

QUALIMAT TRANSPORT OFFICIAL POSITIONS

Date of last modification	10/11/2022 - Official Position No 2-004
Date of application of the last modification	See each Official Position



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Purpose and scope

The purpose of this document is to clarify or interpret certain points in Qualimat Transport reference documents:

- Qualimat Transport Specifications
- Qualimat Transport Regulations for Third-party Recognition
- Collaboration agreement between OC and Qualimat

The document is for the use of all stakeholders identified in the Qualimat Transport Regulations for Third-party Recognition.

Each official position is shown with its effective date.

Official Positions

For each Official Position, the following is specified:

- An indexing number,
- A theme,
- The relevant Reference Document,
- The question exposed,
- The Official Position adopted,
- The date of creation/modification,
- The date of application.

**Official Position No 1-001
Provisions relating to mutual recognition**

Theme 1	Scope and limit of Qualimat Transport listings
Reference document	Qualimat Transport Specifications §1

Problem identified:

When a transport operator is being audited, how do they know if the provisions relating to mutual recognition between different standards (Qualimat Transport, OVOCOM, POS, QS etc.) have been checked?

Official Position adopted :

Each holder of standards has a specific protocol for displaying mutual recognition. For transport operators certified by Qualimat, the information must appear on the first page of the audit report in the "comments" box, using the words "for this audit, all requirements relating to mutual recognition with the xxx standards have been audited, with particular reference to compliance with the most stringent level of cleaning". In order to check or demonstrate that mutual recognition has been observed, the transport operator should send the audit report to the applicant. (There are no plans to draw up a list of this information.)

Date created : 12/10/2010
Effective date : 12/10/2010

Official Position No 1-002
Provisions for companies with several operating sites

Theme 1	Scope and limit of Qualimat Transport listings
Reference document	<u>Regulations on third-party recognition §3.1.3</u>
<p><u>Problem identified:</u></p> <p>Section 3.1.2 of the Regulations on third-party recognition states “For transport operators operating from multiple sites, branch sites cannot be covered by the certificate issued for the registered office or for another site, when these sites only were audited. Each site must establish a confirmation of commitment and be audited separately”.</p> <p>How does this requirement apply in the case of companies that operate as a cooperative?</p> <ul style="list-style-type: none"> a) Which sites have to be registered and audited? b) Can registered sites operating as a cooperative be audited at the same time? c) What does the certificate issued cover? d) What contact details should appear on the transport documents ? 	

<p><u>Adopted Official Position :</u></p> <p>A cooperative operation involves total or partial sharing of the human, material and organizational resources owned by the transport operators as a common entity.</p> <ul style="list-style-type: none"> a) In a cooperative, any operating site that wishes to obtain Qualimat Transport certification must submit a confirmation of commitment and be audited by an authorized certifying organization. b) Under annex 3 of the Regulations on third-party recognition, the length of an audit is calculated in respect of the registered operating entity only. Audit periods cannot be shared. c) The certificate for an entity operating as part of a cooperative does not cover all the resources that are shared by the common entity. d) The contact details for the registered operating entity with a Qualimat Transport certificate must appear on the transport documents. The contact details for the cooperative may also appear.
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Date created:	17/10/2019
Last updated:	01/02/2022
Effective date:	15/03/2022

Official Position No 2-001
Elements of level D cleaning

Theme 2	Cleaning of containers
Reference document	<u>Qualimat Transport Specifications §7</u>

Problem identified :

Le § 7.2 of the Qualimat Transport Specifications indicates for level D that: "Where necessary, level D cleaning must take place between each new loading of "products" regardless of the number of intermediate transportations". How does this differ from the other cleaning levels?

Adopted Official Position :

The level of cleaning depends on the nature of the hazard (physical, chemical or biological) and the risk assessment that these goods may represent for "products" subsequently transported in the same container.

- for biological hazards (*microorganisms that can multiply and contaminate a product transported subsequently*), level D cleaning (*B or C level washing followed by disinfection*) is essential to eliminate the risk, regardless of the number of intermediate transportations (*because microorganisms can persist in the container*).
- for chemical or physical hazards (*undesirable substances or foreign bodies*) requiring level A, B or C cleaning, the hazard does not proliferate over time and subsequent transportations of goods will exert a mechanical action on the container. For this reason, a decay-time rule is applied for cleaning levels C, B and A where the goods do not constitute "products". Thus, there is a sequence [*level C goods (no cleaning) → level B goods → goods cleaning B → "product"*] in accordance with the Qualimat Transport Specifications.

Note: the results of the cleaning must comply with the objectives in section 7.2 of the Qualimat Transport Specifications in all circumstances. In addition, the decay-time rule does not apply to prohibited goods under any circumstances.

