

“The approach moves the burden from the FDA being a food safety cop to companies being responsible for their own food safety systems,” says Jeff Barach, Ph.D., a food scientist and microbiologist who is advising PMMI on FSMA-related issues. “This is what the industry and regulators have been pushing for, but we’re not there yet. There is a lot of work yet to do to get FSMA finalized into regulations that both government and industry can work with.”

Indeed, the FDA’s proposed rule is essentially a starting point. During the required 120-day comment period that ends in early May, the agency will accept comments from the industry, consumers and others with an interest in the regulation. That input will then be used to shape the final rule, which would then be published in the Federal Register. Once the final rule is out, larger food processing companies will have a year from that date to comply with the new preventive controls, while smaller firms will have up to three years to implement their changes.

Barach says that as with recent pharmaceutical regulations, FSMA aims to hold food processors to a higher standard. But there are differences.

“Producers in both industries have to balance risk and reward, though the bar is higher for pharmaceutical companies,” he says. “Still, the aim is to do things that will make the process of producing food and packaging safer. There will be a learning curve as not everyone has a full appreciation of what goes into this process, and where the potential safety problems and risks may lie.”

ESTABLISHING THE EVIDENCE

The centerpiece of the proposed preventive control rule is the Food Safety plan, which will be required for all food handling facilities that are registered with the FDA under the current food facility regulations. The plan would include a fully documented hazard analysis with risk-based preventive controls, monitoring procedures and corrective actions.

Improved Sanitation through Retrofit



Original gate design required unbolting the gate plate to clean.



From underside of pan, UHMW gate slides onto mounting bracket.



Gate plate with mounting bracket removed.

A well known food producer was fed up with having to get out the tools and disassemble the gates every time its conveyors needed cleaning. The customer approached Triple/S Dynamics, Dallas, Texas, and provided the company with the challenge of reducing downtime by easing assembly and disassembly time.

Triple/S Dynamics supplied conceptual retrofit design drawings for customer review and used customer feedback to finalize the design over a four to six week period. Once the collaboration produced a satisfactory prototype, Triple/S fabricated and shipped the new gate parts in less than a month. The new gate parts were designed for minimal field rework to the existing conveyors and were installed in a day. The retrofit surpassed the customer’s expectations in that the gates were now toolless, easy to clean, lighter weight and interchangeable. They were so pleased they purchased several retrofit kits for field modifying their existing conveyors and purchased new conveyors with the redesigned gates.

Triple/S added the new gate design to its equipment line and now markets the retrofit to existing Slipstick conveyor owners.



New design with clamps to lower.



New gate design installed from the underside.

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Page S7

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Published by PMMI • PMTdirect.com

MARCH/APRIL 2013

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Plus: Cartoning (8); Servos/Motors/Drives (20) and FSMA - The Next Steps (42)