

HACCP- Haulage Food or Feed Safety Plan

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Scope of study

The aim of this HACCP plan is to identify potential hazards, put actions in place to reduce the risk of contamination to the lowest practicable level, and to demonstrate compliance to the necessary and relevant legislation and TASC Scheme.

This HACCP plan covers from Purchasing new/second hand trailers to the despatch of food/ feed goods. Scope: The haulage of bulk moist co-products, combinable crops, dry feed materials/ingredients, compound animal feeding stuffs and as-grown cereal/herbage seed. The HACCP team has agreed to consider all the following hazards:

- Pathogenic microorganisms in soil, water and human (E.coli, Salmonella, Mycotoxins, etc)
- Chemical (pesticides residues, lubricants, cleaning chemicals, fertilisers, etc.)
- Physical hazards (foreign bodies such as broken glass, metal fragments, plastics, wood, insects, stones, etc.)
- Allergenic hazards (in relation to customer terms and conditions. Examples would be cereals (gluten), nuts, milk, lupins etc.)

Quality issues have not been considered as part of the HACCP plan.

P.A. Wright & Sons Ltd.- Wrights of Twycross Ltd. won't haul bulk animal- derived dicalcium phosphate and hydrolysed protein.

Definitions:

HACCP	Hazard Analysis Critical Control Point
CCP	Critical Control Point
PRP	Pre-requisite Programme

Reference was made to the following documents/sources of information:

- AIC - TASC Standard for Road Haulage – latest revision.
- Red Tractor Combinable and Sugar Beet Standard- latest revision.
- Codex Alimentarius CXC 1-1969 General Principles of Food Hygiene – 2022 revision.
- Codex Alimentarius Code of Hygienic Practice for Fresh Fruits and Vegetables CXC 53-2003.
- TASC Haulier- HACCP Procedure Flow Diagram v.5
- Food Safety Act 1990 as amended.
- Regulation (EC) No. 852/2004 Hygiene of Foodstuffs – 2004 as amended.
- Regulation (EC) No. 183/2005 Feed Hygiene - 2005 as amended.
- The Food and Environment Protection Act 1985.
- The Food Safety (General Food Hygiene) Regulations 1995 as amended.
- Regulation (EC) No. 2073/2005 Microbiological Criteria for Foodstuffs – 2005 as amended.
- Regulation (EC) No. 178/2002 General Principles and Requirements of Food Law – 2002 as amended.
- The Pesticides (Maximum Residue Levels in Crops, Food and Feeding Stuff) (England and Wales) Regulations 2008.

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- Commission Regulation (EC) No. 2023/915 of 25 April 2023 on maximum levels for certain contaminants in food.
- Relevant customer policies/guidelines.
- ADHB Grain Storage Guide.
- Defra Code of Practice for the Control of Salmonella in Animal Feed latest version.

Management Commitment

A documented Haulage Food/Feed Policy Statement is in place (G2.1) and is reviewed and signed at a minimum frequency of annually by the Director.

Any trends are assessed during the annual Management review meeting which covers food/feed safety, the HACCP review and any issues which may have arisen as part of the agenda.

Team

The HACCP team is made up of a multidisciplinary team, based on their knowledge and their specific areas of the business. All members are trained in basic HACCP. The team is responsible for developing, implementing, maintaining, and reviewing the food safety management system for the haulage activities.

Name	Job Title	Team	Training	Experience
Louise Whitehead	Farm Secretary	Team Member	Intermate in HACCP Principles- 14/02/2007	15 + yrs. HACCP and audit documentation management. Director. BSC Agricultural Food Marketing & Business studies.
Maria I. Fort Rausell	Farm Technical Manager	Team Leader	HACCP Level 3- 02/10/17 Food Defence - 06/02/23	10 + yrs. food industry experience within Technical Team. BRC audit experience. Degree: Agricultural Engineer speciality Food Industry.
James Wright	Ops Manager	Team Member	Internal HACCP basic training	25 + yrs. business experience and product knowledge. Director.
Edward Whitehead	Crop Production Manager	Team Member	Internal HACCP basic training	15 + yrs. grower experience, customer, harvest, sprayer and product knowledge.
Josh Wright	Contract Manager	Team Member	Internal HACCP basic training	15 + yrs. Haulage contract manager.

