



Date: October 1, 2023

Re: Bulk and Liquid Transport Policy

United Sugar Producers and Refiners (United) is dedicated to providing the highest quality product to our customers, as demonstrated through close management of our manufacturing, distribution, and transportation processes. Our policies are designed to comply with all food safety regulations, including CFR 21 Part 1 Subpart O Sanitary Transport of Human and Animal Food, and are strictly enforced in order to eliminate any risk of contamination. Here is a summary of our food safety policies for transportation:

Motor Carriers – All carriers used for delivered shipments are under contract with USPR, and legally bound to comply with our policies as well as all federal, state, and local regulations governing transportation and food safety.

Equipment – Dry Bulk and Liquid trailers must be food-grade and can never have hauled hazardous material. All equipment must be maintained in good condition and free of temporary repairs and other conditions that may result in foreign material. Carriers are responsible for maintaining all equipment in a sanitary manner. Hoses must be handled in a sanitary manner at all times, including keeping hose ends off of the ground. Hoses must be inspected as part of the post-delivery inspection and must be cleaned or replaced if concerns are identified.

Pre-Load Inspection – Trailers must be inspected thoroughly prior to loading. Any trailer found not suitable for loading must be repaired and/or washed prior to loading.

Post-Delivery Inspection - Carriers are responsible for establishing a post Delivery inspection procedure. Mechanical or cleanliness issues identified must be resolved by the carrier prior to the trailer being reloaded.

Prior Commodities Authorized – Carriers must maintain a complete list of all commodities hauled in each trailer. All non-sugar prior commodity loads for dry bulk must have a conversion wash prior to hauling sugar. Only the following are authorized as prior commodities in trailers used to haul sugar:

Dry Bulk Trailers

- Granulated Sugar
- Flour
- Starch
- Dextrose
- Corn Meal & Dry Corn Products, including corn flour and corn starch
- Salt
- Rice
- Soybeans & Dry Soy Products
- Potato Products, including potato flour and potato starch

Liquid Trailers

- Clear, Non-flavored Beverage Alcohol
- Caramel Color
- Food Grade Citric Acid
- Corn Syrups
- High Fructose Corn Syrups
- Liquid Dextrose
- Liquid Invert
- Liquid Sucrose
- Manitol
- Sorbitol
- Potable Water



Bulk Trailers - Cane Refineries (Clewiston, FL and Savannah, GA)

Bulk Trailers loaded at Clewiston, Florida or Savannah, Georgia must be dedicated to cane sugar service. In addition, trailers washed at Savannah, GA must be dedicated to cane sugar service. This is to maintain the cane sugar identity of the product produced at the sites. Carriers must maintain records of all commodities hauled in each trailer, including differentiating between cane sugar and beet sugar. All non-cane sugar prior commodity loads for dry bulk at these sites must have a conversion wash prior to hauling cane sugar.

Dry Bulk Trailer Washing – Bulk trailers must be washed before being put into sugar service. Trailers must be washed if seal security or strict chain-of-custody is breached. Sugar trailers are typically washed every 90 days depending on usage; however, a wash cycle is not specified so trailers dedicated to sugar may be used for an extended period of time without introducing a risk of contamination as long as seal security is maintained and trailers remain fit for loading. Trailers are required to be inspected after washing, including that the trailer is clean and that all components of the trailer are dry.

Liquid Trailer Washing – Liquid trailers must be washed within 24 hours of loading. Trailers may handle multiple sucrose shipments to the same customer if loaded within 24 hours of the original wash, if seal security is maintained, if shipping to the same customer and the trailer remains fit for loading.

Wash Tickets – United facilities take sole responsibility for determining compliance with our wash policy and ensuring trailers are suitable for loading food product. Wash tickets are verified by United, and copies must be retained by the carrier. Carriers are expected to provide copies of wash tickets to the customer upon delivery.