Date created : 18/12/2012
Effective date : 02/05/2014

**Official Position No 2-002
Choice of detergent / disinfectant**

Theme 2	Cleaning of containers
Reference document	<u>Qualimat Transport Specifications §7</u>

Problem identified :

- a) In §7.2 of the Qualimat Transport Specifications, what is meant by a detergent or disinfectant "approved" for food contact?
- b) On the "e-phy" website for disinfectants, what kind of activity should be considered acceptable?

Adopted Official Position:

- a) A detergent and/or disinfectant is referred to as "approved" for food contact in the Qualimat Transport Specifications if it is authorized for this purpose by the competent authority. As such, it must appear on the list annexed to the 8 September 1999 decree relating to "cleaning products used", amended by the decree of 19/12/2013 (the product label or technical data sheet for it states "conforms to the decree of 08/09/1999 amended on 19/12/2013" or "conforms to the decree of 19/12/2013").

Disinfectants listed under product type TP04, "Disinfectants for surfaces in contact with food and feed" (on the Simmbad website), conform to the decree of 19/12/2013. For disinfectants not listed as type TP04, their conformity with food contact is as stated on the product label or technical data sheet.

- b) The e-phy website no longer hosts detergent and disinfectant products authorized for food contact since it was updated in March 2016. This site is now only used for phytopharmaceutical products.

Date created:	18/12/2012
Last updated:	16/05/2018
Effective date:	01/07/2018

**Official Position No 2-003
Enregistrement des heures de purge**

Theme 2	Cleaning of containers
Reference document	<u>Qualimat Transport Specifications §7.2.2</u>

Problem identified :

Is it only necessary to record purges required under section 7.2.2 of the Specifications (Cleaning records), i.e. purges required between ordering parties with different orders, or also for additional purges carried out in compliance with special instructions from the ordering party?

Adopted Official Position:

Version 6 of the Qualimat Transport Specifications requires a purge to be carried out in the event of successive loadings of foodstuffs from different ordering parties (note 3 in §7.2.1). The requirement to record this type of purge is described in §7.2.2, Cleaning records. The recording requirement only applies to purges carried out in compliance with the Specifications. For other types of purge imposed by the ordering party: if the ordering party gives specific instructions to record the purge, transport operators must comply, as it will be checked by auditors.

Date created: 16/05/2018
Effective date: 01/07/2018

Official Position No 2-004
Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed “products”.

Theme 2	Cleaning of containers
Reference document	Qualimat Transport Specifications, annex 3, step 5
<p>Problem identified :</p> <p>The Qualimat Transport specifications (annex 3 step 5 - Checking the effectiveness of cleaning and disinfection), indicates: “The nature of the goods that necessitated the redeployment protocol may justify a search for other analytical parameters”.</p> <p>a) For goods in the IDTF “prohibited” category, how should the analytical parameters for the final rinse water be determined to ensure a container has undergone an effective cleaning and disinfection protocol?</p> <p>b) What are the maximum acceptable limits for the analytical parameters used in checks?</p> <p>c) Are there any special cases?</p>	

Adopted Official Position :

- a) The analytical parameters vary according to the nature of the goods classified as “forbidden” in the IDTF.

There are three main families of contaminant listed in the Qualimat Transport guidelines in respect of the cleaning and disinfection protocol to be carried out prior to redeployment of containers, as follows:

• **Contaminant families:**

- Microbiological contaminants:
 - Salmonella
 - Enterococci
 - E. coli
 - Sulfite-reducing anaerobes
- Heavy metals
 - Arsenic
 - Cadmium
 - Fluorine
 - Lead
 - Mercury
- Polycyclic aromatic hydrocarbons
 - Benzo(a)pyrene
 - Benzo(a)anthracene
 - Benzo(b)fluoranthene
 - Chrysene

Other contaminants: other specific parameters may also need to be applied, depending on the type of the goods classified as “forbidden” in the IDTF and requiring a cleaning and disinfection protocol. These parameters are indicators of contamination. In this case, the analytical laboratory recommendations relating to sample size must be observed.

The parameters to be applied according to the goods previously transported are listed in annex 1 of this official position.

- b) The **maximum limits for analytical parameters** to be checked in respect of final rinse water analysis depend on the thresholds identified in European regulations and professional standards. These thresholds appear in **annex 2** of this official position.
- c) There are a number of **special cases** to be highlighted:
 - i. IDTF “forbidden” goods **containing contaminants which are not listed in annex 1**

Certain IDTF “forbidden” goods may contain contaminants controlled under **annex I of Directive EC 2002/32** but not mentioned in **annex 1** of this official position. This information can be obtained from documents issued by the supplier of the IDTF “forbidden” goods (technical data sheet, safety data sheet, analysis report). Where the presence of these contaminants is confirmed, a search for them must be carried out as part of the cleaning and disinfection protocol prior to redeployment.