Process Flow

Our process flow is in place and validated by the HACCP team. This is reviewed at least annually by the HACCP team or when there is a change to the process.

Purchasing New/ Second hand Trailers


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Before purchasing second-hand/new vehicles for carrying any goods covered by TASC, Contracts Manager / Transport Manager will provide to the Certification Body a declaration from the previous operator which must include:

- a signed declaration that no materials on the current forbidden/exclusion list/GMO have been carried
- details of the last three loads carried and related cleaning and sanitising records
- VIN/Chassis number
- date of acquisition

New vehicles will be identified with unique number i.e. **T1**, the TASC Logo  and our scheme number **YY2608** on both sides and rear of the trailer,

Acceptance and Allocation of Haulage

Contracts Manager / Transport Manager raises a “TASC Work Instruction” via Big Change to a trained driver with details of which trailer to use. Then the driver can look on the trailer record on <https://www.wrightsoftwycross.co.uk/tascc-tailer-inspections/> as to what its previous load was and what cleaning procedure it requires.

Collection Preparation

The collection details are drawn up and emailed to the assigned driver along with the allocated trailer’s record sheet. The driver prepares his collection paperwork. He also carries out his pre-operation checks on r2c app which include a trailer inspection, ensuring all lights are intact and no oil leaks etc. He then carries out the appropriate cleaning operations to remove previous load residue as recorded on the trailer record sheet. The driver then records his actions on the trailer record sheet.

Loading

When arriving at the collection point the driver speaks with the named contact, confirming the collection paperwork details i.e.; address, product description, variety and loading site.

The vehicle and trailer are inspected prior to loading by both the driver and collection sites person responsible for loading and complete the declaration.

The driver supervises the loading ensuring safe loading to maintain the integrity of the goods and correct weight distribution. The vehicle weight is then checked (by the on-board weigher /weighbridge) so that it does not exceed the maximum gross weight. The trailer is sheeted immediately after loading. The sheet and body are inspected for water leaks.

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Departure Preparation

The driver signs and leaves a copy of the collection note, and collects, if applicable a combinable crop passport, checking the assurance sticker is attached where necessary and that sections 2 and 3 are completed and signed.

Transportation

Journey to destination (if the lorry and trailer stop en-route the driver ensures that all reasonable precautions are taken to not put the load at risk – the driver checks the integrity of the load before continuing – looking for signs of contamination deliberate or accidental).

Despatch Preparation

Upon arriving at the delivery address, the driver seeks confirmation with site. Delivery note and Combinable Crop Passport if applicable are handed over. – if a farm site and no one present then driver to sign (with time and date).

The driver only un-sheets the load to allow a sample to be taken.

Unloading

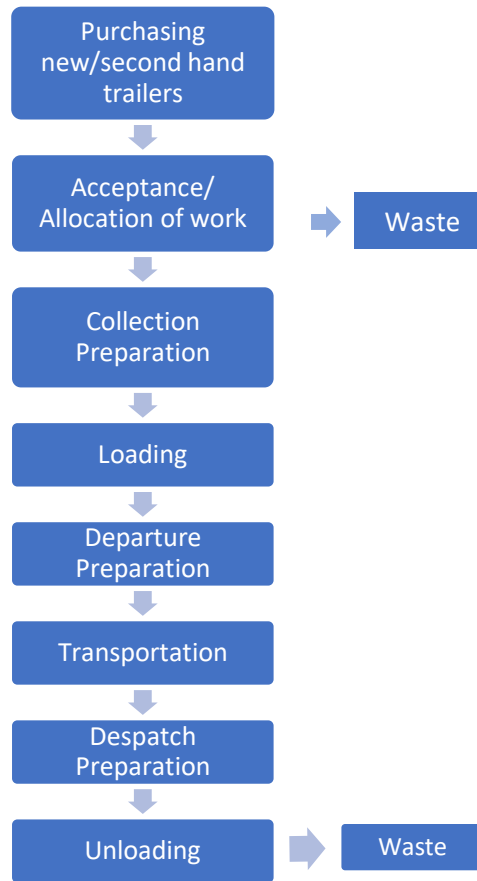
Once the tipping/unloading area is confirmed, the driver checks the location and weather before commencing unloading and does not leave the load un-attended whilst unloading. Any spillage amounts would be recorded on the paperwork by the driver with approx. quantity. The driver inspects that the trailer is empty and sweeps/washes out where necessary.

