Bulk Storage and Handling

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Gafta Promoting international trade

Code of Practice for Bulk Storage and Handling

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Code of Practice for the Storage and Handling of Combinable Crops and Animal Feed Materials in Bulk.

GTAS Bulk Storage and Handling Manual.
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A.	**Introduction** Goods that are traded within the international grain and feed trade are often handled and stored a number of times. The manner in which this takes place is vital to maintain the original quality and condition of the goods and the prevention of contamination that might render the goods unfit for their intended use.
B.	**Scope and Store Eligibility** This Code of Practice comprises a set of minimum standards which storekeepers must achieve when storing and handling goods, including imports and exports, which are, or may be, intended for human consumption after processing or which are intended to enter the food chain either for direct feeding to livestock or for incorporation into animal feedingstuffs. This Code of Practice is intended for premises that are dedicated to the storage of animal feed materials, combinable crops, finished products and processed materials for food and/or feed purposes.
B.1	Stores that are not dedicated to the storage of combinable crops or animal feed materials shall be eligible for approval under the following conditions:
B.1.1	Stores that have stored material on the Contaminant Sensitive List must be thoroughly cleaned/disinfected.
B.1.2 K	No building previously used for housing of livestock of any kind or stores that have stored materials on the Exclusion List shall be used for the storage of goods unless the whole of the inside of the building including floors, walls, roofs, roof trusses and fittings, have first been thoroughly cleaned to remove all organic material followed by a thorough pressure cleaning with a hot (70-80C) solution of any combined food grade detergent/disinfectant, diluted in accordance with manufacturer's recommendations dried and then approved by the Scheme Verifier before use. [R]
B.1.3 K	No building previously used for other purposes that might possibly lead to contamination, taint, infestation or transmission of disease must be used for the storage of goods until adequate and appropriate cleaning and disinfecting has been carried out in accordance with Appendix 2. [R]
B.2	Biomass Goods suitable for food and/or feed purposes that are intended for biomass use may be stored in the same way as goods intended for use for food and/or feed. Other materials intended for biomass use that are not suitable for use as food and/or feed may be stored in premises certified under this Code of Practice after completion of a HACCP Risk Assessment form (available from Gafta) to be submitted to Gafta for approval. Risk Assessment forms must be specific regarding the source and description of the biomass commodity (for which permission to store is being sought) since there may be variation between goods of the same general description from different origins. Approval where given is specific to each biomass commodity and for each source or origin of the material for which the application is made. The completed HACCP risk assessment form and written approval from Gafta must be retained and made available during any audit. There is no limit to the number of applications that can be made or approvals given. [R]
C. C.1	**Records** An important part of this Code of Practice is the need for verification that essential activities have taken place at the appropriate time and by an appropriate person. Therefore it is essential that records (computerised or in hard copy) are kept and are available at all times for audit inspection. An [R] in the text indicates where there is a need to keep a record. This is not an exhaustive indicator and there may be a requirement for other records to be kept.
C.2	Internally produced records must be signed by the person carrying out the task/activity.
C.3	Records must be legible and kept in suitable conditions that allow ready retrieval and prevent deterioration.
C.4	Records must be kept for a minimum of three years, unless there are additional requirements.
D.	**Definitions** "Definitions" relating to this Manual are set out in the Scheme Overview or are available separately in Part 3 of the scheme documentation.

1.0 1.1	**Loading and Discharge Handling Operations** Such operations can take place at port installations, primary processing plants, storage facilities, and elevators (including floating elevators, tank terminals and ship to ship transfers). The operators of these facilities will be responsible for the movement of the agricultural commodities in terms of maintaining their quality and integrity during either the loading or discharge operation. In addition, the responsibility of ascertaining the weight of agricultural commodities will be within their remit. (See GAFTA Weighing Rules No.123). The key controls necessary for load/discharge operators are: -
1.2	All goods must be loaded or discharged via a secure route and method.
1.3	Where weight is to be determined, the goods must pass through the weighing equipment in a secure route.
1.4	All sweepings and or spillage must be uplifted and accounted for either by weighing or by mutual agreement between the contracting parties or their representatives. Where sweepings and or spillage has come into contact with extraneous matter such as spilt oil, bird droppings or dirt of any kind they must not be re-introduced into the original goods but must be disposed of in a safe manner in agreement with the owner of the goods. [R]
1.5	If instructed to do so by the owner of the agricultural commodities, special attention should be given to the handling of organic and genetically modified materials.
1.6	Handling and storage should be performed by operators with clear management systems and rules as laid down in the Gafta Trade Assurance Scheme, and take into consideration the legal requirements of the competent authorities.
1.7	All handling equipment must be kept clean and free from leakage at all times.
1.8	Premises and equipment must be accessible for the control of on-going operations.
1.9	Adequate loading and unloading equipment should be available for the different types of transportation means (trucks, railcars, barges etc.)
1.10	In case of bad weather conditions adequate measures must be taken in order to prevent damage to the goods.
1.11 K	When different operations are simultaneously carried out, the circuits in use must be carefully secured to prevent co-mingling.
1.12	Each operation must be recorded.
2.0 K	**Statutory Requirements** The storekeeper must at all times exercise due diligence in the care of the goods, and must be conversant with and comply with the legislative requirements of the country in which they are operating. This includes (inter alia) any local and national health and safety legislation. Storekeepers must comply with a recognised Code of Practice for the Control of Salmonella. In the absence of such Code of Practice, the Gafta Monitoring Code for the Control of Salmonella shall apply. Storekeepers must demonstrate the actions taken to store goods in accordance with applicable legislation and customer requirements.
3.0	**Food and Feed Premises Registration Regulations** Storekeepers operating within the European Union should note that before storing any goods which may be destined for human and/or animal consumption, that they must apply to their local authority to register their premises. Storekeepers located outside the European Union are advised to check with their local authorities whether such requirement exists. [R]
4.0	**Registration of Storekeepers under EU TSE Regulations**

