

QUALIMAT TRANSPORT OFFICIAL POSITIONS



Table of contents

Number	Title	Date created	Last updated	Effective date	Page
Theme 1: Scope and limit of Qualimat Transport listings					
1-001	<u>Provisions relating to mutual recognition</u>	12/10/2010	/	12/10/2010	4
1-002	<u>Provisions for companies with several operating sites</u>	17/10/2019	01/02/2022	15/03/2022	5
Theme 2 : Cleaning of containers					
2-001	<u>Elements of level D cleaning</u>	18/12/2012	/	02/05/2014	6
2-002	<u>Choice of detergent / disinfectant</u>	18/12/2012	12/06/2023	12/06/2023	7
2-003	<u>Record purge hours</u>	16/05/2018	/	01/07/2018	8
2-004	<u>Minimum analyses required in the cleaning and disinfection protocol prior to redeployment of containers for transporting animal feed "products"</u>	01/02/2022	12/06/2023	12/06/2023	9
2-005	<u>Acknowledgment of disinfection by fumigation</u>	01/02/2022	/	15/03/2022	18
2-006	<u>Onsite cleaning operations in the dairy sector</u>	12/06/2023	/	12/06/2023	19
2-007	<u>Specific Characteristics of Products Derived from Animal By-products (ABPs), Including Processed Animal Proteins (PAPs)</u>	17/10/2023	/	17/10/2023	23
Theme 3 : Audits					
3-001	<u>Checking the history of containers for initial or preliminary audit</u>	01/08/2012	/	01/02/2012	27
3-002	<u>Subcontracting: evidence of compliance with the Qualimat Transport Specifications</u>	12/02/2008	/	12/02/2008	28
3-003	<u>Classification of inconsistencies</u>	15/12/2015	23/09/2024	23/11/2024	29
3-004	<u>Provisions relating to businesses which use third party hauliers</u>	17/10/2019	/	15/01/2020	39
3-005	<u>Reporting recurring inconsistencies</u>	12/06/2023	/	12/08/2023	40

Number	Title	Date created	Last updated	Effective date	Page
3-006	<u>Procedure for processing poorly completed preliminary questionnaires</u>	23/09/2024	/	23/11/2024	41
3-007	<u>Arrangements for advance renewal audits</u>	24/02/2025	/	24/02/2025	43
Theme 4 : Equipement					
4-001	<u>Lubricants suitable for food contact</u>	16/05/2018	/	01/07/2018	44
4-002	<u>Traceability of used containers</u>	16/05/2018	/	01/09/2018	45

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 Oqualim

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 Oqualim, 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>

Problem identified:

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”.

How does this requirement apply in the case of companies that operate as a cooperative?

- 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?

Adopted Official Position:

A cooperative operation involves total or partial sharing of the human, material and organizational resources owned by the transport operators as a common entity.

- 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.

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:

In §7.2 of the Qualimat Transport Specifications, what is meant by a detergent or disinfectant "approved" for food contact?

Adopted Official Position:

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 website biocid-anses.fr), 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.

Date created:	18/12/2012
Last updated:	12/06/2023
Effective date:	12/06/2023

Official Position No 2-003
Record purge hours

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

Problem identified:

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”.

- 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?
- What are the maximum acceptable limits for the analytical parameters used in checks?
- Are there any **special cases**?

Adopted Official Position:

- 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 Transport 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 Transport stipulation: **“FORBIDDEN, redeployment protocol not authorized”**.

