

WESTERN MILK POOL

**MILK TANKER SEALING  
& SECURITY MANUAL**

SEAL-TITE  
PROGRAM

February 2020

## Introduction

The food processing and retailing industry are increasingly demanding that their raw materials be of the highest quality and free from any contamination. In the past, the dairy industry's reputation and verbal assertions on their level of commitment were sufficient to maintain customer trust. However, today's buyers want and need more assurance. In addition, many processors have adapted Hazard Analysis Critical Control Point (HACCP) programs, or other similar programs, which require the sealing of all raw material trucks.

The goal of the Western Milk Pool (WMP) Seal-Tite Program is to begin a process of increasing awareness of potential security risks while milk is in transit and to introduce methods to reduce these risks. No milk transporter will be able to protect the cargo against all possible risks. Reducing risk, however, can be achieved by anticipating or recognizing risks in the day-to-day operation and intervene, where possible, to decrease the risk to an acceptable level.

This program has evolved since its inception and will continue to do so as improvements in the program are implemented or new potential risks are identified. This program outlines Best Management Practices (BMPs) that have been deemed essential to milk tanker sealing and security.

The four basic principles, with respect to the WMP Seal-Tite Program, that the driver and the Transport Company must always be cognizant of are:

- **Seals must be on the tanker whenever the truck is left unattended (out of sight) for any amount of time** (i.e. bathroom stop, lunch break, etc.). Sleeping in the bunker is considered as the truck being left unattended.
- The WMP has established the following standards with respect to tanker sealing. However, **the tanker can be sealed and re-sealed as often as necessary to ensure confidence in the security of the load**. All sealing and breaking of seals must be recorded in the daily seal log sheet.
- **All seals that are removed from the tanker or truck during a continuous workperiod must remain with that tanker or truck**. The removed seals will be disposed of by the driver or Transport Company at the end of the daily cycle for that tanker or truck.
- **The provincial milk marketing board** (BC Milk Marketing Board, Alberta Milk, SaskMilk, Dairy Farmers of Manitoba) **is to be contacted immediately if any indication of tampering is suspected**

## Liability & Responsibility

It is the responsibility of the transport company to ensure that all employees (drivers, etc.) always follow and adhere to the requirements of this (Western Milk Pool Tanker Sealing & Security) program. If program requirements are not followed, and milk cannot be guaranteed free of tampering, the transport company is liable for all associated hauling and disposal costs of the milk in question at the discretion of the provincial milk marketing boards.

## The WMP Seal-Tite Program is HACCP-Based

Development of this program used the basic principles of HACCP (Hazard Analysis Critical Control Point) which is a practical approach that identifies hazards (biological, physical, chemical) and determines critical control points where preventative measures or actions can be taken to eliminate or minimize risk(s). HACCP is a systematic, scientific, straightforward, and preventative approach to achieving and enhancing food safety standards.

By incorporating simple steps into daily activities, hazards can be reduced or eliminated. Through simple documentation (checklists, standard operating procedures, electronic records, etc.) key program elements cannot be altered or forgotten. As well, by tracking activities, corrective actions can be taken to remedy any problems, or evaluate the program, to ensure undesired situations are not repeated.

### **To maintain a HACCP-based program you must:**

- 1. Say what you do,**
- 2. Do what you say,**
- 3. Record it and,**
- 4. Evaluate the program as necessary**

The WMP Seal-Tite Program has identified three BMP areas: Tanker Security, Incident, and Communication. Within these three areas management practices have been developed to minimize the risk(s) of hazards and verify the key aspects of the WMP Seal-Tite Program. Using permanent records, standard operation procedures (SOPs), checklists, and emergency plans all those involved (i.e. drivers, receivers, wash personnel, dispatch, management, administration, etc.) will monitor and control BMPs.