	Storekeepers operating within the European Union should note that registration with the official authorities is required for dedicated bulk, animal-derived dicalcium phosphate and hydrolysed protein storage. Storekeepers located outside the European Union are advised to check with their local authorities whether such requirement exists. [R]
5.0 K	**Hazard Analysis and Critical Control Points (HACCP)** A formal risk assessment must be carried out, implemented and maintained with the aim of identifying and controlling any hazards that might adversely affect the integrity of stored materials. [R] This is a statutory requirement for any feed business operator in the EU. Risk assessments must be carried out in accordance with recognised HACCP principles (see Scheme manual and Part 3 HACCP Guidance).
6.0 6.1 K	**The Store** The storage facility must be secure, soundly constructed of durable materials, fully enclosed, and proofed against birds and rodents, sufficient to protect the goods from damage and contamination. The area immediately surrounding the store site must be designed and maintained to limit contamination of stored goods.
6.2 K	Roofs must be sound and leak proof.
6.3 K	Floors and walls of the store must be impervious to liquids. All openings such as manholes, inlets, outlets, drainage points, etc., must be sealed effectively. The layout of the store and of any necessary plant therein should be such as to avoid the creation of uncleanable recesses. No unnecessary plant should be kept in the store.
6.4	Floors or walls that are sealed or coated in bitumen or where a bituminous filler is used, must not come into contact with stored materials.
6.5 K	Stores must be maintained in a clean, dry state, free from taint and abnormal odour.
6.6	There must be adequate and effective drainage.
6.7 K	There must be sufficient clean hard standing at the store entrances to prevent tracking of water and mud into the store.
6.8	Each separate store should be clearly identified by name, initial, or number. Where the store is subdivided into bays, each bay must also be separately and clearly identified. A plan of the store, including identification of bays, bins, silos or tanks, must be kept up to date so that goods can be easily identified. [R]
6.9 K	The ventilation facilities must be adequate to prevent the build-up of hot air or condensation. External ventilation and aeration openings must be proofed against the entry of birds and vermin.
6.10 K	Switches, wiring, lighting, etc., must be sited well clear of all stored materials. All light bulbs and fluorescent tubes must be covered with non-glass fittings or approved protective coating, and any windows and/or glass roof lights must be guarded to prevent the possibility of glass contaminating the stored goods.
6.11	Where heating facilities are required for certain liquids, the means of heating must be appropriate for the goods being stored. Heating equipment must not leak, be kept in good repair, be monitored and controlled. [R]
6.12	For liquid storage thermometers, sampling equipment and tank content gauges must be appropriate and the equipment be maintained. [R]
6.13	Liquid filters and strainers must be inspected at regular intervals and cleaned in accordance with a formal cleaning programme [R].
6.14	Weighbridge(s) and any other weighing equipment must be calibrated annually. [R]
6.15	Testing equipment used for stores monitoring purposes must be calibrated to manufacturer's instructions at least annually [R].

6.16	Store entrances, exits and gangways must allow access to stored goods in case of heating or fire.
7.0	**Cleaning the Store**
7.1 K	Stores must employ a routine cleaning programme covering all parts of the store and structures within it, in particular roof trusses, ledges, all dust collecting surfaces and all handling and weighing equipment [R] Outside of the routine cleaning programme, stores must ensure that floors are kept clean and dry at all times. The entire store, including all structures, must be subjected to a regular thorough cleaning programme when empty preferably on an annual basis. The storage and disposal of waste material produced during cleaning operations must be considered as part of the store HACCP plan.
7.2 K REV	Stores must be thoroughly cleaned before a changeover between different groups of commodities stored for example between: • Combinable crops • Marine derived goods • Minerals • Moist feeds • Vegetable commodities Any store that has held goods contaminated with salmonella must be decontaminated before further use. Any equipment used to handle goods which could be a source of contamination, or goods known to be contaminated, must be thoroughly cleaned, sanitised and if necessary dried before being used to handle other goods.
7.3 K	Liquid storage tanks must be inspected and cleaned on a prescribed basis, depending on the nature of the liquid being stored and whether a tank is dedicated to storage of a particular type of material. The frequency of complete emptying and cleaning will depend on the physical and microbiological storage stability of the material. [R] On cleaning, the tank must be fully drained of wash medium prior to refilling and the wash water must be disposed of in an environmentally acceptable manner. The tank must be emptied and cleaned before a switchover between vegetable and marine commodities. Where appropriate, cleaning must be conducted in accordance with the applicable Code of Practice for the Control of Salmonella.
7.4 REV	Any equipment used to load, unload or otherwise handle or sample goods must be suitable for the purpose and must be routinely maintained in a clean condition appropriate for the handling of crops. Any equipment used to handle goods which could be a source of contamination, must be thoroughly cleaned, dried and disinfected before being used to handle other goods.
7.5 K	Equipment used for the handling of goods must not be used for the handling of the materials contained in the Exclusion List (see Appendix 1). [R]
7.6 REV	In areas where goods are stored particular attention must be paid to checking for leaks from handling equipment and vehicles.
7.7 REV	Vehicles and equipment, which are not required in the handling of the goods or cleaning of the store, must be excluded from the store and stored/parked in designated area(s).
7.8	Where common plant and equipment (pipelines, pumps etc.) are used for handling different liquid goods, an efficient line cleaning system must be used.
7.9	Exposed ends of flexible hoses should be kept capped when not in use.
7.10	Non-phenolic food grade disinfectants and approved pesticides and fumigants are the only products which may be used and must be applied by equipment capable of achieving the correct application. [R]