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Last updated:	12/06/2023
Effective date:	12/06/2023

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
		Yes: analysis to be carried out No: analysis not required			
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

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		Yes: analysis to be carried out No : analysis not required			
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
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

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		Yes: analysis to be carried out No : analysis not required			
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
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 - petrocoke	10007	No	Yes	Yes	No

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		Yes: analysis to be carried out No : analysis not required			
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
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: REFIOM (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

IDTF 'prohibited' goods requiring a cleaning and disinfection protocol prior to redeployment	IDTF number	Microbiological contaminants	Heavy metals	Polycyclic aromatic hydrocarbons	Other contaminants
		Yes: analysis to be carried out No : analysis not required			
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
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 PCDFs)	Directive CE 2002/32	< 0.75 ng/L	2 L
	Total dioxins and PCBs (total PCDDs, PCDFs and PCBs)		< 1.25 ng/L	

Criterion	Parameter to look for	Source	Compliance	Sample size
	PCBs other than dioxins (total PCB 28, PCB 52, PCB 101, PCB 138, PCB 153 and PCB 180)		< 10 mg/L	
Pesticides	Cypermethrin	Règlement CE 2017/626	< detection level	Follow analysis laboratory recommendations
	Deltamethrin	Règlement CE 2018/932		
	Piperonyl Butoxide	Règlement CE 1107/2009		
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.

- Is it acceptable under the Qualimat Transport specifications to use disinfectant smoke bombs and self-drying sprays for level D cleaning of feed tanks?
- Is disinfecting feed tanks with smoke bombs or self-drying sprays compatible with the definition of level D cleaning as described in the specifications?
- 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:

- 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.
- 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.
- 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 2-006
Onsite cleaning operations in the dairy sector

Theme 2	Cleaning of containers
Reference document	Qualimat Transport Specifications §7.2

Problem identified:

a. **§7.2.1 defines level D cleaning** as “*level B or C plus a suitable disinfectant “approved” for food contact*”. The cleaning and disinfection operations carried out on company premises in the dairy sector do not meet this requirement of the specifications.

- i. Are the cleaning and disinfection operations carried out on company premises in the dairy sector acceptable as level D cleaning as described in the Qualimat Transport specifications?
- ii. How can products used for level D cleaning operations carried out on company premises in the dairy sector be verified as “*approved for food contact*”?
- iii. How should cleaning operations carried out on company premises in the dairy sector be recorded?

b. **§7.2.3 describes the evidence** for establishing water quality compliance as “*Mains water - self-declaration; water from any other supply - SCNA (Scientific Council for Animal Nutrition) microbiological criteria analysis at least once a year*”.

How can water quality compliance be demonstrated for cleaning operations carried out on company premises in the dairy sector?

Official position adopted:

Approval of the sanitation arrangements at companies in the dairy sector requires there to be an assessed quality management system in place.

a) Approval of the sanitation arrangements at companies in the dairy sector provides assurance that the automatic plant cleaning processes (CIP) carried out on the premises are authorised, enabling control of the microbiological risk.

- i) Yes, the confirmation statement completed by dairy sector companies confirms that cleaning operations carried out on the premises meet the requirements for level D cleaning (see the annex to this Official Position).
- ii) The “*approved for food contact*” requirement does not apply to cleaning operations carried out on dairy company premises due to the nature of them.
- iii) Cleaning operations carried out on company premises in the dairy sector must be recorded in accordance with section 7.2.2 of the Qualimat Transport specifications, except for the precise, unambiguous names of detergents and disinfectants used. The requirement to record the precise, unambiguous names of detergents and disinfectants used does not apply to cleaning operations carried out on dairy company premises due to the nature of them.

b) Approval of the sanitation arrangements at companies in the dairy sector provides assurances relating to water quality. The confirmation statement completed by dairy sector companies (see the annex to this Official Position) confirms that the water used for the internal cleaning of containers at dairy company premises meets the microbiological criteria for drinking water under annex 13-1 of the French Public Health Code.

Confirmation statement terms of use: in accordance with section 7.2.3 of the specifications, evidence of water quality compliance must be updated annually and endorsed by the signature of the dairy company representative.

Official Position 2-006
Onsite cleaning operations in the dairy sector

Note 1: the confirmation statement 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 use in animal feed".

Note 2: Use of the confirmation statement to respond to the requirements described in §7.2.1 and §7.2.3 of the specifications is reserved strictly to cleaning operations carried out by companies included in the list of EU approved establishments (Regulation no. 853/2004), section IX "Raw milk, colostrum, dairy products and colostrum products".