The lowest maximum residue limit (MRL) listed in annex I of Directive EC 2002/32 establishes the critical limit that must not be exceeded in the analysis of the final rinse water in the cleaning and disinfection protocol prior to redeployment.

Example: a transport operator wants to redeploy a container that has previously transported auto shredder residue (IDTF number 10122). A chemical analysis report issued by the supplier of the IDTF forbidden goods clearly shows contamination by dioxins and PCBs. A search for the 3 families of dioxins and PCBs must therefore be carried out as part of the cleaning and disinfection protocol prior to redeployment. The critical limits to be applied are the lowest maximum residue limits (MRLs) defined in annex I of Directive EC 2002/32 for these contaminants, i.e. 0.75 ng/kg (dioxins), 1.25 ng/kg (sum of dioxins and PCBs) and 10 ng/kg (PCBs other than dioxins).

- ii. Goods **not classified** in the IDTF

If the goods requiring the observance of a cleaning and disinfection protocol prior to redeployment are not classified in the IDTF, the transport operator must submit a **request for classification** to Qualimat indicating, where applicable, the relevant analytical parameters.

- iii. The cleaning and disinfection protocol for redeployment of a **used container** (purchased, rented or rental return) for which the transport history is not known.

If a transport operator introduces a second-hand container (purchased, rented or rental return) without obtaining its transport history for the 12 months prior to its inclusion in the vehicle park and/or the written confirmation required under official position 4-002, a search must be undertaken for the **contaminants defined in item a)** of the present official position in the final rinse water when the cleaning and disinfection protocol prior to redeployment is carried out.

- iv. IDTF “forbidden” goods for which the cleaning and disinfection protocol prior to redeployment is **not authorized**

When certain types of goods have been transported, any further deployment of the container is prohibited under the Qualimat Transport specifications. For these goods, the IDTF cites the following Qualimat stipulation: “**FORBIDDEN, redeployment protocol not authorized**”.

Date created :	01/02/2022
Last updated :	10/11/2022
Effective date :	10/03/2023

Official Position No 2-004
Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed “products”.

Annex 1: Minimum analyses to be carried out on the final rinse water as part of a cleaning and disinfection protocol prior to redeployment when a container has transported goods classified as “forbidden” in the IDTF

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		<i>Yes: analysis to be carried out No: analysis not required</i>			
Mineral clay that has been used for detoxification (decontamination, etc.)	10008	No	No	Yes	No
Used thermal mud	10156	Yes	No	No	No
Sludge from settling tanks	10121	Yes	No	No	No
Solid recovered fuel (SRF)	10143	Yes	No	No	No
Industrial waste	10132	Yes	Yes	Yes	Mineral oil saturated hydrocarbons
Technical fats and industrial lubricants of mineral origin	10133	No	No	Yes	Mineral oil saturated hydrocarbons
Mineral sand-gravel mixture, bound with an unknown hydraulic binder	10124	No	Yes	No	No
Mineral sand-gravel mixture bound with a hydrocarbon binder (bituminous binder)	10125	No	Yes	Yes	No
Hydraulically bound mixtures with aggregates that are unknown or forbidden for transport (according to IDTF)	10126	No	Yes	Yes	Mineral oil saturated hydrocarbons
Hydraulically bound mixtures with hydrocarbon binder (bituminous binder)	10127	No	No	Yes	No
Auto shredder residue	10122	No	Yes	Yes	Mineral oil saturated hydrocarbons
Sawdust impregnated with products which are classified as forbidden (lubricants, etc.)	10135	No	Yes	Yes	Mineral oil saturated hydrocarbons

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Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed “products”.

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		<i>Yes: analysis to be carried out No: analysis not required</i>			
Soil containing products which are classified as forbidden load	10136	No	Yes	Yes	Mineral oil saturated hydrocarbons
Organic soil improver containing processed sewage sludge	10123	Yes	No	No	No
Organic fertilizers or soil improvers containing a forbidden product for transport	10115	Yes	Yes	Yes	No
Organic fertilizers or soil improvers containing animal manure not demonstrably originating from an approved plant (Reg. (EC) 1069/2009)	10063	Yes	No	No	No
Animal manure not originating from an approved plant (Reg. (EC) 1069/2009)	10001	Yes	No	No	No
Worm compost	10064	Yes	No	No	No
Fresh mushroom substrate (before pasteurization and cultivation)	10003	Yes	No	No	No
Garden soil/potting soil treated with animal manure or with fertilizers and soil improvers which are classified as forbidden load	10002	Yes	No	No	No
Chlorinated esters	10151	No	No	No	Chlorinated esters
Polycyclic aromatic hydrocarbons, chlorinated hydrocarbons	10150	No	No	Yes	Chlorinated hydrocarbons
Apiculture by-products, if not described elsewhere in the IDTF	10072	Yes	No	No	No
By-products from aquatic animals, if not described elsewhere in the IDTF	10080	Yes	No	No	No
Used alumina	10141	No	Yes	No	Aluminium
Asbestos or materials containing asbestos	10012	No	No	No	Asbestos

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Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed “products”.