8.0 K REV	**Contracting Out** Only storage companies that are certified under GTAS or a scheme recognised by GTAS can store goods under this Code of Practice. If a storage company is unable to fulfil an obligation to store goods for legitimate reasons they can, after prior reference to and approval from the owner of the goods, contract out the obligation to another storage company that is certified under GTAS or a scheme recognised by GTAS. This is often referred to as sub-contracting.
9.0 REV	**Insurance** Storekeepers must demonstrate that they have adequate and appropriate insurance cover to cover any claims that may arise as a result of liability in respect of goods stored. Levels of cover will differ significantly depending on the type of goods stored and the scale of risks involved. Insurance may be covered through commercial or private (self assurance) channels and must cover public and product liabilities. The extent of cover should be appropriate for the value and the nature of the goods being stored and should take account of customer terms and conditions where appropriate.
10.0 10.1 K	**Storage Operations** Mammalian Meat and Bone Meal (MMBM) must not be stored on the same site as goods or additives which could enter the human/farmed animal feed chain, unless physically separated. Adequate physical separation will be determined by risk assessment on a case-by-case basis.
10.2 K	None of the materials on the Exclusion List (see Appendix 1) can be stored in the same store as goods under this code.
10.3 K	Fishmeal intended for non-ruminant livestock feed within the EU is only allowed to be stored in bulk in dedicated, registered stores (see 4.0) and, where possible, dedicated equipment should be used to handle fishmeal.
10.4 K	If any handling equipment or vehicle is used for fishmeal and is subsequently used for other products, it must be thoroughly cleaned, sanitised in accordance with Appendix 2 and inspected before and after the handling/transport of the fishmeal.
10.5 K	Bagged or bulk minerals must not be stored in the same store as other goods covered by this Code.
10.6 K	Where materials known to cause allergic reaction (see EU Directive 2007/68/EC - excluding cereals) are stored in the same store as goods which may be destined for human consumption, the owner of the goods must be informed in writing and approval obtained. (See Appendix 2.(6)). [R]
10.7 K	Flammable materials must not be stored near stocks of goods.
11.0 11.1	**Requirements for Feed Material Packing Operations in Assured Stores** Packaged Feed Ingredients
11.1.1	A stock rotation system must be in place, in agreement with the owner of the goods. [R]
11.1.2 K	A system must exist to identify out of date stock and to segregate it so that it cannot be inadvertently put into circulation. [R]
11.1.3	Fork lift operators must be instructed regarding the importance of avoiding breakages.
11.1.4	Store staff must be instructed on how to deal with breakages in a safe and hygienic manner.
11.1.5 K	Storage areas must be checked when empty and cleaned if necessary.
11.2	Equipment
11.2.1	Each item of feed related fixed equipment and (if applicable) associated bulk storage must be shown on a flow diagram which is updated when any changes take place. [R]
11.2.2	All equipment must be constructed and operated so that feed ingredients are protected from contamination.

11.2.3	There must be a maintenance plan and record for any equipment relating to feedingstuffs.
11.2.4	Weighing, measuring and monitoring equipment must be calibrated to recognised national standards at intervals not exceeding 12 months. Regular and recorded cleaning and calibration must take place according to a written schedule. [R]
11.2.5	All equipment which is used to handle feed ingredients must be kept clean. Records of cleaning and disinfecting must be maintained. [R]
11.2.6 K	Equipment used for the handling of feed ingredients must never be used for the handling of Exclusion List materials such as mammalian meat and bone meal, toxic or hazardous, materials.
11.3	Waste
11.3.1	Waste packaging material must be collected into suitable and clearly identified receptacles for removal to identified collection points away from the production areas.
11.4	Packaging Operations
11.4.1	When feed materials are being packaged, care must be taken to avoid contamination during the packaging process.
11.4.2	Packaging must be appropriate to the product type and to maintain contents for their intended shelf life.
11.4.3	Weighing machines and other equipment must be cleaned when changing between feed ingredients.
11.4.4	Where paper or plastic sacks are used these must not have had any previous use.
11.5	Big Bags and Containers
11.5.1	If "big bags" (0.5 tonne or 1 tonne) are used it is permissible to use clean containers which have been previously used for human food ingredients providing that these are inspected and seen to be free from residue and that the food ingredient is one which would be suitable for use for the species and applications for which the feed ingredient is intended.
11.5.2K	Big bags which have been previously used for deliveries to farm cannot be re-used.
11.5.3	Big bags that have been used for feed ingredients other than fish meals or animal proteins but have not been used on farms can be re-used after inspection.
11.5.4K	Big bags which have been used for Exclusion List materials, medicated feedingstuffs, or those containing specified feed additives, cannot be re-used.
11.5.5	Rigid bulk containers which can be satisfactorily cleaned must be inspected and if necessary cleaned before filling. Before receiving any deliveries by container, storekeepers must have received and act in compliance with the requirements of the relevant trader/merchant or customer Risk Assessment. The Risk Assessment should include reference to: • inspection of the container's construction, cleanliness and previous use • pressure cleaning and disinfection • the use of liners for protection of the goods • other specific requirements. Records of inspection, cleaning operations, disinfection etc., as required by the Risk Assessment must be maintained. [R]
11.6	Pallets
11.6.1	Pallets must be serviceable, clean and dry.
11.6.2	All pallets which are returned must be inspected and if necessary cleaned before re-use.
11.7	Labelling
11.7.1K	Care must be taken to use the correct labels on all packages and label details must conform to current legislation.