Date created: 12/06/2023
Effective date: 12/06/2023

Official Position 2-006 Onsite cleaning operations in the dairy sector

Qualimat Transport – cleaning in the dairy sector

1. Problem encountered

Manufacturers in the dairy sector supply raw materials for the animal feed sector. In this regard, transport companies certified by Qualimat Transport are required to load raw materials and carry out cleaning operations at factories in the dairy sector.

Some certified transport operators do not currently operate in accordance with all the requirements of the Qualimat Transport specifications:

- The **cleaning and disinfection procedures** by dairy sector manufacturers do not correspond to the protocol defined in the Qualimat Transport specifications. The protocol stipulates the **use of biocidal products approved** for food contact. These products are rarely used in dairy sector factories, which use other protocols for cleaning and disinfection purposes. Consequently, the cleaning and disinfecting operations carried out there are not recognised by the Qualimat Transport specifications, giving rise to major discrepancies when these companies are audited.
- The Qualimat Transport specifications require that guarantees must be obtained relating to the **quality of the water** used to clean the interior of containers. The reason is to ensure that the water meets the **microbiological standards** for human drinking water (annex 13-1 of the French Public Health Code) and does not contaminate the containers. Certified transport companies are unable to obtain documentary evidence that the cleaning water used at dairy company factories meets these water quality criteria, giving rise to major discrepancies when these companies are audited.

2. Proposal

Companies in the dairy sector are subject to strict food health and safety standards set by the Authorities or by their customers. Qualimat Transport must contribute to ensuring these standards are upheld during bulk transportation by road. However, Oqualim does not want certified transport companies to be penalised for their cleaning processes at dairy sector factories when there is evidence of good practice in terms of health safety. Oqualim's objective is to recognise the quality of the cleaning carried out at dairy sector companies. Nonetheless, to ensure the Qualimat Transport specifications remain fit for purpose, Oqualim must base this development on factual elements.

From the information we have been able to obtain, we are confident that the quality management system used by companies in the dairy sector adequately covers the quality of the water used and validates the cleaning operations carried out when foodstuffs are received, manufactured and shipped. However, Oqualim has not been able to obtain guarantees for the shipping of dairy sector by-products for use in animal feed. With this document, Oqualim requests written confirmation that your quality management system covers this eventuality; this will allow the certified transport companies concerned to be confirmed as compliant.

Official Position 2-006
Onsite cleaning operations in the dairy sector

Details of the dairy company supplying dairy by-products loaded into the tanks belonging to the company to which this document is addressed

COMPANY

No SIRET
(Business registration)

First name

SURNAME

Position

Details of the Qualimat-certified transport operator providing the tanks for transporting dairy by-products

COMPANY

No SIRET
(Business registration)

First name

SURNAME

Position

Subject: Confirmation of the scope of the quality management system

Dear Sir or Madam,

I, the undersigned (*First name, SURNAME*), (*position*) of the company (enter company name), site: (enter *location*), as a supplier of dairy by-products for use in animal feed which are loaded into your tanks, after cleaning them using our CIP systems at our industrial site, certify that:

- **The quality of the water** used for internal cleaning of the containers used to transport dairy by-products for use in animal feed meets the microbiological criteria for drinking water defined in annex 13-1 of the French Public Health Code.
- The **internal cleaning of containers** by automatic cleaning processes (CIP) used for containers that transport dairy by-products for use in animal feed, are established and maintained for the purpose of microbiological risk control.

For all due intents and purposes,

Place, date:

Signature

Official Position 2-007
Specific Characteristics of Products Derived from Animal By-products (ABPs),
Including Processed Animal Proteins (PAPs)

Theme 2	Cleaning of containers
Reference document	Qualimat Transport Specifications (Section 1: Background and General Information; Section 7: Cleaning Containers; Annex 1; Annex 3) and Third-party Recognition Regulations for Compliance with the Qualimat Transport Specifications (Annex 2).

Foreword:

Definitions set out in European regulations (article 3, Regulation (EC) 1069/2009 and Annex I of Regulation (EC) 142/2011)

Animal by-products (APs): "entire bodies or parts of animals, products of animal origin and other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen.