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		<i>Yes: analysis to be carried out No: analysis not required</i>			
1-Octadecenylsuccinic anhydride	10144	No	No	No	1-Octadecenylsuccinic anhydride
Anthraquinone	10140	No	No	No	Anthraquinone
Asphalt and asphalt rubble	10010	No	No	Yes	No
Tar-free asphalt, new or rubble	10147	No	No	Yes	No
Car batteries	10065	No	Yes	No	No
Bitumen	10129	No	No	Yes	No
FCC (Fluid Catalytic Cracking) catalyst powder, used	10116	No	Yes	Yes	No
Filler fly ash	30450	No	Yes	No	Dioxins and PCBs
Fly ash, if not described elsewhere in the IDTF	10139	No	Yes	No	Dioxins and PCBs
Spent activated coal	10030	No	Yes	Yes	No
Alkanes, C14-17, chloro	10145	No	No	No	Alkanes, C14-17, chloro
Alkyl dimethyl hydroxyethyl ammonium chloride	10050	No	No	No	Alkyl dimethyl hydroxyethyl ammonium chloride
Petroleum coke - petrocake	10007	No	Yes	Yes	No
Empty packaging of fertilizers and treated seeds	10146	Yes	No	No	Cypermethrin Deltamethrin Piperonyl Butoxide
Gypsum/gypsum (calcium sulfate dihydrate) after filter use	10070	No	Yes	No	No
Mineral oil except white mineral oil (paraffin oil)	10004	No	No	Yes	Mineral oil saturated hydrocarbons
C9-C12 Iso-alkanes	10052	No	No	No	C9-C12 Iso-alkanes

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Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed “products”.

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		<i>Yes: analysis to be carried out No: analysis not required</i>			
Non-ferrous metal blast furnace slag	10014	No	Yes	No	No
Used railway construction materials	10148	No	Yes	Yes	No
Radioactive substances	10005	No	No	No	Radioisotope loaded
Naphtha (petroleum), hydrotreated, light	10054	No	No	Yes	Cyclohexane
Lead, lead salts and any product having lead in its composition	10057	No	Yes	No	No
Lubricants and fuels derived from petroleum	10048	No	No	Yes	Mineral oil saturated hydrocarbons
Refusal of induction, without specific information	10128	No	Yes	Yes	No
Incineration flue gas purification residues: REFION (household waste) and REFIDIS (industrial waste) - in dry form	10142	No	Yes	No	Copper Zinc Dioxins and PCBs
Sand, polluted or from old industrial land	10066	Yes	Yes	No	No
Solvent naphtha (petroleum), light aromatic	10053	No	No	Yes	Cyclohexane
Solvent naphtha (petroleum), heavy aromatic	10055	No	No	Yes	Cyclohexane
Styrene	10049	No	No	No	Styrene
Anaerobic, new and unused granular seed biomass	20074	Yes	No	No	No
Sewage sludge (treated or untreated)	10017	Yes	Yes	Yes	Chloramphenicol
Pitch from coal tar or from other mineral tars	10130	No	No	Yes	Styrene
Pitch coke from coal tar or from other mineral tars	10131	No	No	Yes	No
Domestic waste and all by-products	10020	Yes	No	No	No
Di(2-ethyl hexyl) phthalate	10067	No	No	No	Di(2-ethyl hexyl) phthalate

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Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed “products”.

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		<i>Yes: analysis to be carried out No: analysis not required</i>			
Unpackaged seeds, treated with toxic materials	10016	Yes	No	No	Pesticides
Used cooking oil (cooking oil) that has not undergone a treatment and purification process	10134	Yes	No	No	Free fatty acids
Poppy straws, capsules and granules	30497	Yes	No	No	Alkaloids
Products based on Bisphenol A (BPA)	10051	Non	Non	Non	Molecule based on bisphenol A (cf IDTF - related products)

Official Position No 2-004
Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed “products”.