11.7.2	Information given on packages, labels and leaflets and by other means must be correct and not misleading.
11.7.3K	Redundant labels must be disposed of safely so that mis-labelling or confusion between batches is avoided.
11.7.4K	Each package must be labelled in such a way that the batch or run of the packaging operation to which it belongs can subsequently be identified. [R].
11.7.5	Records must be kept which link the package label to an identified batch or batches of feed material in order to retain traceability and to aid in defining the scope of any recall. [R]
11.8	Packaging Records
11.8.1	The following information must be recorded for each batch of feed ingredient packaged, as an aid to traceability: • Ingredient or product name • Origin/manufacturer/supplier • Quantity packaged • Date of packaging • Batch record/number (as shown on the package label)
11.9	Storage of bagged feed materials or containers of liquid feed materials
11.9.1	If the store is used only for the storage of bagged or sealed containers of liquid feed materials, non-feed materials may also be stored provided:- • There are designated storage areas for feed and non-feed materials with suitable physical separation between the materials. • Special care is taken to ensure liquid products in store cannot contaminate dry feed materials. Unless suitable controls are in place, liquids must not be stored above dry feed materials. • Any exclusion list materials such as those containing mammalian meat and bone meal (including pet food), toxic, or hazardous materials are not stored above or in close proximity to feed materials. • Controls are in place for any split bags paying particular attention to contamination risks and weights and measures legislation.
11.9.2	If the store is holding both bulk and bagged feed materials, there must be no non-feed materials unless covered by a biomass risk assessment.
11.9.3 K	All liquids must be within a suitably bunded or protected area (or have equivalent protection against cross contamination).
11.9.4	The HACCP risk assessment must consider the hazards arising from materials held in store. The study must include cross contamination risks between bulk and bagged materials and must include if necessary hazards from materials derived from genetically modified DNA contaminating non-GM materials or conventional commodities contaminating organic materials. Any risks identified must be adequately managed by separation of bulk and bagged products. Issues associated with spillages and breakages of bags or pallets must also be satisfactorily controlled
12.0	**Pest and Vermin Control**
12.1 K	Measures must be taken to exclude rodents from the vicinity of the site.
12.2 K	The control measures must be designed to ensure that poison baits cannot contaminate the goods. Where practical, baits should be outside the actual storage area. If shooting of vermin is part of the control programme, non-toxic ammunition must be used.
12.3	In the absence of a suitably qualified person on site, e.g. holding a recognised Pest Control qualification, stores must have a vermin control contract or adhere to a recognised set of guidance notes/rules on the safe use of rodenticides. [R]
12.4	Waste and scrap materials, old pallets, or other materials, which can encourage and harbour rodents, must be removed from the proximity of the stores. [R]
12.5 K	Precautions must be taken to discourage birds from the vicinity and to prevent their entry into stores. Wire masks must be put over ventilators and windows. (See Appendix 3)
12.6 K	Animals of any description must be excluded from stores.
13.0	**Store Management for Animal Feed Materials**
13.1 K	Regular temperature checks of not less than once per week must be made and recorded for each stack of dry goods. [R]
13.2	For each stack of dry goods evidence must be recorded of any action taken. [R]

13.3	Copies of temperature records must be made available to the owners of dry goods every week. [R]
14.0	**Store Management for Combinable Crops**
14.1 K	Regular temperature checks of not less than once per week must be made and recorded for all goods in store. Temperatures must be checked and recorded for each bulk or silo, and any unusual odours or visual signs such as mould, steam, or insect migration fully investigated and the appropriate corrective action taken. [R]
14.2 K	Any aeration fans should be run regularly when conditions are suitable in order to prevent the heating of combinable crops in store, and/or the build up of anaerobic conditions. Where no aeration facilities are available the storekeeper shall notify the customer/owner of the goods accordingly. [R]
15.0	**Store Management for all Goods**
15.1	Where temperature monitoring of goods in store is not possible due to the structure of the store or is hazardous, the store shall provide a risk assessment for the safe storage of the goods plus an ongoing assessment establishing continued safe storage. Storekeepers are required to show documentary evidence that the owner(s) of the goods in question accept storage without normal temperature monitoring but with ongoing safe storage risk assessment. [R]
15.2 K	Where a risk of rising temperature or deteriorating condition is identified, including unusual odours and visual signs such as mould, steam, insect migration, (or foaming, lumps, or crusts in liquids) these must be investigated and reported to the owner(s) of the goods plus any corrective action taken. [R]
15.3 K	Insect infestation must be reported to the owner of the goods immediately on discovery. Any infestation procedures to be used must be advised to and approved by the owner of the goods each time before they are carried out. In the event of failure by the owners to respond within 48 hours, the storekeeper must take appropriate action [R].
15.4 K	Water entry through leakage must not be allowed, as it can cause damage – for example heating, and microbial activity. If, in spite of all precautions, stored goods do become wet, they must be segregated at the earliest opportunity.
15.5	Smoking or naked lights must not be permitted within storage areas or near to goods.
15.6	Welding or other "hot work", such as burning, riveting or any other potentially combustible activity, must not be allowed in the store, unless full precautions are taken to avoid the risk of fire or explosion.
15.7	The use of explosive bird scaring devices must not be allowed within stores.
15.8	Handling methods must be such as to minimise the production of dust. This precaution is necessary to minimise the risk of fire or dust explosion, to prevent contamination and to control the spread of Salmonella.
15.9 K	There must be no deliberate admixture or contamination of the goods and so far as is possible the accidental admixture or cross-contamination of the goods must be prevented. [R]
15.10	Individual shipments of goods must be stored separately. However, storekeepers must keep formal records when the owner of the goods instructs them to store goods from one consignment with goods from other consignments. [R]
15.11K	Doors must be kept shut at all times unless loading, ventilation or other operations are taking place.
15.12K	If assured and non-assured goods are mixed for storage, the whole bulk must be regarded as being non-assured. [R]
15.13K	If GM and non-GM goods are mixed for storage, the whole bulk must be regarded as being genetically modified.
16.0	**Drying, Cleaning, Conditioning and Blending of Goods**
16.1	Where drying, cleaning, conditioning or blending is undertaken, HACCP procedures must ensure that any adverse effect on the goods being dried, cleaned, conditioned or blended is minimised.
16.2K	Where drying operations result in combustion gases coming into contact with the goods, storekeepers must be able to demonstrate that the selection of fuel(s) is appropriate.