These animal by-products cannot be used directly in livestock feed."

Derived products: "products obtained from one or more treatments, transformations or stages in the processing of animal by-products (for example: dairy products, egg products, processed animal proteins, etc.)"

Processed animal proteins: "animal protein derived entirely from Category 3 materials, which have been treated in accordance with Section I, Chapter II of Annex X (including blood meal and fishmeal) so as to render them suitable for direct use as feed material or for any other use in feedingstuffs, including pet food, or for use in organic fertilisers or soil improvers; however, it does not include blood products, milk, milk-based products, milk-derived products, colostrum, colostrum products, centrifuge or separator sludge, gelatine, hydrolysed proteins and dicalcium phosphate, eggs and egg-products, including eggshells, tricalcium phosphate and collagen."

Regulation EC 999/2001 authorises, under certain conditions, the use of derived products in the formulation of compound feed for food-producing animals with the following restrictions (source: Trade union guide "Re-authorisation of non-ruminant PAPs in monogastric feed - July 2021)

"Prohibition on the use of PAPs in feedingstuffs for ruminants (except fishmeal for unweaned ruminants, in accordance with Regulation 999/2001).

Prohibition on the use of PAPs and ruminant blood products in livestock feed.

Prohibition on intra-species reuse. This principle applies to terrestrial animals."

Problem identified :

- a) Of the numbers on the IDTF listing that fall within the scope of Regulation EC 999/2001, some are authorised for transport alternately with 'products', while others are still 'PROHIBITED', why is that?
- b) The IDTF specifies the alternation and cleaning procedures for certain products derived from animal by-products in order to remain compliant with European regulations; what are the implications for Qualimat Transport?
- c) What impact do the changes resulting from redeployment of a container have? How do the changes affect the purchase of used containers?
- d) Note 1 under section 1.3 of the Specifications gives an example of goods PROHIBITED by the IDTF. Does this note still apply?
- e) In the Pre-registration Questionnaire (PRQ) you're asked to specify the number of containers 'involved' in the transport of regulated 'products'. What does this refer to ?

Official position adopted :

a) Of the numbers on the IDTF listing that fall within the scope of Regulation EC 999/2001, some are authorised for transport alternately with 'products', while others are still 'PROHIBITED', why is that?

- An amendment to Annex IV of Regulation EC 999/2001 made on 18 August 2021 authorised the use of: PAP from insects in pig and poultry feed,
- PAP from poultry in pig feed,
- PAP from pigs in poultry feed,
- Gelatine and collagen from ruminants in feed for non-ruminants.

The table below lists the products derived from animal by-products that fall within the scope of Regulation 999/2001 and are authorised for transport alternating with 'products' in the IDTF.

All other by-products remain prohibited for use and are still listed as 'PROHIBITED' in the IDTF.

IDTF no.	Product name	Compound feedingstuff components after which transport is authorised
10118	Dicalcium phosphate and tricalcium phosphate of animal origin intended for use in feedstuffs, or compound feed containing these products	Pork Poultry Other non-ruminants* Aquaculture
10119	Processed animal protein (PAP), derived from non-ruminants other than: aquaculture animals, farmed insects, porcine animals, poultry and compound feed containing these products	Aquaculture
10042	(Compound feed containing) Blood products derived from non-ruminants intended to be used for the feeding of non-ruminant farmed animals (including aquaculture animals)	Pork Poultry Other non-ruminants* Aquaculture
IDTF no.	Product name	Compound feedingstuff components after which transport is authorised

10046	Fishmeal and compound feeds containing fishmeal (except milk replacers for the feeding of unweaned ruminants)	Pork Poultry Other non-ruminants* Aquaculture	
10155	Milk replacers containing fishmeal for the feeding of unweaned ruminants	Pork Poultry Other non-ruminants* Aquaculture Unweaned ruminants	
10175	Processed animal protein (PAP) derived from porcine animals and compound feed containing these products	Poultry Aquaculture	
10176	Collagen and gelatine of ruminant origin and compound feed containing these products	Pork Poultry Other non-ruminants* Aquaculture	
10177	Processed animal protein (PAP) derived from poultry and compound feed containing these products	Pork Aquaculture	
10178	Processed animal protein (PAP) derived from farmed insects and compound feed containing these products	Pork Poultry Aquaculture	

*Other non-ruminants : rabbits, snails, horses, etc.

b) The IDTF specifies the alternation and cleaning procedures for certain products derived from animal by-products in order to remain compliant with European regulations; what are the implications for Qualimat Transport?