Any incidents during loading, transportation or unloading that could result in the contamination / loss of the goods the circumstances must be reported to the transport manager who then informs the customer – they will advise of the necessary action.

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Hazard Analysis

Using the process flow, a hazard analysis has been created, listing all of the potential risks at each process step.

Potential hazards are categorised in four categories: physical, biological, chemical and allergens. GM is considered within chemical risks.

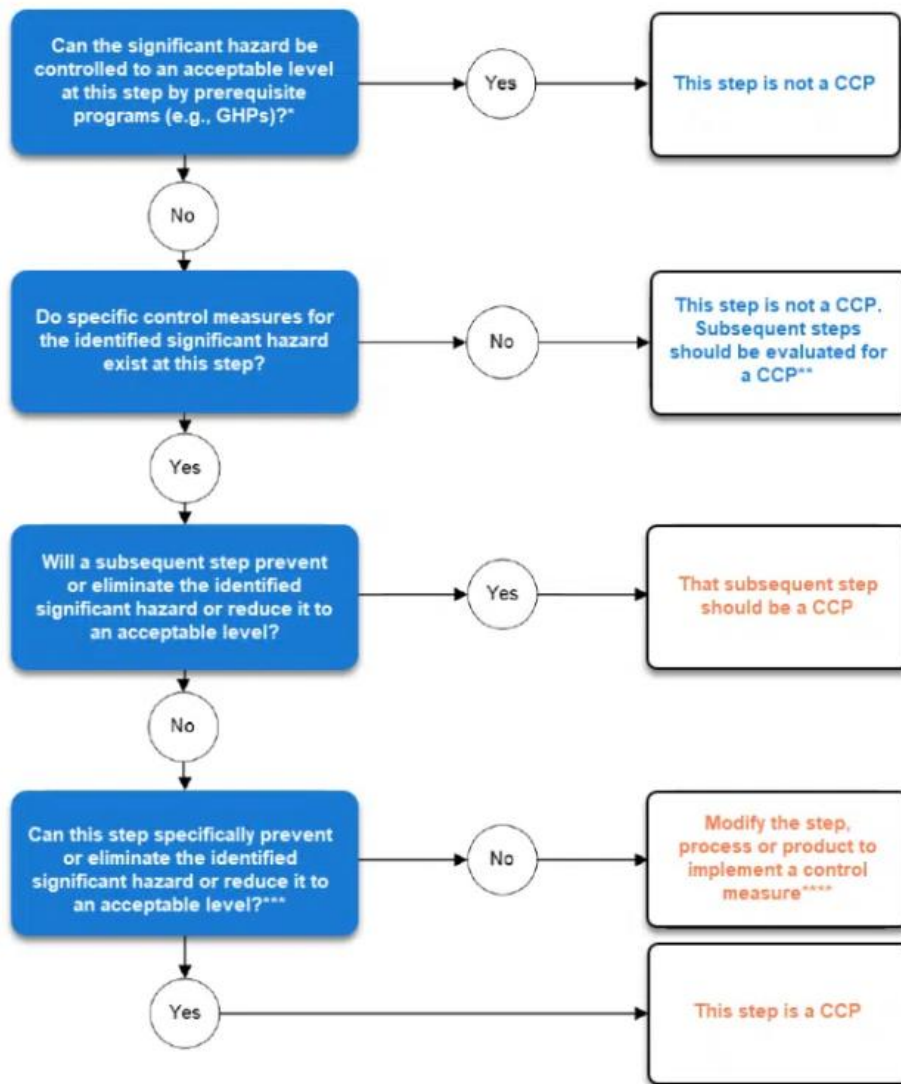
Potential hazards are scored based on their likelihood and severity, and control measures are defined. This analysis aids the identification of significant hazards, where elimination or reduction to acceptable levels is crucial to the for safe and legal food/ feed. The use of the CCP decision tree is implemented for this stage. However, the HACCP team's judgement, expertise and knowledge of the process are the major factors in establishing CCPs.

P.A. Wright & Sons Ltd.- Wrights of Twycross Ltd. recognises Salmonella as a significant biological hazard for feed safety in line with The Defra Code of Practice for the Control of Salmonella which could occur during our haulage activities if hygiene is not controlled. Our control of Salmonella relies on the cleaning of our TASC trailers between loads following the cleaning methods required by the IDTF, the regular training of staff in Hygiene and the cleaning records. Cleaning and hygiene procedures are checked regularly with Internal Audits including cleaning records. The HACCP team review new hazards including Salmonella on the Management Review meeting. We would considerately test for Salmonella as an additional verification if there was a reasonable suspicion of contamination ie. following an incident.