16.3 K	Drying equipment must be regularly serviced and maintained by a demonstrably competent person in accordance with manufacturer's recommendations. For the purposes of this clause "regular" shall mean as necessary to ensure that the equipment operates at optimum efficiency and that contamination build up of residues within the equipment is avoided. [R]
16.4 K	Fuel used in oil-fired driers must meet accepted industry fuel standards and should be sourced from reputable suppliers. Waste oil must not be used under any circumstances. Full records must be kept of all fuel oil deliveries including their origin and specification. [R]
16.5	Screenings or cleanings which are to be identified or sold as 'Assured' must be produced only from goods which are compliant with an assurance scheme. Records must be kept of the operations producing the screenings or cleanings in order to demonstrate traceability of the goods. [R]
16.6	HACCP must be applied to the production and composition of screenings or cleanings which are to enter the feed or food chain to identify any potential hazards. Screenings or cleanings that contain hazardous levels of materials must not enter the feed/food chain either by blending or directly and must be disposed via an approved disposal route. Records of such disposals must be kept. [R]
16.7	Seed plants, marketing seed processing by-products/screenings must ensure that the HACCP Risk Assessment considers controls to ensure that materials treated with Seed Dressings are not allowed to enter the food/feed chain.
16.8	A sample must be taken of each load of screenings or cleanings at the time of loading when the screenings are to be supplied for feed/food use. Samples must be retained for a minimum of three months.
17.0 K **NEW**	**Monitoring of Undesirable Substances** · **Salmonella** Requirements for sampling and testing of goods for the presence of salmonella are set out in Appendix 4 and apply to all goods stored under this Code of Practice. For goods stored and handled in the UK the Defra Code of Practice for the Control of Salmonella applies. · **Other undesirable substances** In EU legislation undesirable substances are any substance or product, with the exception of pathogenic agents, which are present in product intended for animal feed which presents a potential danger to animal or human health or to the environment or could adversely affect livestock production. Reg 2002/32 EC applies. A principal in a storage or handling contract may require that storekeepers undertake sampling and to submit for analysis samples for the testing for undesirable substances. A number of Feed Safety Assurance Schemes operating in the trade incorporate requirements for testing of contaminants. Where such testing is required a monitoring plan should be drawn up between the parties involved in the storage contract. Sampling and analysis is generally influenced by risk assessment and product data sheets are required. Risk assessment of commodities for storage and handling are likely to be affected by material and origin specific risks. The monitoring plan should include: a) The procedure for and the frequency of the sampling (see also Gafta No. 124 Sampling Rules) b) The Analysts which are chosen for the analyses in question. c) The frequency of analyses, checks and inspections. d) The instructions for carrying out inspections and checks. e) The personnel who are responsible for carrying out the monitoring activities. f) The personnel responsible for releasing the goods. Results of analyses obtained from the monitoring programme must be made available to the storekeeper and to the owner of the goods.
18.0 18.1 K	**Use of Pesticides and Fumigants** Where it is necessary to use pesticides or fumigants on stored goods, only chemicals approved for use can be used and applied according to the manufacturer's instructions. Storekeepers must notify and check that products proposed to be used are also approved by the owner of the goods.
18.2 K	Pesticide use must be recorded, and must be declared on documents accompanying the goods, e.g. the Post Harvest Declaration Form. [R]
18.3 K	Pesticides stored on site must take account of best practice guidance on storing pesticides in the country in which this Code is being applied.

18.4	Guidance notes for users of fumigants are available from Gafta as a separate document, titled 'Pest Control and Fumigation'.
19.0 NEW	**Customer Requirements** Within the trade there are a number of safety schemes for food and feed in operation. Requirements of food/feed safety schemes may vary in relation to specific conditions under which storage must take place. Storekeepers and handling facilities must ensure that they understand and comply with any specific requirements of the relevant food/feed safety scheme in which the goods are being stored. It is the responsibility of the principal in a contract for storage (the customer) to give precise instructions regarding any specific requirements that exist if these are not already covered by this Code of Practice. This may include introducing a sampling and analysis plan for the analysis of goods for the presence of undesirable substances (see 17.0).
20.0 NEW	**Acceptance of a Storage Order** Storekeepers must have a documented procedure for accepting a storage order. The procedure must include details of the type of goods to be stored (data sheets etc), whether such goods are Exclusion or Contaminant Sensitive goods and any cleaning requirements. The order should also take into account any special requirements of the customer with regard to food and/or feed safety schemes or special buying terms that are relevant to the storage of the goods.
21.0	**Collection and Delivery (intake) of Goods**
21.1	Intake of goods
21.1.1	All delivery vehicles must be visually inspected on arrival for general cleanliness. Vehicles must be sheeted on arrival. Trailer identification numbers must be recorded.
21.1.2 K	The previous three loads carried by the delivery vehicle must be checked against the Exclusion and Contaminant Sensitive Lists. Where a delivery vehicle has carried a material on the Exclusion List, the load must be rejected and the owner of the goods notified by the storekeeper. [R] Where materials from the Contaminant Sensitive List have been carried, the storekeeper must check the cleaning records. Where cleaning records are not available for checking the load must not be tipped until written clarification has been received by the storekeeper or owner of the goods and a risk assessment has been made.
21.1.3 REV	All deliveries must be accompanied by correctly completed and appropriate delivery documentation. Where such documentation lists treatment of the goods with pesticides these must be checked against the approved list of pesticides. Note: in the UK the appropriate document is known as the "Combinable Crops Passport" (Grain Passport).
21.1.4 REV K	Only combinable crops grown under a recognised grower assurance scheme and clearly identified as such on the delivery documentation (often by the affixing of an assurance sticker), may be considered as being assured and stored and re-delivered accordingly.
21.1.5 REV	Where delivery vehicles are to be analysed they must be sampled and tested in accordance with agreed, written procedures and in accordance with instructions received from the owners of the goods. Goods sampled for salmonella testing must be sampled in accordance with the applicable Code of Practice for the Control of Salmonella (see Appendix 4).
21.1.6	The storekeeper must clearly advise the driver of the delivery vehicle where to proceed to offload.
21.2	Collection of goods
21.2.1 K	Vehicles arriving to collect goods must be inspected before loading and details recorded to ensure that they are in a clean and dry state, including the load carrying area and, where appropriate, blowing equipment (See Appendix 2). Where sensitive list materials have been carried and the trailer has not been cleaned in accordance with the requirements of the sensitive list, the storekeeper must not load the vehicle until written clarification has been received by the storekeeper or owner of the goods and a risk assessment has been made.
21.2.2	The previous three loads must be recorded and assessed for compatibility by a competent person. Generic terms like "biomass" should not be accepted. The description of goods should be as precise and detailed as necessary to accurately describe the goods. [R]
21.2.3	Should the lorry be deemed unfit for carrying the goods, the storekeeper should immediately contact the holder of the delivery order. [R]
21.2.4	Exposed ends of blower/tanker hoses must be capped when not in use. Should the lorry be deemed unfit for carrying the goods, the storekeeper should immediately contact the holder of the delivery order. [R]

