



***COMMENTS ON 3-A FROM
ILLINOIS***

**DON WILDING
ILLINOIS DEPT. OF HEALTH**

FYI: I AM NOT DON WILDING..



ILLINOIS INVOLVEMENT IN 3A

- **BEGAN TO PARTICIPATE IN 1990**
- **ADVANTAGES NOTED**
 - **DETAIL IN THE 3A DOCUMENTS FOR EQUIPMENT CONSTRUCTION,**
 - **THE ENFORCEMENT AND EXPLANATION OF THE 3A STANDARDS WAS EASIER THAN FOR THE ILLINOIS RULES FOR FOOD PROCESSING AND MANUFACTURING EQUIPMENT.**
 - **ILLINOIS “FOOD EQUIPMENT” RULES SIMPLY INDICATE THAT**
 - **FOOD EQUIPMENT BE DESIGNED AND CONSTRUCTED OF SUCH MATERIAL AND WORKMANSHIP AS TO BE ADEQUATELY CLEANABLE AND SUITABLE FOR THE INTENDED USE.**



ILLINOIS AND 3A

- **ADOPTED AS THE REQUIREMENT FOR CONSTRUCTION OF PROCESSING EQUIPMENT USED IN MANUFACTURED DAIRY PRODUCT PLANTS.**
- **BECAUSE OF THE JOINT PARTICIPATION OF MANUFACTURERS, USERS AND REGULATORY, ILLINOIS LOOKS AT 3A AS THE GOLD STANDARD FOR EQUIPMENT CONSTRUCTION**
 - **PARTICIPATION IN WRITING THESE STANDARDS WAS ENCOURAGED.**



COMMENTS ON PREVIOUS 3A STANDARDS WRITING PROCEDURES

○ OLD FORMAT

- **THE REGULATORY/SANITARIAN GROUP MET SEPARATELY AT THE ANNUAL MEETINGS TO EVALUATE PROPOSED 3A DOCUMENTS THAT HAD BEEN WRITTEN BY THE MANUFACTURER AND USER GROUPS IN THE ORGANIZATION. ON THE FINAL DAY OF THE ANNUAL MEETING, THE REGULATORY POSITIONS AND PROPOSED WORDING CHANGES WERE DISCUSSED AT A PLENARY SESSION WHICH INCLUDED ALL STAKEHOLDER GROUPS IN 3A.**

○ ADVANTAGES

- **EXCELLENT FOR TEACHING NEW SANITARIANS WHAT ISSUES WERE IMPORTANT IN A DOCUMENT AND PROVIDED GOOD COMMUNICATION AMONG SANITARIANS.**

○ DISADVANTAGES

- **DID NOT PROVIDE FOR GOOD COMMUNICATION BETWEEN THE SANITARIANS AND THE OTHER STAKEHOLDERS.**



HISTORIC CONCERNS – PAST 20 YEARS

- **IT HAS APPEARED TO THE SANITARIANS THAT MANUFACTURERS HAVE ATTEMPTED TO**
 - **MAKE CHANGES IN 3A DOCUMENTS THAT WERE INTENDED TO PERMIT THE USE OF INFERIOR DESIGNS AND MATERIALS EITHER FOR COST SAVINGS OR TO ALLOW AN EXISTING CONSTRUCTION THAT DID NOT MEET THE STANDARD TO BECOME COMPLIANT.**
- **THIS DID NOT FOSTER AN ATMOSPHERE OF TRUST AS THE NEW 3A DOCUMENT PROCEDURES WERE BEGINNING.**



COMMENTS ON NEW PROCEDURES

○ **NEGATIVES**

- **INITIAL CONCERN THAT 3A PROCEDURES MIGHT RESULT IN AN INCREASE IN DOCUMENTS WITH INFERIOR CONSTRUCTION REQUIREMENTS.**
 - **SOME OF THIS HAS OCCURRED**

○ **POSITIVES**

- **BETTER COMMUNICATION BETWEEN INDUSTRY & REGULATORY**
 - **MANUFACTURERS/USERS ARE ASKING FOR THE SANITARIAN VIEW AND FOR EXPLANATIONS OF THE SANITARIAN VIEWPOINT.**
 - **MORE TECHNICAL EXPLANATIONS OF THE MANUFACTURER VIEWPOINT WHICH AIDS THE SANITARIAN IN UNDERSTANDING.**



CONCERNS/COMMENTS FOR THE FUTURE

- **WIDESPREAD REDUCTION IN SUPPORT FOR 3A WORK BY THE STATES AND OTHER REGULATORY AGENCIES.**
- **THE RELATIONSHIP OF REGULATORY AND INDUSTRY IN THIS PROGRAM THAT MAKES 3A THE GOLD STANDARD.**
- **3A AS A GROUP MUST MAKE AN EFFORT TO GET STATE AND FEDERAL GOVERNMENTS MORE DEEPLY INVOLVED IN THE WRITING OF STANDARDS.**
- **AS I SEE REGULATORY PARTICIPATION DIMINISHING, I FEAR THAT THERE WILL SOON BE NO 3A GOLD STANDARD. THIS WILL BE A PROBLEM FOR ALL.**