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Codex Alimentarius CCP Decision Tree



System Review

A full annual review is conducted once per year to check its accuracy. Each time the review procedure is carried out validation checks will be carried out.

A review is mandatory for a change of materials carried, a change in process (ie. Haulage, storage subcontracted, etc) or to the pre-requisite procedures, to UK/EU Food/Feed Safety legislation, to customer requirements, information about new hazards or incidents that could affect food/ feed safety ie. microbiological test results or customer complaints.

Reporting

In the event of any actual or suspected food/ feed safety incident, to follow Recall Procedure.

Legal & Scientific monitoring

The HACCP team leader is responsible for ensuring that the company keeps up to date with legal and scientific monitoring within the industry via respected sources including the following:

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- Food Standards Agency update emails
- Government weekly updates from Department for Environment, Food and Rural Affairs
- RASFF database
- AIC website news
- AIC Assurance Scheme Alert emails
- Horizon scanning- <https://trello.com/b/aoFO1UEf/food-fraud-risk-information>

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HACCP Control Plan

Key code of likelihood and severity L= Low, M= Medium, H= High; Key code of Risk 1-LL, 2LM, 3-MM, 4-LH, 5-MH, 6-HH

Key code of Hazards P=Physical; C=Chemical; B=Microbiological; A=Allergenic

Process step	Hazards and Causes	Likelihood	Severity	Risk	Control Measures	Decision Tree	Critical Limit	Monitoring Procedures	Corrective Actions	Record
Purchasing New/ Second hand Trailers	P/C/MB: Goods become contaminated because of residues from Manufacturing the trailer. TASC trailer has previously carried Forbidden/ Exclusion list materials/GMO.	L	M	2	Trailer washed & sanitised before use. Written declaration from previous user.	Q1- Yes- Not a CCP	No Forbidden/ Exclusion list/GMO materials carried.	Internal audits, spot checks.	Re-train.	Cleaning records. Written declaration from purchase.
Acceptance/ Allocation of work	P/C/MB: TASC trailer has previously carried Forbidden/ Exclusion list materials/GMO. Driver not received TASC training. A: previous load contains allergens, not compatible with goods to be delivered.	L	H	4	Manager checks the material on IDTF before the allocation to a TASC trailer, assigns relevant cleaning and TASC driver. TASC training for drivers every year. Manager aware of specific customer requirements.	Q1- Yes- Not a CCP	No Forbidden/ Exclusion list /GMO materials. Only TASC trained staff used.	Internal audits, spot checks ie. cleaning records. Customer complaints.	To follow procedures, training matrix & IDTF.	TASC Work Instruction" via Big Change with previous use. Training records.
Collection Preparation	P/C/MB/A: incorrect trailer hooked. P/C/MB/A: Incorrect cleaning method, poor cleaning, non food grade chemical. P: risk of foreign bodies due to damaged equipment.	M	M	3	Trailers with clear ID number. Trained & experienced drivers. Driver visual checks. Clear information on TASC work instruction Big Change. Cleaning programme followed. Food grade chemical spec. Pre-operation checks on r2c.	Q1- Yes- Not a CCP	Only TASC trained staff used. No missing pieces. No uncleaned trailers.	Internal audits, spot checks. Customer complaints.	To stop and report.	TASC Work Instruction" r2c. Training records. Cleaning records.