## Security

### **General Security “Rules of Thumb”**

- All transporter employees should be made aware, by their transport manager/supervisor, of the potential signs of tampering with the product or equipment, the areas that may be vulnerable to tampering, and what an unusual situation is. All transporter employees should always report any suspicious findings immediately to their supervisor and to the provincial milk marketing board
- Conduct regular security checks for signs of tampering with product or equipment
- The transport company will assign responsibility for security to qualified individuals and provide an appropriate level of supervision to all employees with close attention paid to new employees. All employees will be trained to identify signs of tampering with product or equipment, unusual situations, and areas vulnerable to tampering
- The transport company will encourage and support all employees in reporting suspicious activity
- Always evaluate any request for information about your task/operation or the milk pickup procedure. Especially if the person inquiring is not a known person to you. Never provide information to any person without approval from the provincial milk marketing board
- A daily seal log sheet must be available for each trailer. This log sheet must and will be kept by the processor and the transporter for the balance of a six-month rolling period. After this time the log may be disposed of
- Please keep in mind that should a point in time come where a criminal report needs to be filed, the RCMP or other appropriate authority will ask for records of documentation (seal logs) and for reports of any suspicious activity prior to the event. Any observations that you make may contribute to the investigation and findings of those investigations. It is important to relate your concerns at any time to both the provincial milk marketing board and your supervisor
- Always contact the provincial milk marketing board and your supervisor when the discovery of a missing seal is made
- At the instance of a missing seal report, provincial milk marketing board staff will instruct the driver on any further actions to be taken

- In the instance of criminal or terrorist suspicion, provincial milk marketing board staff will make the first contact with the RCMP or other appropriate authority. The driver and transport company will make themselves available for any further steps that may need to be taken

## Tanker Security

To ensure the security of milk on tankers, seals must be used on all access points to the milk and/or milk contact surfaces within the truck tank including:

- Manholes/hatches
- CIP/wash line connection points
- The pump/valve compartments
- External hoses

The provincial milk marketing board will supply all milk transporters, on a continual basis, with seals. Each seal will have a unique identification number, which must be recorded, as outlined below, on the daily seal log sheet. Seals should not be shared with other transporters as the seals are allocated to transporters based on the seal identification number. For tracking purposes, each transport company will be given a group of seals within the same range of numbers (i.e. Transporter ABC will receive seals with numbers 00-100 and Transporter DEF will receive seals with numbers 101-201).

## En Route Tanker Security

*Definition – “constant sight” is the same as “control of”*

- It is the driver’s responsibility to ensure that seals are attached to the manhole covers, pump/valve compartments, CIP connection points, hatches, and external hoses when the vehicle is left unattended at any time and at the end of the day. A daily seal log sheet must be maintained at all times
- The driver, at the beginning of the day and prior to leaving for the collection route, must check to verify all seals are in place and show no evidence of tampering and, the numbers on the seals correspond to the numbers that were entered in the daily seal log sheet

- At the start of the day or new route if the driver is picking up milk, the driver breaks and removes the seal to the pump/valve compartments to install the sample case, and notes this with the corresponding seal number, in the appropriate place on the daily seal log sheet
- If the tanker has been in constant sight of the driver and he/she finds that a seal is missing, a new seal should be put on and recorded why. The driver must immediately notify the provincial milk marketing board and their supervisor of the incident and the corrective action(s) taken. Do not pick up or deliver any more milk until instructed to do so by the provincial milk marketing board
- Any time the tanker is not in the control of the driver (i.e. out of sight, gone for a meal, in the depot, sleeping, etc.) all access points on the tanker must be secured with a seal. When the Driver returns he/she will complete a walk around of the truck to assess if any tampering has occurred. As well, every seal must be visibly inspected before continuing. Upon return, if a seal is missing or any sign of tampering is evident, the driver must immediately notify the provincial milk marketing board and their supervisor. At this time the provincial milk marketing board may contact the RCMP or other appropriate authority and a criminal investigation may begin. Do not pick up or deliver any more milk until instructed to do so by the provincial milk marketing board
- All pump over/silo loads must be sealed at all access points before the load departs from the depot/location. Seals from the provincial milk marketing board are to be used only for loads directed by the provincial milk marketing board and not for by-product
- A milk truck transporting milk and milk products to a milk plant from another milk plant or transfer station must remain sealed at all times
- Once the tanker arrives at the receiving location, authorized receiving personnel will witness the removal of all seals on the truck and compare the numbers on all the seals to the numbers in the daily seal log sheet and sign the daily log sheet
- Both the driver and the receiver must maintain a copy of the tanker daily seal log sheet

Drivers should expect security spot checks by provincial milk marketing board staff at transporter depots or processor facilities.

Milk tank sealing is to be an integral part of new driver training. Provincial milk marketing board staff (or designate\*) will assess a new driver's comprehension of the WMP Seal-Tite Program at the time of his/her first ride-along. Comprehension of the program will also be assessed at any time a provincial milk marketing board staff member (or designate\*) rides along on any milk route.

\*Note the provincial milk marketing board may, at its discretion, assign responsibility for driver training to the transporter. Responsibilities will be layout out via contracts between the milk marketing board and the transporter.