Annex II: Compliance criteria

Criterion	Parameter to look for	Source	Compliance	Sample size
Microbiological	Salmonella	Annex 13-1 of the public health code	Absent	5 L
	Enterococci		Absent	0.1 L
	E. coli		Absent	0.1 L
	Sulfite-reducing anaerobes		Absent	0.1 L
Heavy metals	Arsenic	Directive CE 2002/32	< 2 mg/L	0.1 L
	Cadmium		< 1 mg/L	0.1 L
	Fluorine		< 150 mg/L	0.2
	Lead		< 10 mg/L	0.1 L
	Mercury		< 0.1 mg/L	0.1 L
Non-heavy metals	Copper	Implementing Regulation CE 2018/1039	< 15 mg/L	0.1 L
	Zinc	Guide to Good Practices for the manufacture of mineral animal feeds	< 200 mg/kg	0.1 L
	Aluminium	INRS toxicology data sheet no.306	< 260 mg/kg	0.1 L
Polycyclic aromatic hydrocarbons	Benzo(a)pyrene	Industry threshold	Total for all parameters: 0.5 mg/L	0.5 L
	Benzo(a)anthracene			
	Benzo(a)fluoranthene			
	Chrysene			
Dioxins and PCBs	Dioxins (total PCDDs and PCFDs)	Directive CE 2002/32	< 0.75 ng/L	2 L
	Total dioxins and PCBs (total PCDDs, PCDFs and PCBs)		< 1.25 ng/L	
	PCBs other than dioxins (total PCB 28, PCB 52, PCB 101, PCB 138, PCB 153 and PCB 180)		< 10 ng/L	
Pesticides	Cypermethrin	Règlement CE 2017/626	< detection level	Follow analysis laboratory recommendations
	Deltamethrin	Règlement CE 2018/932		

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Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed “products”.

Criterion	Parameter to look for	Source	Compliance	Sample size
Pesticides	Piperonyl Butoxide	Règlement CE 1107/2009	< detection level	Follow analysis laboratory recommendations
Other contaminants	Asbestos	/	< detection level	Follow analysis laboratory recommendations
	1-Octadecenylsuccinic anhydride	/		
	Anthraquinone	/		
	Chloroalkane C14 - C17	/		
	Alkyl dimethyl hydroxyethyl chloride	/		
	Radioisotopes	/		
	Cyclohexane	/		
	Styrene	/		
	Chloramphenicol	/		
	Free fatty acids	/		
	Polycarbonates based on Bisphenol A (BPA)	/		

Note 1: Parameters cited in appendix I of this Official Position, for which there is no regulatory or industrial compliance limit, are **indicators of contamination**. In this event, the result for the last rinse water analysis for these parameters must be **lower than the analysis laboratory’s detection level**.

Official Position No 2-005
Acknowledgment of disinfection by fumigation

Theme 2	Cleaning of containers
Reference document	<u>Qualimat Transport Specifications §7.2.1</u>

Problem identified :

§ 7.2.1 of the Qualimat Transport specifications establishes cleaning level D as "Level B or C + disinfection with a disinfectant 'approved' for food contact". It is difficult to use water in the cleaning process for animal feed tanks due to their technical features.

- a) Is it acceptable under the Qualimat Transport specifications to use disinfectant smoke bombs and self-drying sprays for level D cleaning of feed tanks?
- b) Is disinfecting feed tanks with smoke bombs or self-drying sprays compatible with the definition of level D cleaning as described in the specifications?
- c) Can disinfectant smoke bombs and self-drying sprays be used for 'cleaning and disinfection', as defined in annex 3, step 3 of the specifications "Protocol for cleaning and disinfection of containers that have transported prohibited goods prior to redeployment for the transport of "products" for animal feed"?

Adopted Official Position :

- a) Feed tanks can be disinfected using smoke bombs or self-drying sprays specifically for the purposes of disinfection if:
 - The product is 'approved for food contact' in accordance with the OP2-002 definition 'choice of detergents/disinfectant';
 - The product is used in compliance with the recommendations on the technical data sheet. Particular attention must be paid to the following details: appropriate volume to be treated, reaction time, whether the container is watertight, compliance with the conditions of use;
 - The container is compatible with use of the product. Only tank-type containers have the technical features compatible with the use of smoke bombs and self-drying sprays for disinfection;
 - A Level D cleaning is recorded in accordance with section 7.2.2 of the Qualimat Transport specifications.
- b) No pre-washing with water is required when disinfecting feed tanks with smoke bombs or self-drying sprays. It is therefore compatible with the following definition:
 - Level D: level A + disinfection with a disinfectant 'approved' for food contact.
- c) Disinfectant smoke bombs and self-drying sprays cannot be used for 'cleaning and disinfection', as defined in annex 3, step 3 of the specifications "Protocol for cleaning and disinfection of containers that have transported prohibited goods prior to redeployment for the transport of 'products' for animal feed".

Note 1: Disinfectant smoke bombs and self-drying sprays must be used under conditions that ensure the safety of operators.