The European regulations govern the transport of products derived from animal by-products and compound feedingstuffs containing these products alternating with other goods.

There is also a specific regulatory framework relating to France. Article R226-1 of the French Rural Code stipulates that containers reserved solely for the transport of certain products derived from animal by-products must be used. In France, therefore, certain products derived from animal by-products cannot be transported alternately with each other or with any other goods.

On the other hand, there is no restriction in Rural Code article relating to compound feedingstuffs containing products derived from animal by-products. The European Regulations therefore apply in this case: containers for transporting these compound feedingstuffs must be used solely for the animal sectors for which these products derived from animal by-products are authorised (see the response to question a in the table).

NB Article R226-1, paragraph II of the Rural Code is now out of date and is currently in the process of revision.

c) What is the procedure for redeploying containers that have been used to transport products derived from animal by-products?

Regulation EC 999/2001 stipulates that containers having transported products derived from ABPs or compound feedingstuffs containing these products can be redeployed following a cleaning process authorised in advance by the competent authority.

However, no such redeployment procedure has been identified and authorised by the competent authority in France.

d) Note 1 under section 1.3 of the Specifications gives an example of goods PROHIBITED by the IDTF, does this note still apply?

Note 1: Caution! Inclusion in the 'catalogue of feed materials' alone (Regulation EU 68/2013) does not qualify any material as a 'product'. The Regulation includes other 'raw materials for animal feed' which

are not used or not likely to be used in feed for food-producing animals. For example, most of the 'raw materials for animal feed' that appear under section 9 of the catalogue (land animal products and derivatives) are PROHIBITED in the IDTF.

Yes, the note still applies, but as a result of amendments made to the Regulation and re-authorisation of the use of certain APA-derived products in feedingstuffs for food-production animals, it is more appropriate to say 'some' rather than 'most'.

e) In the Pre-registration Questionnaire (PRQ version 3.0; Annex 2 to the Third-party Recognition Regulations) you're asked to specify the number of containers 'involved' in the transport of regulated 'products'. What does this refer to ?

These are containers 'involved in' and used solely for the transport of certain APA-derived products, such as those governed by EC 999/2001 (see question a).

Date created :	24/10/2023
Effective date :	24/10/2023

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>

Problem identified:

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?

Adopted Official Position:

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")

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.

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	<u>Qualimat Transport Regulations for Third-party Recognitions §5.1</u>

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 :	23/09/2024
Effective date :	23/11/2024

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.) Transport license or certificate of competence DGCCRF registration	Company declaration inaccurate License validity expired Not registered with DGCCRF	Minor Minor 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
		Error in filling out a preliminary questionnaire resulting in an over-estimated or not affected audit time.	Minor
		Error in filling out a preliminary questionnaire resulting in an under-estimated audit time.	Major
	Availability of Qualimat Transport reference documents	Available but 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	Access to IDTF	Not available	Minor
		No access to IDTF	Minor
		IDTF information out of date	Minor
§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

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
		Retention period for redeployment procedure records less than 24 months	Major
§2.4. Quality system - management of non-conformities, customer complaints and corrective/preventative actions	Non-conformities, customer complaints and corrective/preventative actions	Incomplete records of non-conformities/customer complaints and corrective/preventative actions (not including the minimum elements)	Minor
		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

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
		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
		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 [...]"	Minor

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
		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 Transport 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
§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

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
	Appraisal of personnel involved (internal and external)	Appraisal carried out but incomplete (points not covered or category of personnel not trained) Proof of appraisal missing	Minor 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
	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) Maintenance and upkeep procedures established but not official	Minor Minor