Seals not in use must be stored in a secure environment at the depot, in the truck, or in the driver's possession.

#### **Decision to Seal or Not**

1. Tankers must always be in the control of the driver – if at any time it is not, then all access points must be sealed. All seals must be visibly checked upon the drivers return to the vehicle
2. Ensuring the tanker is resealed at the end of the day and overnight is the responsibility of the driver
3. All valve and hatch compartment do not have to be sealed between farms unless the driver is making a stop or is not in control of the driver (i.e. out of sight, in the depot, sleeping, etc.)
4. The truck must be sealed after the last producer is picked up and must enter the plant with all seals intact as recorded in the seal log sheet
5. The tanker is travelling directly to a wash station – seals may be absent after the tanker is unloaded it is travelling directly to the wash station and remains in control of the driver. The tanker must be sealed once washing is complete
6. Resealing after washing and/or unloading is the responsibility of the driver

## **Seals and Daily Seal Log Sheets**

The placement of seals on all access points/milk contact surfaces reduces the risk of deliberate contamination of the raw milk during the various steps of the collection and delivery process. The goal is to have all openings/milk contact surfaces on milk tankers sealed at all times, except when the tanker is being loaded, unloaded, sampled, washed or is in the control of the driver. The sealing procedure reduces the risk of any tampering occurring, however, it is the recording and the documentation produced as a result of sealing, that is the proof that a system is working. In a case where tampering or criminal intent is being questioned, it will be the driver's documentation that will make or break the case.

- A daily seal log sheet must be kept with the unit at all times. It will record the date, driver/receiver/washer who installed/removed the seal(s), tanker numbers, and seal numbers. Recording seal numbers will provide a chain of custody for each delivery of milk
- On multi-trip days the driver will need to start a new seal log for each load/route picked up in the day (the numbers and seals for the first load must be kept for the second load if the decision is made not to seal after unloading the first load)
- Seals will be placed at all access points to milk:
  - Manhole/hatches
  - pump/valve compartment
  - wash line connections (inlets/valves)
  - external hoses
- Seals are installed:
  - After washing
  - whenever the tanker is finished for the day
  - when a driver is not in control of the load or in visual contact (i.e. tanker is parked overnight, sleeper time, the driver goes for a meal, tanker in the repair shop, etc.). An exception will be made for trucks waiting for washing in a secured transporter owned yard
  - after any access (i.e. to sample load, when air vents freeze in cold weather, etc.)
- At the plant, the receiver will check the seal(s) before accepting milk and will match seals numbers with seal log sheets and if satisfied will sign the seal records
- Seals not in use must be stored in a secure environment at the truck depot, in the truck or in the driver's possession
- It is the responsibility of the driver to ensure all broken seals are carefully discarded in the proper place (i.e. waste bins, recycled, etc.) at the end of the route and delivery
- The transporter must keep daily seal log sheets for a period of six months

## Compromised Seals

If a seal is broken, missing, damaged, or does not correspond with the seal log the following applies:

- If a seal is broken in order to complete a repair, maintenance, or inspection task (i.e. changing pump or motor, entering tank for inspection, etc.), the access points must be resealed after the task is done. The new seal number and the date/time it was installed

must be recorded on the daily seal log sheet. The broken seal must be retained until the next load is delivered

- If a seal is broken, missing, damaged without any known cause, or does not correspond with the seal log, and the tanker has not been in constant control of the driver, the driver must contact the provincial milk marketing board and supervisor immediately. If the tanker is:
  - Empty – tanker must be re-washed (as instructed by the provincial milk marketing board or supervisor) before the next milk pick-up. An investigation will be conducted as required
  - Full or partially loaded – milk is not to be unloaded, and the tanker must be identified. Driver awaits further instructions for unloading/disposal from the provincial milk marketing board or supervisor
  - Contaminated, full or empty – the driver must wait for further instructions regarding any special disposal/washing requirements from the provincial milk marketing board or supervisor. Details surrounding the incident must be recorded in the corrective actions column of the seal log sheet or on a designated corrective actions sheet

The provincial milk marketing board will investigate, with the transport supervisor, to determine if there is a known or probable cause for a missing, broken, or cut seals. The explanation must be documented on the daily seal log sheet. If a logical explanation is forthcoming from the investigation or the tanker has been in constant control of the driver, the processor will perform his normal load screening tests and accept or reject the load based on these tests. If there is no explanation as to why the seal is missing, broken, or cut and the tanker has not been in constant control of the driver, the processor where the load is being delivered will have the option of accepting or rejecting the load. Milk receivers need permission from their supervisor to reject a load and the provincial milk marketing board must be immediately notified. If the load is rejected, it will be disposed of. No attempt will be made by anyone to market the milk elsewhere.