Date created : 01/02/2022
Effective date : 15/03/2022

Official Position No 3-001
Checking the history of containers for initial or preliminary audit

Theme 3	Audits
Reference document	<u>Qualimat Transport Regulations for Third-party Recognitions §4</u>
<u>Problem identified:</u>	
<p>Before an operator is registered, the auditor must check the history of their containers at an initial or preliminary audit. What period do these checks cover and what is the process for them?</p>	

<u>Adopted Official Position:</u>
<p>At an initial or preliminary audit, the auditor must check the history of the containers going back to before the operator was registered, to verify compliance with the operator's obligations (see the provisions under "operator's confirmation of registration")</p> <p>The checks may cover a maximum of the last 12 months of the operator's registration. The main purpose (in addition to any specific checks related to the preliminary audit) is to verify the nature of the goods transported and/or any redeployment protocols that have been carried out.</p>

Date created:	01/08/2012
Effective date:	01/08/2012

Official Position No 3-002
Subcontracting: evidence of compliance with the Qualimat Transport Specifications

Theme 3	Audits
Reference document	<u>Qualimat Transport Specifications §5</u>

Problem identified:

ISO 9001-certified transport operators have a document in their quality system describing the specific characteristics of each ordering party. This document, which is not verified by the client, includes a "subcontracting accepted" section.

Does this document release the operator from the duty of notifying the client about subcontracting?

Adopted Official Position:

The operator is not released from the obligation as the document is not validated by the client.

Date created :	12/02/2008
Effective date:	12/02/2008

**Official Position No 3-003
Classification of inconsistencies**

Theme 3	Audits
Reference document	Qualimat Transport Regulations for Third-party Recognitions §5.1

Problem identified:

Would it be possible to notify transport operators of the classification of any inconsistencies that may be detected during an audit?

Adopted Official Position:

A non-exhaustive list of inconsistencies that auditors may detect during a Qualimat Transport audit forms the subject of this official position - see the table below.

- Reminder of the classification of inconsistencies
- mi : Minor inconsistency
- MI : MAJOR inconsistency
- MC : CRITICAL inconsistency

Date created :	15/12/2015
Last updated :	01/02/2022
Effective date :	15/03/2022

**Official Position No 3-003
Classification of inconsistencies**

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
1. Company presentation, general information	Company ID (name, address, SIRET no., etc.)	Company declaration inaccurate	Minor
	Transport license or certificate of competence	License validity expired	Minor
	DGCCRF registration	Not registered with DGCCRF	Minor
	Presentation of activity Size Human resources Material resources Identification of nature of goods transported	Containers declared 'not applicable' used for transporting products - cleaning levels observed.	Minor
		Containers declared 'not applicable' used for transporting products - cleaning levels not observed.	Major
		Containers declared 'not applicable' transporting prohibited goods and not transporting products.	Minor
	Availability of Qualimat Transport reference documents	Available but out of date	Minor
		Not available	Minor
	Access to IDTF	No access to IDTF	Minor
		IDTF information out of date	Minor

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
§2.1. Quality system - management of documents and records	Document management procedure Documentation system Existence of written instructions	No procedure	Major
		Incomplete procedure	Minor
		Written instructions differ from specifications	Minor or Major (depending on which article of the specifications is concerned)
	HACCP	Minor discrepancies in terms of company activity	Minor
		Major discrepancies in terms of company activity	Major
	Traceability	Traceability missing for one container	Major
		Traceability incomplete for one or more operations requiring level A, B or C cleaning.	Minor
		Traceability incomplete for one or more operations requiring level D cleaning.	Major
	Procedure for storing traceability records	Retention period for level A, B or C cleaning records less than 18 months (12 months for newly-registered companies)	Minor
		Retention period for level D cleaning records less than 18 months (12 months for newly-registered companies)	Major
		Retention period for redeployment procedure records less than 24 months	Major
	§2.4. Quality system - management of non-conformities, customer complaints and	Non-conformities, customer complaints and corrective/preventative actions	Incomplete records of non-conformities/customer complaints and corrective/preventative actions (not including the minimum elements)

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
corrective/preventative actions		Records of non-conformities/customer complaints and corrective/preventative actions missing, no blank registration form	Major
§2.5. Quality System - improvement	Improvement	No corrective action following a non-conformity or customer complaint in respect of a minor non-conformity	Minor
		No corrective action following a non-conformity or customer complaint in respect of a major non-conformity	Major
		No verification of corrective/preventative actions	Minor
		Insufficient control measures to prevent recurrence of a minor inconsistency previously resolved in the 2 years and 2 months cycles after it occurred	Minor
		Insufficient control measures to prevent recurrence of a major / critical inconsistency previously resolved in the 2 years and 2 months cycles after it occurred	Critical
§4.1. Contract review - verification of contract feasibility	Identification and type of goods for transport Deployment of containers Scheduling of cleaning	Prohibited goods transported in containers used for transporting products (no redeployment protocol carried out where redeployment authorized)	Critical
		Goods incorrectly categorized for goods requiring level A, B or C cleaning	Minor

