



PPI POSITION PAPER

The Sanitary Food Transportation Rule Does Not Apply to the Shipment of RACs to Food Processors

The Sanitary Transportation of Human and Animal Food final rule establishes criteria for ensuring that food is transported under conditions and controls necessary to prevent the food from being rendered adulterated. The rule sets broad requirements that apply to most transportation scenarios, however the transportation of raw agricultural commodities from farms to processing facilities by an entity considered a farm are not covered by the rule. In the preamble to the final rule FDA explains:

“Transportation activities for RACs, including fruit, to processing facilities are excluded from coverage under this rule, only if the activity is performed by a farm as defined in this rule. However, farms subject to the produce safety rule will be required to take steps to address the transportation of covered produce under that rule. Section 112.125 of the produce safety rule requires that equipment subject to that rule that is used to transport covered produce must be adequately clean before use in transporting covered produce and adequate for use in transporting covered produce.”

[81 FR 20092, 20126](#). FDA notes that non-farm carriers transporting raw agricultural commodities intended to be further processed are not covered by this exception, highlighting that the exemption is grounded in the status of the transporting entity. [81 FR 20092, 20126](#). It is PPI's position that when farms transport raw agricultural commodities to processing facilities they are not subject to the requirements of the Sanitary Food Transportation Rule.

