports
- Debris, residue, odor, and contaminants
- Wash-Outs



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

REFRIGERATED CARGO SHIPPING REQUIREMENTS

- The set temperature is dictated by the bill of lading
 - Set temperature **must** be on the BOL
 - Drivers are instructed to locate set temp before signing the BOL or leaving a shipper
- Temperature is set at mid-point of a temperature range
- If pre-loaded, the temperature is checked that it is set against what the BOL states
- Driver is required to check trailer/reefer unit each time they exit the tractor



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

DRY VAN TRAILERS AND REGULATED SHIPMENTS

- Debris, residue, odor, and contaminants
- Wash-Outs
- Trailer Tracking



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

COLD STORAGE FACILITIES

- Acting as receiver/consignee of products
 - Accountable for temperature verification upon cargo arrival against the BOL
 - Accountable for seal verification upon cargo arrival
- Acting as loaders of product
 - Accountable for verification of no cross contamination of cargo



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

COLD STORAGE FACILITIES

- Acting as shippers of product
 - Accountable for verification of no cross contamination of cargo
 - Accountable for verification of trailer cleanliness
 - Accountable for shipping a safe product
- Answer to FDA, USDA, and other regulatory agencies
 - Multiple areas of compliance needs



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

STEPS TAKEN BEYOND WHAT IS REGULATED

Roehl's Food Sensitive Load Designation

- Roehl created this designation in addition to the required FDA Regulated designation
 - This designation is not legally required, but meant to further protect consumers
 - Shipments can carry either or both designations
- Roehl requires all Dry Van and Refrigerated loads to be sealed
 - Regardless of commodity
 - Driver's carry Roehl seals in case shipper does not have a seal



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

SEAL INTEGRITY

- Seal process and procedures, one would think is the easiest part of the process, in training anyone who is involved with the process of hauling FDA regulated freight.
 - What happened was the opposite – it shook out a lot of misnomers and gave us visibility to where we could develop our overall process better throughout the fleet.
- We reduced overall cargo claims by almost half from 2016 to 2017 because of more scrutiny to seal processes.



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

SEAL INTEGRITY CONTINUED

- Roehl Best Practice:
 - Proper way to seal a trailer at a shipper:
 - *Shipper pre-seals a pre-loaded trailer prior to driver arrival*
 - *Shipper seals trailer in drivers' presence*
 - *Shipper gives driver a seal to seal trailer with*
 - *Shipper provides no seal, in which case we require driver to use a Roehl seal.*
 - *Guard seals trailer prior to driver exiting the gate*
 - *Driver reports in the seal # on trailer at time of pick-up*



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

SEAL INTEGRITY CONTINUED

- Law enforcement may break seal for inspection
 - They will provide replacement seal and note on BOL
 - Driver reports this back to Roehl immediately to inform customer if load is a FDA regulated or Food Sensitive load



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

SEAL INTEGRITY CONTINUED

- Roehl Best Practice
 - Seal all loads and seal number is on the BOL before a driver leaves shipper
- Proper way to check in at a consignee
 - Driver checks in and informs of a sealed load
 - Driver asks consignee to break the seal or observe the driver breaking the seal



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

SEAL INTEGRITY CONTINUED

- Consignee is to write “seal intact” on the BOL
 - If consignee refuses to write “seal intact” and it is an FDA regulated or Food Sensitive load, best practice is for the driver to ask for the person’s name and reason for refusing and to call Roehl for further instruction
 - If consignee refuses to write “seal intact” and it is not an FDA regulated or Food Sensitive load, driver is to ask persons name, reason why, make notes on the BOL, and sign “seal intact” with their own name



THE SANITARY TRANSPORTATION RULE IN REAL LIFE

OTHER SANITARY TRANSPORTATION RULE ITEMS

- Carrier record-keeping requirements
 - Proof of training of employees
 - Temperature monitoring records
 - Wash out records
 - Previous cargo hauled
- Equipment Maintenance
- Criminal implications



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