21.2.5 K	Loaded vehicles must not be allowed to leave the site until covered with sound, clean and dry sheets. On vehicles carrying liquids, tank lids must be securely closed prior to leaving the site.
21.2.6 REV	All deliveries and collections of goods must be accompanied by an appropriate collection or delivery note (UK - grain passport). Where a pesticide has been applied to the goods in store this must be declared on the collection note. Stickers applied to collection notes to identify goods that are "assured" may only be applied to combinable crops that can be demonstrated to have been grown under a recognised grower assurance scheme.
21.2.7	Representative samples of loads entering and leaving premises must be retained for a minimum period of 3 months.
21.2.8	Samples of loads taken at the point of intake/delivery must be bulked in accordance with the requirements for Salmonella testing as set out in the appropriate Code of Practice for the Control of Salmonella. [R]
21.2.9 K	A recordable system for the traceability of all loads delivered and collected must be in place within the store. This must take into account the assurance status of the goods. [R]
22.0	**Personnel**
22.1	Personnel must be made aware of the importance of this document, all relevant regulations and the relevant Code of Practice for the Control of Salmonella.
22.2	Proper toilet and washing facilities must be near to their workplaces, and must be kept clean.
22.3	Eating and drinking should only be permitted in designated areas.
22.4	No person known to be suffering from a communicable enteric disease should be employed in the handling of goods.
22.5 K	Operators and contractors using pesticides must be aware of any appropriate national regulations for the Control of Pesticides Regulations and if required have the necessary Certificate of Competence. [R]
22.6	Operators' non-disposable clothing must be contract cleaned or laundered regularly for the control of Salmonella. For the purposes of this clause "regularly" is not precisely defined since cleaning should take into account the conditions of usage of the non-disposable clothing. More frequent cleaning will be required for clothing exposed to very dirty conditions. [R]
22.7	Personnel must be trained in the relevant standards of safety and hygiene. [R]
22.8	Visitors and contractors must be informed of the hygiene requirements of the site and sign an appropriate form. [R]
22.9	All non-essential personnel to store operations or store maintenance, or not directly involved in collection or delivery of goods or materials, should be excluded from the store.
23.0	**Training**
23.1 K	The successful operation of this Code of Practice cannot be achieved without training of personnel. Storage operators should identify the training needs and ensure that the appropriate training is provided. Such training should include as a minimum: • a full understanding of the purpose and detailed requirements of this Code of Practice • any in-house procedures for the implementation of this Code of Practice • basic awareness of food safety and hygiene disciplines • personal hygiene • Code of Practice for the Control of Salmonella
23.2	Training must take place regularly (normally on an annual basis), be kept up-to-date and documented. [R]
23.3	Training may be carried out on an in-house basis.
24.0	**Security**
24.1 K	The storekeeper must be able to demonstrate the safety and security of the goods in his care.
24.2	The storekeeper must ensure that the appropriate release is given and collection documents provided before the goods are released. [R]

25.0 25.1	**Procedures and Instructions** A designated person must have authority and responsibility for the implementation of the requirements of this Code of Practice.
25.2	The designated person must ensure that all staff covered by the scope of the Code of Practice are provided with written instructions that confirm their duties and the procedures. [R]
25.3	The designated person shall keep an organisational chart listing all staff employed, their positions and their functions within the store operation.
26.0 26.1	**Self-Assessment Procedures** Storekeepers must have a documented procedure for self-assessment. The procedure must require the storekeeper to carry out a programme of planned self-assessments to check that internal systems are operating as intended and are also effective. Such self-assessments must encompass: • Compliance with the requirements of this Code of Practice • Compliance with the requirements of the storekeeper's HACCP system • Compliance with the storekeeper's formal procedures • Compliance with applicable legislation pertaining to Feed and Food safety and quality • Satisfaction of specified customer requirements • Recording of non-conformances and steps taken to prevent re-occurence. • A documented procedure for controls, associated responsibilities and competences for dealing with non-conformances.
26.2	The programme of self-assessments must ensure that all relevant activities are audited at least once a year.
26.3	All personnel carrying out self-assessments must be trained, and be able to demonstrate their effectiveness in the role.
26.4	Self assessments must be formally reported to those with responsibility for the area audited and record any aspects where the operations are not in compliance with operational requirements. Such areas of non-compliance must be corrected within an agreed timescale and the report records updated by an authorised person to indicate that problems have been corrected satisfactorily. [R]
27.0 27.1 K	**Material Recall and Crisis Management** In the event of a problem occurring which may threaten the safety and security of the goods delivered from store, storekeepers must have adequate records to enable them to identify all goods potentially at risk and provide the owner with sufficient information to notify all those customers who may consequently be affected.
27.2	The responsibilities and mechanisms for issuing warnings or recalls of goods must be clearly defined and the required traceability tested at least annually for adequacy. Records of such tests must be kept and any corrective actions that arise must be implemented and recorded. [R]
27.3 K	Goods that have been rejected, recalled or returned should be placed in separate and adequately segregated storage to prevent cross contamination of other goods in store.
28.0	**Complaints Procedure** The storekeeper must document the procedure for handling complaints. [R] This procedure must include systems for: • The prompt documentation and investigation of complaints • The prompt feedback to the Company with findings • Deciding on the internal actions required to prevent re-occurrence.
29.0	**Arbitration** In the event of a problem, and in the absence of an arbitration agreement, recourse for settlement of claims will be to the appropriate Court. Alternatively, the parties in dispute may agree to arbitration in accordance with the Gafta Simple Dispute Rules Form 126 (available as a separate document).