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Loading	P/C/MB/A: incorrect load/site. Poor cleaning. P: Introduction of foreign bodies due to loading area or unsheeted trailer. MB: Introduction of bacteria.	L	M	2	Trained & experienced drivers. Clear information. Driver & site operative check of collection paperwork & trailer hygiene. Driver check loading area & goods. Trailer sheeted after loading.	Q1- Yes- Not a CCP	Not to load if dirty, wet or not matching information of paperwork.	Internal audits. Customer complaints.	To stop and report. Re-clean.	Collection paperwork with previous load details. Training records.
Departure Preparation	C: Introduction of mycotoxin if wheat. P/C: Non assured crops delivered as assured	L	M	2	Collection site provides Crop Passport with Assurance sticker, section 2 & 3 completed and mycotoxin risk assessment if wheat.	Q1- Yes- Not a CCP	Incomplete Crop Passport.	Customer complaints.	To stop and report.	Crop Passport
Transportation	P/C/MB/A: contamination due to malicious contamination or accidental. P: contamination due to unsheeted trailer.	L	H	4	Trained & experienced drivers. Driver needs to check integrity of goods if stopping on journey. Only unsheet trailer when loading, unloading, sample.	Q1- Yes- Not a CCP	Signs of contamination or damaged of trailer.	Customer complaints.	To stop and report.	Training records.
Despatch Preparation	P/C/MB/A: incorrect site/point of delivery.	L	M	2	Trained & experienced drivers. Clear information. Driver & site operative check of delivery paperwork & trailer hygiene.	Q1- Yes- Not a CCP	Incorrect information.	Customer complaints.	To stop and report.	Delivery paperwork with previous load details. Training records.
Unloading	P: Introduction of foreign bodies due to unloading area.	L	M	2	Trained & experienced drivers. Driver check loading area & goods before unloading.	Q1- Yes- Not a CCP	Not to unload if dirty or wet.	Customer complaints.	To stop and report.	Training records.

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Prerequisite Programmes (PRPs)

P=Physical; C=Chemical; B=Microbiological; A=Allergenic. FTM= Farm Technical Manager; TM= Transport Manager; D = TASC driver trained; CO= Compliance Officer.

PRPs	P	C	B	A	Prevent (Responsibility)	Check (Validation)	Corrective Actions	Doc Ref
Cleaning	x	x	x	x	<ul style="list-style-type: none"> Approved chemical, food grade sanitiser- FTM Cleaning programme including 6 weekly sanitations and external of vehicle-TM Identification of cleaning method and procedure following IDTF - TM SDS and method of use held for approved cleaning chemical - FTM Staff trained on cleaning procedures- FTM Cleaning completed and recorded- D New/second hand TASC trailers cleaned before use – TM Trailers inspected before loading/ unloading- D Cleaning after inactive periods-TM 	<ul style="list-style-type: none"> Internal audits including audit checklist Customer complaints Records of cleaning 	<ul style="list-style-type: none"> Re-training given where necessary Increase frequency of internal audits Investigation of complaints Update procedures Recall procedure 	<ul style="list-style-type: none"> IDTF Cleaning records with 3 previous loads Cleaning records 6 weekly Driver’s Guide to AIC TASC Road Haulage Standard & HACCP G20.1 Complaints log SA.2 Supplier database (chemical) Inactive period records
Maintenance programme	x	x			<ul style="list-style-type: none"> 6 weekly checks for mechanical defects in the workshops & annual MOT – CO Pre-operational checks on r2c – D 	<ul style="list-style-type: none"> Internal audits including audit checklist Customer complaints Records of checks 	<ul style="list-style-type: none"> Re-training given where necessary Increase frequency of internal audits Investigation of complaints Update procedures Recall procedure 	<ul style="list-style-type: none"> G20.1 Complaints log r2c Workshop 6 weekly check records
Personnel & Training	x	x	x	x	<ul style="list-style-type: none"> Pre-employment health questionnaire- TM Driver’s Guide to AIC TASC Road Haulage Standard & HACCP and annual refresher – FTM Known TASC trailers - All Allergen awareness -FTM Job specific training carried out before individual working allowed -TM TASC I learner: driver, transport manager, storage (competence evaluation)-FTM TASC CPC training- TM 	<ul style="list-style-type: none"> Internal audits including audit checklist Competency reviews ie I learner test Customer complaints 	<ul style="list-style-type: none"> Re-training given where necessary Increase frequency of internal audits Investigation of complaints Update procedures 	<ul style="list-style-type: none"> IDTF Driver’s Guide to AIC TASC Road Haulage Standard & HACCP G20.1 Complaints log pre-employment health questionnaire G2.1 Haulage Food/ Feed Safety Policy Statement Training Record/ certificates