## Incident Response

Responding to a tampering, criminal, or terrorist event swiftly and concisely will minimize the damage to both the transportation company and the milk industry. To be prepared for a crisis, the following points need to be considered in advance:

- Have a strategy pre-planned for the event
- Conduct mock exercises every six months – the level of staff involvement may vary from a simple paper exercise to an actual on-the-ground exercise with full staff involvement. The process should include an evaluation of how well and how fast the problem was detected

- Identify in advance the critical decision-makers
- Identify in advance, washing instructions for the suspected or determined contaminates
- Identify management that employees should alert about potential security problems (i.e. identify the recall team leader for every shift)
- Identify a 24-hour contact information listing of all company contacts, related companies, processing plants, provincial milk marketing boards, and local authorities. Repeat process for every provinces/region that the milk is shipped
- If a phone threat is received, have the following list available to all phone personnel and have them record or write notes on what they hear during and after the call. Consider having a checklist made that phone personnel can have on hand:
  - Voice characteristics
  - Background noise
  - Name of the person who answered the phone
  - Time and duration of the call
  - What the caller said
  - The exact threat that was made
  - What demands were made
  - If the caller indicated that they would call again
  - How old the caller sounded
  - Gender of the caller
  - Any accents noted
  - Callers attitude(s) (calm, excited, intoxicated, rational, irrational, angry, etc.)
  - Note if the call sounded as though it came from a car, phone booth, or building
  - Immediately after the call, dial \*57 (or another similar service) to mark the call. Then call the police and tell them that you marked the call by dialling \*57 (or similar service). They, in turn, will be able to access from the telephone company the date and time the call was made and the phone number of the caller
  - Notify the provincial milk marketing board immediately

If a tanker that contains milk has been identified as suspect contaminated, based on missing or broken seal(s), the following steps must be taken:

- Immediately notify the provincial milk marketing board and your transport company supervisor so that an investigation can be completed as quickly as possible

- If a tanker has been unloaded at a plant contact the processor, provincial milk marketing board, and the plant or provincial marketing board will contact the CFIA
- If a suspect tanker is to be parked in a transporter depot or plant facility, identification of the suspect tanker must be clearly visible (i.e. markers, signs, etc.-these will be supplied by the provincial milk marketing board)
- Do not release any of the contaminated milk or milk samples until instructed by the provincial milk marketing board. Take an additional load sample, then label and store in sample box (sample container will be supplied by the provincial milk marketing board)
- Keep all daily seal log sheets, and any broken seals until instructed by the provincial milk marketing board. Always maintain a copy of the daily seal log sheet with you
- Do not attempt to identify any hazardous material by smell, taste, or touch. Reseal the tanker (if unsealed) and note the seal numbers
- Keep all unauthorized persons away from the tanker
- Transfer contents from the tanker only if instructed by the provincial milk marketing board
- Follow all instructions on where/how to wash the tanker and how to re-enter the tanker into regular use
- Do not dump the load until direction has been given by the provincial milk marketing board. Always confirm the location of the dumping site and the disposal procedure with the provincial milk marketing board as different scenarios may result in different locations or actions

## Communication for Contamination Incidents

Managers, supervisors, and drivers should network with others to share information to determine if there is a pattern of activities that, when taken alone are not significant, but when taken as a whole generate concern.

Communication within the depot and while drivers are in the truck should be maintained to ensure that all key personnel can be reached at all times.

Transporters should develop an information/feedback system for drivers to report discrepancies, inefficiencies, or improvement ideas. Drivers should report back to their supervisor and the provincial milk marketing board through hand-held devices or phone as soon as possible in the event of suspected contamination, broken, damaged, or missing seal.

## Program Evaluation

Evaluating the lessons learned from past tampering events, mock exercises and other related security issues can help improve existing programs. To effectively evaluate an operations program the following should be in place:

- Annual review of strategies by conducting mock criminal, terrorist or tampering events, and mock recalls. Challenge computer and physical security systems as well and revise accordingly
- Perform routine and random security inspections of facilities (i.e. receiving, dispatch, storage areas, etc.)
- Verify that security contractors are doing an adequate job
- Consider using a third party or in-house security expert