APPENDIX 1

Exclusion List

The following materials must never be stored with goods covered by this Code of Practice, due to their toxic nature and/or risk of contamination. Additionally, the following materials must not have been carried in vehicles used for the transportation of goods covered by this Code.

- Toxic and corrosive materials and any packaging used for these materials or any materials (e.g. timber) treated with these products
- Radioactive materials
- Livestock including poultry, including their carcasses
- Animal and poultry wastes
- Manures, litter and composts* see note below
- Mammalian protein, including any feed containing these materials e.g. (a) mammalian protein (including greaves), other than processed animal protein (see below), derived from the whole or part of any dead mammal by the process of rendering; or (b) any material derived from mammalian protein, and for this purpose "protein" means any proteinaceous material which is derived from a carcass but does not include milk or other milk products
- Mineral clays which have been used for detoxification purposes
- Cereal and other seeds treated with toxic dressing
- Glass (including cullet) and products thereof
- Hide treated with tanning substances, including its waste
- Scrap metal, including fragmented metal and "frag rubber"
- Used or "old" tyres
- Solid urban waste, such as household waste, including products processed from this material
- All wastes obtained from the various phases of the urban, domestic and industrial waste water treatment process, irrespective of any further processing of these wastes and also irrespective of the origin of the waste waters
- Untreated waste from eating places, except food stuffs of vegetable origin considered unsuitable for human consumption for reasons of freshness
- Bituminous products e.g. tar chips, tarmac planings and some recycled aggregates
- Other products not responsive to normal detergent cleaning
- Processed animal protein, e.g. meat and bone meal, meat meal, bone meal, blood meal, dried plasma and other blood products, hoof meal, horn meal, poultry offal meal, feather meal, dry greaves, and any other similar products, and includes mixtures, feedingstuffs, feed additives and premixes containing these products
- Asbestos or materials containing asbestos
- Pharmaceutical waste
- Recycled materials e.g. aggregates containing (inter alia) bitumen, scrap metal, plastics and glass.**

** Store facilities that have stored manures, litter and composts but no other materials on the Exclusion List may be able to re-enter the scheme by undertaking cleaning in accordance with Appendix 2. Please contact the scheme auditors for further information.*

*** Storekeepers are strongly advised to obtain product data sheets relating to recycled materials to establish their make up before agreeing to store those goods, in case they constitute a breach of this Code.*

APPENDIX 2

Contaminant Sensitive List and Cleaning Instructions

1 Pressure Cleaning/Disinfecting

Stores must be pressure cleaned with a hot (70-80c) solution of any combined food grade detergent/disinfectant diluted in acccordance with manufacturer's recommendations, after they are used for storing the goods listed below.

Proof will be required to be given that appropriate cleaning operations have been undertaken [R]:-

- Tallows/used cooking oils
- Strong smelling materials, excluding fishmeals (see 5 below)
- Animal-derived dicalcium phosphate and hydrolysed protein produced in plants authorised by the competent authority in accordance with Animal By-Products Regulations
- Any product known to be Salmonella positive
- Food stuffs of vegetable origin considered unsuitable for human consumption for reasons of freshness
- Packaging and parts of packaging from products used in agriculture or the food industry
- Silage

2. Washing/Brushing/Vacuuming

Proof will be required to be given that appropriate cleaning operations have been undertaken when the following materials have been stored prior to the storage of goods covered by this Code. In most cases where the material is dry, thorough brushing or vacuuming will be sufficient. However if the material is caked or damp, washing will be necessary [R]:-

- First time quarried aggregates/stone - not including bituminous or recycled products (see Exclusion List).
- Coal/fly ash/coal by-products
- Fertiliser
- Medicated feed products
- Sheeted or unsheeted Root crops and fruit (subject to risk assessment)
- Salt
- Untreated wood, sawdust or other materials derived from untreated wood
- Peat
- Clean and un-used rubber bedding (including playground and arena mixes)
- New tyres

3. Moist Co-Products

Buildings that have stored moist co-products must be cleaned and disinfected with a food grade disinfectant before storing dry products. [R]

4. Infested Products

Buildings which have stored infested products must be thoroughly steam cleaned. Proof will be required to be given that appropriate cleaning operations have been undertaken and they must be recorded. The use of smoke bombs is not likely to be effective and is not recommended. [R]

5. Fishmeal

Where applicable, in accordance with EU Animal By-Products Regulations, only fishmeal which has been produced in plants authorised by the competent authority is permitted to be stored under this Code.

If a building is used for the storage of fishmeal and is subsequently used for the storage of other products, it must be thoroughly cleaned and disinfected. [R]

6. Materials Causing Allergic Reaction

Certain materials or goods can cause allergic reaction in humans which in extreme cases can be fatal. Storekeepers must advise the owners of any goods being stored (that are destined for human consumption) in writing and obtain approval before storing such goods. Products recorded as causing allergic reaction include:
molluscs/crustaceans/eggs/fish/nuts/celery/mustard/sesame seeds and lupin seeds. Note: this list is not intended to be exhaustive. See EU Directive 2007/68/EC

7. Naturally Occurring Prohibited Substances (NOPS)

NOPS are substances which can occur naturally in raw materials such as Hordenine from sprouting barley, Morphine from poppies and Atrophine (nightshade). NOPS are prohibited in race horse feeds with a no threshold policy.
Those involved in the production, storage or handling of equine feedingstuffs should inform their customers/suppliers if any of these products are being handled.

APPENDIX 3

Guidance Note for the Control of Birds

1. Newcastle Disease ('Fowl Pest'), Avian Influenza, Avian Tuberculosis and other diseases may all be carried by wild, domestic and feral birds. In addition, birds can be carriers of Salmonella and other pathogens harmful to both livestock and humans. It is therefore crucial to take all reasonable precautions to exclude birds from areas where goods are produced, handled, stored or consumed.

1.1 The presence of any species of bird in the vicinity of goods must be considered potentially hazardous in risk assessment studies.