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
§7. Cleanliness of containers		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
	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
		No information on water quality for washing points and no corrective action taken (one occurrence)	Minor
	Water compliance	No information on water quality for washing points and no corrective action taken (repeated occurrence)	Major

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
		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
	Cleaning and purging records	Record incomplete (one occurrence)	Minor

Item in Specifications	Point or requirement addressed	Inconsistency (non-exhaustive list)	Classification of inconsistency following amendment
		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 No 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:
	SIRET no.	Company
	Qualimat Transport no.	SIRET no.
	First name, SURNAME	First name, SURNAME
		Haulier

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 3-005
Reporting recurring inconsistencies

Theme 3	Audits
Reference document	<u>Qualimat Transport Regulations for third-party recognition, §1 Principles, General Information.</u>

Problem identified:

Section 1 of the regulations on third-party recognition states: "The term 'recurring' refers to minor, major or critical inconsistencies observed in the two (2) years and two (2) months preceding an audit and observed again at the audit".

- How should a recurring inconsistency be reported?
- How should a recurring inconsistency be rated?
- How should transport operators deal with recurring inconsistencies?

Official position adopted:

- Recurring inconsistencies should be reported as follows:
 - By reporting a non-compliance with the requirements of the Qualimat Transport specifications **and**,
 - By reporting a non-compliance with section 2.5 "*Improvement*" of the Qualimat Transport specification "*Control measure insufficient to prevent the recurrence of a minor/major/critical inconsistency removed in the 2 year and 2-month period prior to its reappearance*".
- Recurring inconsistencies should be rated in accordance with the classification given in Official Position 3-003 for inconsistencies relating to section 2.5 "*Improvement*" of the specifications.

Example 1: The auditor identifies an inconsistency relating to section 6.2 of the specifications, "*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)*" and a recurrence of the inconsistency. Two inconsistencies must be reported:

- MAJOR inconsistency "*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)*";
- CRITICAL inconsistency "*Insufficient control measures to prevent recurrence of a major or critical inconsistency resolved in the previous 2 years and 2 months*".

Example 2: The auditor identifies an inconsistency relating to section 7.2.2 of the specifications "*Non-compliance with level B cleaning (one occasion)*" and a recurrence of the inconsistency.

Two inconsistencies must be reported:

- Minor inconsistency: "*Non-compliance with level B cleaning (one occasion)*"
- Minor **or** MAJOR inconsistency: "*Non-compliance with level B cleaning (one occasion)*"; "*Insufficient control measures to prevent recurrence of a minor inconsistency resolved in the previous 2 years and 2 months before its reappearance*".

- The corrective action formulated as a response to the inconsistency relating to non-compliance with the Qualimat Transport specifications requirement provides a basis for the response to its recurrence. However, the transport operator must also refer to the response formulated for the original inconsistency in their response to its recurrence (for example: "see response indicated in inconsistency report no. X").

Date created : 12/06/2023
Effective date : 12/08/2023

Official position No 3-006
Procedure for processing poorly completed preliminary questionnaires

Theme 3	Audits
Reference documents	<u>Qualimat Transport Regulations for Third-party Recognition §3.2.2</u> <u>Contracts with certifying organizations</u>

Problem identified

Paragraph 3.2.2. of the Qualimat Transport Regulations on third-party recognition states that where a contract is in place with a certifying organization, the transport operator must supply the information necessary to formalize the organization's offer (preliminary questionnaire, see Annex 2 of the Regulations). The information must be up to date and submitted in advance for every audit, as a minimum requirement.

How should the certifying organization proceed if the preliminary questionnaire is incorrectly or only partially completed?