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
		Goods incorrectly categorized for goods requiring level D cleaning	Major
		Goods incorrectly categorized in the case of prohibited goods	Critical
	Requirement under Note 1: "Transport operators must establish and update a list of the main types of goods they transport [...]"	No list of the main types of goods transported (with indications as in §4.1.)	Minor
		List of goods does not include goods classified as prohibited or requiring level D cleaning	Minor
§4.2. Contract review - compliance with deadlines	Compliance with deadlines	No procedure identified for notifying the client in the event of late delivery	Minor
§5. Subcontracting	Certified subcontractor	Subcontractor chartered without Qualimat or equivalent certification	Critical
	Notifying the ordering party	No proof of prior authorization of subcontracting from the ordering party	Minor
		Retrospective authorization of subcontracting from the ordering party	Minor

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
§6.1. Human and material resources - human resources	Training of internal personnel in Qualimat Transport reference documents (including §7, 8, 9 and 10 of the Specifications)	Training carried out but incomplete (points not covered or category of personnel not trained)	Minor
		Proof of training missing	Minor
	Training of external staff (temporary, fractional staff, etc.) in Qualimat Transport reference documents (including §7, 8, 9 and 10 of the specifications)	Training carried out but incomplete (points not covered or category of personnel not trained)	Minor
		Proof of training missing	Minor
	Appraisal of personnel involved (internal and external)	Appraisal carried out but incomplete (points not covered or category of personnel not trained)	Minor
		Proof of appraisal missing	Minor
§6.2. Human and material resources - material resources	Inspection of containers on site	Containers not watertight (infrequent occurrence)	Minor
		Containers not watertight (frequent occurrence)	Major
	Rental agreement	Rental agreement does not specify that the lessee is prohibited from driving with transport documents in the name of the lessor	Minor
	Entry or return of a second-hand container to the vehicle park	History for the 12 months preceding entry to the vehicle park missing and/or seller's/lessor's word accepted (with no redeployment protocol carried out)	Major

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
	Definition of vehicle maintenance and upkeep procedures Taking waterproofing of tarpaulins, doors and hatches into account	Maintenance and upkeep procedures established and official but incomplete (e.g. waterproofing of tarpaulins, doors and hatches not taken into account)	Minor
		Maintenance and upkeep procedures established but not official	Minor
		Maintenance and upkeep procedures not established and not official	Minor
		Maintenance and upkeep procedures established and official but not observed	Major
	Recording of interventions	Records incomplete	Minor
		No records	Major
	Use of lubricants	Lubricants unsuitable for accidental food contact used in parts of the container likely to come into contact with product	Major
§7. Cleanliness of containers	Inspection of containers	Not clean after level A, B or C cleaning	Minor
		Not clean after level D cleaning or redeployment protocol	Major
	Cleaning and disinfectant product	Cleaning product not approved for food contact	Critical
		Unclear and ambiguous name not allowing identification of the product used	Minor
		Use of cleaning product past its use-by date	Minor
		Too much/too little product used	Minor

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
	Water compliance	No information on water quality for washing points and no corrective action taken (one occurrence)	Minor
		No information on water quality for washing points and no corrective action taken (repeated occurrence)	Major
		Water non-compliant for washing points and no corrective action taken (one occurrence)	Major
		Water non-compliant for washing points and no corrective action taken (repeated occurrence)	Critical
§7. Cleanliness of containers	Cleaning operations	Non-compliance with redeployment protocol (including OP3-004 'Minimum analyses to be carried out as part of a cleaning and disinfection procedure for the redeployment of containers for transporting 'products' for animal feed)	Critical
		Analyses carried out as part of a redeployment protocol not relevant for goods not classified in the IDTF	Major
		Non-compliance with level D cleaning (one or more occasion)	Major
		Non-compliance with level A, B or C cleaning (one occurrence)	Minor
		Non-compliance with level A, B or C cleaning (repeated occurrence)	Major
	Purging operations for successive loads of compound foodstuffs from different manufacturers	Purging not carried out (one occurrence)	Minor
		Purging not carried out (repeated occurrence)	Major

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
	Cleaning and purging records	Record incomplete (one occurrence)	Minor
		Record incomplete (repeated occurrence)	Major
		No record of cleaning (one occurrence)	Minor
		No record of cleaning (repeated occurrence)	Major
§9. Protection of products during transportation	Driver training on requirements for loading, observation, protection, and obligations at unloading	Failure to protect products with no corrective action taken (one occurrence)	Minor
		Failure to protect products with no corrective action taken (repeated occurrence)	Major
§10. Operator's obligations at loading	Declaration	Declaration incomplete	Minor
		No declaration	Major
§10. Operator's obligations at loading	Special considerations for compound feed	Failure to carry out ordering party's instructions (one occurrence)	Minor
		Failure to carry out ordering party's instructions (repeated occurrence)	Major

Official Position n°3-004
Provisions relating to businesses which use third party hauliers

Theme 3	Audits
Reference document	<u>Qualimat Transport Specification §10.1</u>

Problem identified:

§ 10.1 of the specification states that "the transport operator must be able to demonstrate to the consignee that the contents belong (by ownership or hire) to a transport operator that is listed by Qualimat Transport, in particular in the case of a haulier".