1.2 Birds may be attracted to areas for three main reasons: availability of food; availability of shelter and roosting sites; availability of nesting sites. Wherever possible birds must be denied these.

1.3 Making a site unattractive to birds is likely to be more effective in the long-term than trying to control birds already active on the site.

1.4 Wherever possible, birds should be deterred rather than destroyed. Destruction of any bird species must always be a last resort and is not acceptable for any protected species. Where shooting is necessary as a last resort, lead-free ammunition must be used.

1.5 Where netting is used to deter birds, wire netting is preferable to string netting, as it is less likely to tangle birds.

2. Circumstances will vary with individual situations, but in general terms the following guidelines will be applied by assurance schemes:

2.1 The presence of birds, or evidence of nesting or roosting sites in process and storage buildings is not acceptable.

2.2 Where birds are a problem, active programmes must be in place to reduce access to food and shelter.

2.3 Doors must be kept closed whenever possible. It is recognised by the industry that operators of flat stores may need to keep doors open for extended periods. Should birds enter stores at these times, they must not be allowed to settle and must be removed as promptly as possible.

2.4 Where necessary, the eaves of buildings must be proofed against bird access.

2.5 Windows that are habitually left open must be screened or caged to prevent access by birds.

2.6 Spillages of goods must be promptly removed to avoid attracting birds.

2.7 Containers utilised to hold edible waste, such as skips and bins, must be covered to prevent access to birds.

2.8 Any birds gaining access to buildings must not be allowed to settle and must be removed as promptly as possible. Access points must be discovered and effective remedial action taken.

2.9 Intakes and loading points must be enclosed or covered when not in use.

APPENDIX 4

Salmonella Sampling and Testing Procedure (UK version)

The aim of the monitoring is to check on the environmental hygiene of the premises, equipment, incoming and outgoing products and, if necessary, take corrective action.

The buildings, environment, plant and equipment, as well as incoming and outgoing product, must be subject to appropriate monitoring. Sampling schedules should take account of:

1. Intended use;
2. Inherent bacteriological risks;
3. Nature and sources; and
4. Past results

Please refer to the Salmonella code for full details, the following is a suggested appropriate sampling regime.

1. Storekeepers must arrange for samples to be taken from goods and analysed, where this is not done by the owner of the goods, as follows:

a. Incoming goods. The frequency of sampling should be based on high, medium and low risk- composite samples are acceptable by product type. Data may already be available from the supplier or owner of the goods. For high risk products every load should be sampled. From a historical analysis of Defra data, isolations (weighted by tonnage) have been most frequent in rape, fishmeal, cocoa and soya beans and their derivatives.

b. Outgoing goods. Manufactured products by product or process type-composite samples are acceptable, frequency based on high, medium and low risk also taking into account the processing carried out.

c. Samples must be drawn into a new clean bag using the "reverse bag" sampling method as a minimum. A minimum sample size of 60g is required but the exact requirement should be agreed with the testing laboratory.

2. Storekeepers must arrange for the following samples to be taken and analysed as follows:

a. Buildings. Samples from ledges, walls, floors, storage bin tops and outloading areas and where health and safety rules allow-samples from dust units, vacuum cleaners and the inside of storage bins may be included. Samples of dust can be taken direct into a "reverse bag" or sterile pot or, if quantities are too small, by using swabs. Dust samples are normally much more effective than swab samples and are therefore preferred. The sampling points must be determined using HACCP risk assessment principles. Samples from common equipment areas such as vacuum cleaners and dust units are useful to determine the overall salmonella risk in the storage area.

b. The best method of sampling is to take approximately 20g bulked samples comprising dust from at least ten places around the building. These can be taken into an inverted polythene bag or with new disposable plastic gloves. Where dust levels are insufficient for 20g then a greater number of sampling places may be used. The use of a brush is not recommended to help collect samples unless it can be washed in a sterilising solution and fully dried; a plastic scraper washed in a sterilising solution and dried may help in the sample collection.

c. If swab samples are utilised they must be taken with sterile swabs according to the supplier's instructions. Swabbing normally consists of wiping of the swab (after removal from its transportation tube) over as large and representative an area as practicable until the swab is well coated with dust, or accumulated aggregate within equipment.

   Disposable wooden scrapers or plastic spoons can also be used to sample adherent material. The sample is returned to the tube and labelled with details of the sample area and date of sampling.

d. Frequency of sampling should be based on risk assessment. For a high risk product weekly testing is recommended. If the risk status of the product cannot be determined it should at least initially be considered as high risk.

e. Plant and equipment. Loading equipment, elevators, conveyors, dust filters, intake and loading areas in stores - either dust or swab samples. Frequency of sampling based on risk assessment - weekly suggested when materials are of unknown or high risk.

f. Vehicles. Buckets and vehicle bodies of loading shovels – dust or swab samples.

3. Analysis

a. Samples must be tested in accordance with approved methods laid down in The Animal By-Products Regulations 2005 (SI No 2005/2347) at a Defra listed laboratory that is approved under those regulations or to ISO 17025 standards.

4. Action to be taken following isolation

a. The following should be advised of isolations of Salmonella:
   i. Defra and, where appropriate, the relevant devolved administrations (the Zoonoses Order 1989 requires laboratories to report all isolations of Salmonella from animal/poultry feedstuffs and ingredients to Defra).
   ii. If incoming goods are found to be positive then the storekeeper must immediately discuss remedial action with the owner of the goods.

b. Where there is contamination with a regulated serovar*, or where the same serovar is regularly detected over time, then detailed investigation to identify the source or to ensure there is no ongoing contamination is recommended. If there is persistent contamination samples should be taken and tested after any remedial action.

c. Increasing the level of testing of the product should be considered.

d. Further actions are detailed in the Defra Code of Practice for the Control of Salmonella and will depend on the circumstances of isolation.

** Regulated serovars are those of major public health significance. Currently these are S. Enterditis, S. Typhimurium, S. Infantis, S. Virchow and S. Hadar.*

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