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								<ul style="list-style-type: none"> • G6 TASC Training Matrix • Management review
Customer requirement	x	x	x	x	<ul style="list-style-type: none"> • Customer list: British sugar, Openfield, ADM, Frontier- TM • Approved goods: Not moving anything from the sensitive or exclusion list/GMO/ materials derived dicalcium phosphate and hydrolysed protein - TM 	<ul style="list-style-type: none"> • Internal audits including audit checklist • Customer complaints • Traceability exercises 	<ul style="list-style-type: none"> • Re-training given where necessary • Increase frequency of internal audits • Investigation of complaints • Update procedures 	<ul style="list-style-type: none"> • Sensitive list • Exclusion list
Supplier approval (haulage subcontract, trailers new/second hand)	x	x	x	x	<ul style="list-style-type: none"> • Haulage subcontract (TASC certified): ABH and customer requirements communicated- TM • TASC certificate checker of the haulage subcontract- TM • TASC trailers clearly identified, unique number ID and TASC Scheme ID YY2068 on both sides and the rear - TM • Trailers fit for the purpose, sheeted and grain sock- TM • New/second hand TASC trailers with suitable history & records -TM 	<ul style="list-style-type: none"> • Internal audits including audit checklist • Customer complaints • Traceability exercises 	<ul style="list-style-type: none"> • Re-training given where necessary • Increase frequency of internal audits • Investigation of complaints • Update procedures 	<ul style="list-style-type: none"> • H6 TASC certificate checker • Assurance scheme alert emails • Cleaning records, declaration of no carried any forbidden goods, etc if second hand • Written declaration from purchase • TASC approved vehicles on certification body portal including the approval for addition
Traceability & Records	x	x	x	x	<ul style="list-style-type: none"> • All goods carried are identified and traceable through records- TM 	<ul style="list-style-type: none"> • Internal audits including audit checklist • Customer complaints and trends • Traceability exercises/ mock recall exercise • Spot checks 	<ul style="list-style-type: none"> • Re-training given where necessary • Increase frequency of internal audits • Investigation of complaints • Update procedures 	<ul style="list-style-type: none"> • r2c • Workshop 6 weekly check records • Cleaning records for the 3 previous loads • Collection note • Delivery note • Inactive period records • Cleaning records 6 weekly

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Allergen Risk Assessment

The FSA (Food Standards Agency) recognises 14 allergens: celery, cereals containing gluten (such as wheat, barley and oat), crustaceans (such as prawns, crabs and lobsters, egg, fish, lupin, milk, molluscs (such as mussels and oysters), mustard, peanuts, sesame, soybeans, sulphur dioxide and sulphites (if the sulphur dioxide and sulphites are at a concentration of more than ten parts per million) and tree nuts (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios and macadamia nuts).

We have conducted a formal risk assessment detailing all allergen risks ensuring no cross contamination can take place. Details of controls below.

Hazardous Event	1	2	3	4	5
Likelihood	Very unlikely	Unlikely	Likely (It could occur)	Very Likely	Certain
Severity	Slight health impairment	Less than 3 days off work	More than 3 days off work	Health impairment, little chance of full recovery	Potential fatal

	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

Risk Rating
Low – monitor the situation
Medium – identify improvements, draw up action plan and monitor
High – urgent action required to reduce exposure and re-assess

Allergen Hazards Initial Risk Assessment	Likelihood	Severity	Risk
Presence of one of the 14 Allergens in the products we sell	2	5	10 - Med

Potential Sources	Practices	Cereals-gluten	Crustaceans	Eggs	Fish	Peanuts	Soyabean	Milk	Nuts	Celery	Lupin	Molluscs	Mustard	Sesame Seed	Sulphur Dioxide	Likelihood	Severity	Risk Rating (LXS)	Current control measures
Handling	Drivers do not handle																		No specific risk from this source.
Transport (trailers)	No mixed loads	x														1	5	5 - Low	No mixed loads. Cleaning programme following IDTF depending on load, cleaning between crops. Allergenic crops transported as whole. Routine checks of cleaning records by management. Details of last load. Cleaning records. Driver and site operative check trailer hygiene before loading /unloading.

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People	Consumption of allergens and food containing allergens	x	x	x	x	x	x	x	x	x	x	x	x	x	x	1	5	5 - Low	Food safety procedure in place and trained. Eating away from goods. Allergen awareness training. Internal audits and spot checks. Annual refreshers.
Cleaning	No allergens																		No specific risk from this source

Allergen Hazards Revised Risk Assessment	Likelihood	Severity	Risk
Presence of one of the 14 Allergens in the products we sell	1	5	5 - Low

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