

# Expanding Knowledge of Hygienic Equipment Design

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# Focus

Perspectives on improving the education/training on hygienic equipment design for professional regulatory sanitarians and others.

- ▶ Who are the others -
  - ▶ Equipment Users
  - ▶ Manufacturers
  - ▶ Installers

# How is Knowledge of Hygienic Equipment Design Achieved?

- ▶ Interest in sanitary design
- ▶ Training
- ▶ Repetitive exposure
- ▶ Experience

# How is Knowledge of Hygienic Equipment Design Achieved?

- ▶ Wisconsin Department of Agriculture, Trade and Consumer Protection
  - ▶ Current Staff
- ▶ Interest in sanitary design
  - ▶ Included in Position Description
  - ▶ Necessary to perform job duties

# How is Knowledge of Hygienic Equipment Design Achieved?

- ▶ Wisconsin Department of Agriculture, Trade and Consumer Protection
  - ▶ Current Staff
- ▶ Training
  - ▶ Team approach to reviews
  - ▶ 3-A SSI
    - ▶ Classroom Training - 3A (It's Free 😊)
    - ▶ 3-A Annual Meeting
    - ▶ Knowledge Center [http://www.3-a.org/Resource/Knowledge\\_Center.php?DocID=1716](http://www.3-a.org/Resource/Knowledge_Center.php?DocID=1716)
  - ▶ Collaborative reviews?
    - ▶ Certified Conformance Evaluator (CCE)
    - ▶ USDA
    - ▶ Other States

# How is Knowledge of Hygienic Equipment Design Achieved?

- ▶ Wisconsin Department of Agriculture, Trade and Consumer Protection
  - ▶ Current Staff
- ▶ Repetitive exposure
  - ▶ Easily accomplished based on industry requests.
  - ▶ Patience during the process as we gain knowledge and experience.
  - ▶ Difficulty meeting industry needs during times of short staffing.

# How is Knowledge of Hygienic Equipment Design Achieved?

- ▶ Wisconsin Department of Agriculture, Trade and Consumer Protection
  - ▶ Current Staff
- ▶ Experience
  - ▶ In the last 1.5 years realized a loss of over 80 years of experience.
  - ▶ Currently engaging staff in training opportunities.
  - ▶ 1 Staff member with 15 years of experience. 😊
  - ▶ 3 Staff with less than 2 years of experience.
  - ▶ 2 Staff vacancies.



# Hygienic Design Resources

- ▶ 3-A Sanitary Standards, Inc.
- ▶ USDA - Agriculture Marketing Services
- ▶ Atlantic-Midwest Dairy Equipment Review Committee (AMDERC)
- ▶ Individual State reviews



# 3-A Review Process

- ▶ Third Party Verification Programs and Resources
  - ▶ Certified Conformance Evaluator (CCE)

[http://www.3-a.org/Symbol/3-A\\_Symbol.php?DocID=1728](http://www.3-a.org/Symbol/3-A_Symbol.php?DocID=1728)

- ▶ Process includes drawing review, material lists, material certificates and on-site reviews.

# USDA - Agriculture Marketing Services Review Process

- ▶ Voluntary, user-fee supported equipment review and certification program
- ▶ AMS specialists base equipment reviews on an examination of engineering drawings and of actual processing equipment
- ▶ <http://www.ams.usda.gov/AMSV1.0/EquipmentReview>

# AMDERC Review Process

- ▶ Submit Application for Review
  - ▶ Full detailed drawings
  - ▶ Material, Design and Construction information
- ▶ Evaluation of material by AMDERC members
  - ▶ May include field trials
- ▶ Final Review
  - ▶ Issuance of FDA M-b as appropriate
- ▶ Pacific/Southwest Regions Dairy Equipment Review Committee (PSRDERC)
  - ▶ Similar Process

# Wisconsin Department of Agriculture, Trade and Consumer Protection Review Process

- ▶ Contact locally assigned Food and Dairy Specialist
  - ▶ Application process under development
- ▶ Evaluation of drawings and material specifications
  - ▶ May include on-site review
- ▶ Final Review
  - ▶ Issuance of review letter as appropriate

# Wisconsin Regulatory Basis

- ▶ ATCP 80.12 Equipment and utensils.
  - ▶ (1) Construction and maintenance.
    - ▶ (a) Equipment and utensils, including C-I-P systems, shall be of sanitary design and construction. Equipment and utensils, including C-I-P systems installed after the effective date of this chapter, shall comply with applicable "3-A Sanitary Standards" and "3-A Accepted Practices" listed in APPENDIX A to this chapter.
    - ▶ (b) Equipment and utensils shall be readily accessible for cleaning and inspection, and shall be designed and constructed so that they can be easily cleaned. Equipment and utensils shall be kept clean and in good repair
- ▶ No Requirement for formal review
  - ▶ History of providing this service
  - ▶ Customer service component
  - ▶ Regulatory component

# Customer Service

- ▶ Industry Request
- ▶ Level Playing Field
  - ▶ Industry buy-in - All the partners
- ▶ Review not necessary for equipment holding a 3-A symbol, USDA Certification or AMDERC review (M-b issued).

# Regulatory Component

- ▶ Internal Staff Assistance
- ▶ Level Playing Field
- ▶ Compliance activity
- ▶ Regulatory personnel (we can't be)
  - ▶ 3-A certified conformance evaluators (CCE)
  - ▶ USDA AMS specialists
  - ▶ Regulatory "conflict of interest".

# Points to consider in the review process

- ▶ What happens after maintenance or repair?
- ▶ Industries role and responsibility to maintain equipment
- ▶ Regulatory oversight of equipment maintenance and cleanliness
- ▶ No “Silver bullet”



# Access to Standards

- ▶ 3-A Sanitary Standards and Accepted Practices
- ▶ 3-A® Sanitary Standards for General Requirements
  - ▶ ANSI/3-A 00-00-2014
- ▶ USDA GUIDELINES FOR THE SANITARY DESIGN AND FABRICATION OF DAIRY PROCESSING EQUIPMENT June 2001
- ▶ FDA Milk and Milk Product Equipment - A Guide for Evaluating Construction (August 2000)

# Changing focus on responsibility

- ▶ **FDA FD 512 Course**
  - ▶ Food Core III - Food Processing and Technology
  - ▶ West Lafayette, IN
- ▶ Onus is on the firm to “prove” that equipment is sanitary and cleanable following acceptable standard cleaning procedures.

# Changing focus on responsibility

- ▶ **Where Hygienic Design and Food Safety Law Collide**
  - ▶ Shawn K. Stevens, Food Industry Counsel, LLC
  - ▶ Proper equipment design is meant to preserve and protect the safety of food
  - ▶ Food Safety Modernization Act (FSMA)
  - ▶ How the new requirements impose new duties on processors

# Thank you

- ▶ Thank you for the opportunity to discuss the shared roles on expanding knowledge of hygienic equipment design.
- ▶ Questions?
- ▶ Contact Information
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