How can a transport operator which uses a third-party haulier prove the cleanliness of the contents?

Technical position adopted:

In order to prove upon receipt that the contents transported by a haulier belong to a transport operator that is certified by Qualimat Transport, a written certificate can be filled in by the owner of the contents and presented to the consignee by the third-party haulier.

In order to assess its reliability, the written certificate can be drafted in accordance with the following model:

Owner of the contents	Company	For the attention of:	Haulier
	SIRET no.	Company	
	Qualimat no.	SIRET no.	
	First name, SURNAME	First name, SURNAME	

Subject: Certificate relating to the haulage of contents belonging to a transport operator that is certified by Qualimat Transport

Madam/Sir,

I the undersigned Ms/Mr (*first name, SURNAME*) in my position as (*to be filled in*) certify that the transportation of registered contents (*to be filled in*) is covered by the company's Qualimat Transport certificate (*name of the certified business*) which is valid until (*expiry date of the current Qualimat Transport certificate*).

Please see enclosed: the copy registration document for the contents

I have noted the criminal penalties which the provider of a false certificate may incur*.

Date created : 17/10/2019
Effective date : 15/01/2020

Official Position No 4-001
Lubricants suitable for food contact

Theme 4	Equipement
Reference document	<u>Qualimat Transport Specifications §6.2.2</u>
<p><u>Problem identified:</u></p> <p>§6.2.2 of the Specifications indicates that lubricants used during maintenance operations must be suitable for accidental contact by anyone who comes into contact with or is in the vicinity of the “products”.</p> <p>a) Does this requirement apply to food-grade hydraulic oil in the circuits? b) How can you bring the entire vehicle park into compliance (cost of oil change)? Is any time delay allowed for old vehicles?</p>	

<p><u>Adopted Official Position:</u></p> <p>a) The expression “suitable for accidental contact” refers to an official classification of materials and substances in contact with food. Conformity with this must be checked on the technical data sheet for the lubricant.</p> <p>b) For lubricants inside circuits, the risk of contact with them in the event of a leak must be taken into account in the transport operator’s HACCP analysis.</p> <p>c) It is therefore not a requirement to use fluids suitable for food contact, in particular food-grade hydraulic oil, in all containers or to bring the entire vehicle park into conformity.</p>

Date created :	16/05/2018
Effective date :	01/07/2018

Official Position No 4-002
Traceability of used containers

Theme 4	Equipement
Reference document	<u>Qualimat Transport Specifications §6.2.2</u>

Problem identified:

Note 2 under §6.2 indicates: "If a transport operator introduces a used container (purchased, leased or returned by a lessee) into his/her fleet, the transport operator must obtain a written attestation, based on the transport history, guaranteeing that the container has never been used to transport IDTF-prohibited goods before it enters the fleet. In the event that no attestation can be obtained, the transport operator must carry out a redeployment protocol (see annex 3 of these specifications). For multiple exits and re-entries, these provisions must be repeated on each "re-entry" of the container to the transport operator's fleet."

- a) Does a written attestation constitute sufficient proof without the associated history?
- b) How do you assess the reliability of a written attestation?

Adopted Official Position:

- a) A written attestation does not constitute sufficient proof without the associated history. When a used container (purchased, leased or returned by a lessee) is introduced into a fleet, the transport operator must obtain a written attestation of what the container has transported before it enters the fleet, that it has never been used for prohibited goods as defined by the Qualimat Transport Specifications and the IDTF, and also the container's transportation history. These documents must cover the 12-month period before the vehicle entered the fleet. Auditors will assess the reliability of the documents relating to the container's history. If the documents retracing the container's history are not judged reliable, a redeployment protocol must be carried out on the container.
- b) To assess the reliability of the attestation, it must be drawn up according to the Qualimat template - see below.

Date created : 16/05/2018
Effective date: 01/09/2018

Company SIRET (Business registration):

First name and surname

Position

Address

Postal code Town

For the attention of

Company

SIRET (Business registration)

First name and surname

Address Postal code Town

Place, date

Subject: Sworn attestation

Dear sir or madam,

I the undersigned, Mr/Ms (*first name and surname*), director of the company (*name of company*) attest that my company has used the container with registration number (*registration number*) between (*date of purchase or start of lease*) and (*date of sale or end of lease*).

During this period/During the 12-month period until it was transferred, the contained was never used to transport prohibited goods as defined in the Qualimat Transport Specifications Version 6 and the International Database Transport for Feed (<http://www.icrt-idtf.com>).

Attached: history of the container for the 12 months prior to transfer.

I am aware of the criminal penalties for false attestations*. For all due intents and purposes.

(Place), (date)

Signature

*Fraudulent declarations are punishable under the penalties prescribed in article 441-1 of the penal code, with up to three years imprisonment and a fine of 45,000 euros.