Trailer Seals – Numbered seals must be used on all trailer access points and listed on the bill of lading or on a separate seal sheet to ensure chain-of-custody is maintained. Bulk trailers must always have all access points sealed, whether loaded or empty. All seal changes must be documented on the BOL. Drivers may remove and replace seals on an empty trailer. Drivers do not remove seals of loaded trailers in transit. If a driver must remove a seal from a loaded in transit trailer, he or she must obtain permission from USPR Transportation prior to doing so. This will allow for proper documentation of the event & ensure that new seals are recorded. Liquid trailers must always remain sealed while loaded and while under a valid 24-hour wash ticket. Hoses must be capped when not in use. Hoses must be individually sealed only if not contained within a sealed cabinet or hose tube.

Corporate Office:

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The motor carrier takes responsibility for the fitness of the truck blower and prevention of contamination risk. Truck Blowers must be sealed or locked when not in use, this is required. Truck blowers supply filtered air, the blower could be run prior to hooking to the trailer to ensure the air line is clean and dry. Blower seals may, or may not, be recorded on the bill of lading; and, since the loading truck will not always be the delivering truck, blower seal numbers are not required to match a seal number listed on the bill of lading or seal record.

Removal of seals of loaded trailers or railcars at delivery is the sole responsibility of the customer. Customers are responsible for verifying acceptance along with proper handling and disposal of the removed seals. All seals removed by the customer should be replaced by the customer. If a driver is instructed to remove seals at delivery by the customer, they are doing so with the customer approval; and the seals management remains the sole responsibility of the customer as it is the customer's policy and practice that is being followed while the seals are in their care, custody, and control. Drivers can apply seals if the customer does not to ensure security of the vessel. United shall not be liable to customer or carriers for any injury, damage, loss, or liability arising from the removal of the seals or any related insecurity of the vessel.

Standard Delivery – Standard equipment for dry bulk deliveries is a pneumatic tanker using 20 feet of 4-inch hose with a female cam-lock coupler. Air is supplied up to 12 PSI max. by a truck-mounted blower. Standard equipment for liquid deliveries is a rear-unload tanker using 20 feet of 3-inch hose with a female cam-lock coupler. Liquid tankers have self-contained pump units. Customers may choose to supply their own air or pumps for unloading trailers. Any special system/connection requirements must be communicated prior to delivery. Customers should instruct drivers on proper hook-up, and inspect connections prior to giving the authorization to begin unloading. Receiving procedures, any required lab analysis, and unloading of product must be completed within two hours or will incur additional charges for detention.

In-Line Screens Prohibited – USPR prohibits the use of in-line screens in bulk unloading lines because of contamination risk, sugar crystal degradation, longer unload times caused by the in-line restriction which may also result in blower overheating and high air supply temperatures and if broken add foreign matter into the product.

Use of Aerators Prohibited – USPR prohibits the routine use of aerators on dry bulk sugar deliveries. If carriers have circumstances where use of aerators cannot be avoided, the carrier must have a documented process for aerator use and all drivers must be trained on the use of aerators. Use of aerators increases the temperature, which can burn the product, making the product unusable for the customer.

Use of Screens – Top of Trailers – Carriers do not apply screens to the top of trailers. During delivery, carriers are permitted to prop covers open so that they rest on bolts, allowing the trailer to vent. If the customer requires a screen on the top of the trailer during delivery, they will need to apply and maintain this equipment. USPR will not be responsible for screens applied by customers.

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Special Delivery Instructions – Any customer requirements outside of those described here must be agreed to by United in advance and must also be clearly posted and communicated to drivers at the delivery location.

United and our carriers work diligently to ensure the quality and integrity of our product throughout our supply chain. Our policies provide peace of mind and eliminate additional work for our customers. Please contact your United representative if you have additional questions or concerns. Thank you for your confidence, and for your business!

Janet A. W. Harriman
Director of Quality and Safety
United Sugar Producers and Refiners

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