- i. Before the audit
- ii. During the audit
- iii. When making the decision on certification

Official position adopted:

- a) The preliminary questionnaire is incomplete or incorrect and **this is noted by the certifying organization at the time of drawing up the audit assignment contract**. In this case, the certifying organization should ask the transport operator to complete or correct the questionnaire to meet the requirements of the Regulations for Recognition.
 - The transport operator completes/corrects the preliminary questionnaire: the Regulations for Recognition are met; the transport operator is compliant with the requirements of the Qualimat Transport reference documents and the audit can go ahead according to the established procedures.
 - The transport operator does not complete/correct the preliminary questionnaire: the requirements of the Qualimat Transport reference documents are not met. Preparations for the audit are held up, the scope cannot be clearly established, and the expected duration cannot be calculated. **The audit has to be postponed until a properly completed preliminary questionnaire is received.**
- b) The preliminary questionnaire is incorrect, and the certifying organization does not have the necessary information to identify the error at the time of drawing up the audit assignment contract. **The error is noted at the audit.**

An **inconsistency must be recorded** for non-compliance with the requirements of paragraph 3.2.2 of the Regulations for Recognition. The certifying organization is required to evaluate the impact that the failure to make an accurate declaration has on the audit, i.e. its scope and organization.

The certifying organization will apply the following rules for inconsistencies based on their analysis:

	Example of case :
MAJOR inconsistency	Calculation of audit duration under-estimated (number of items incorrect, prohibited goods not declared, etc.)
Minor inconsistency	Audit duration over-estimated or not affected.

For a repeat offense, the **rules on recurrence apply**.

The certifying organization must determine whether a further audit is needed for it to complete the audit assignment or if an adjustment to the existing audit can be made and will suffice.

c) The certifying organization must determine whether a further audit is needed to complete the audit assignment or if the assignment carried out is sufficient to arrive at a decision on certification.

Date created: 23/09/2024

Effective date : 23/11/2024

Official Position No 3-007
Arrangements for advance renewal audits

Theme 3	Audits
Reference document	Qualimat Transport Regulations for third-party recognition § 3.3.1 Advance audits

Problem identified:

Paragraph 3.3.1 of the Regulations for third-party recognition indicates that “*Audits may be scheduled for up to two (2) months before the renewal date of the existing certificate without affecting the renewal date. Where an audit is carried out more than two (2) months before the renewal date, the term of the existing certificate will be shortened accordingly and the renewal date amended as a result.*”

It appears that this provision needs clarification for Qualimat-authorized Certifying Organisations to better understand how it is applied. The aim of this Official Position is to provide more detail on this requirement of the Recognition Regulations and illustrate the point with an example.

Official position adopted:

Paragraph 3.1.1 of the Recognition Regulations (“Registration”) specifies that the renewal date is the **expiry date of the three-month temporary certificate** issued to Transport Operators when they undertake their initial commitment (or re-commitment) to Qualimat Transport.

To clarify the arrangements for advance audits referred to in paragraph 3.3.1. of the Regulations, it is specified that:

- An advance audit is where the **audit is scheduled** for more than two months before the expiry date.
- Paragraph 7.3 of the Recognition Regulations indicates that “*The certificate issued relates only to future performance and cannot be issued retroactively*”. Where an audit is scheduled for more than two months in advance, therefore, the new renewal date is the **date the certifying organization makes its decision**, i.e. the **date on which the new certificate is signed**.

Example to illustrate how this requirement is applied:

- A transport operator registered with Qualimat Transport has a certificate valid from 03/08/2023 until 02/08/2024.
- A renewal audit may be scheduled for up to two months before the expiry date of the certificate, i.e. 02/06/2024, without affecting the renewal date.
- The renewal audit takes place on 17/05/2024. This audit is therefore held **more than two months before** 02/06/2024.
- The certifying organization makes its decision about the transport operator on 25/05/2024. A certificate is issued, valid from 25/05/2024 until 24/05/2025.
- The **new renewal date** is therefore 25/05/2024.

Date created:	24/02/2025
Effective date:	24/02/2025

**Official Position No 4-001
Lubricants suitable for food contact**

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

Problem identified:

§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".

- 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?

Adopted Official Position:

- 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.
- 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.
- 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.

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."

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

Adopted Official Position:

- 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.
- To assess the reliability of the attestation, it must be drawn up according to the Oqualim 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.