



NIBA—The Belting Association  
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# Technical Article

Technical Article Content Pulled from the NIBA Belt Line Newsletter

## Regulatory oversight of Conveyor Belt for Food Processing

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As consumers we share mutual concerns about the suitability of food products produced for public consumption. Likewise, as suppliers to different segments of the food processing industry, we should be aware of the current standards for safe, sanitary food processing and the respective agencies responsible for the maintenance and enforcement of these standards; this is the world in which many of our customers live.

The Pure Food and Drug act of 1906 precipitated the creation of the Food and Drug Administration. The FDA has oversight over all agencies and enforcement groups involved in the regulatory environment. These agencies include: United States Department of Agriculture (USDA) Meat & Poultry Division, USDA Dairy Division, and the USDA compliance division, Food Safety Inspection Services (FSIS). FSIS inspectors are the plant site representatives responsible for ensuring GMP (Good Manufacturing Practices) are implemented in the manufacturing sector through the adaptation of HACCP (Hazard Analysis and Critical Control Point) standards. HACCP is a problem solving logic conceived by NASA in 1977 and successfully adopted by the FDA.

In 1997, the USDA discontinued the practice of issuing prior approval letters for equipment and equipment components such as conveyor belting. USDA/FSIS stated that “to continue to grant prior approvals would perpetuate adherence to prescriptive design standards rather than setting food- safety performance standards.” The USDA then directed all meat and poultry processors to individually format and implement the seven principles of the Pathogen Reduction/HACCP system. The purpose of this change was to transfer the responsibility for maintaining sanitary conditions to the food processors and not rely solely on approval letters and FSIS inspectors to prevent contamination of the products being manufactured. “Under HACCP, establishments will assume responsibility for sanitation and for building science based, preventive process controls into the food production system to reduce or eliminate food safety hazards.” Executive Order 12866

HACCP standards have evolved into a comprehensive reference for all phases of plant Best Practice sanitation. Current standards attempt to identify the optimum conditions leading to GMP and cover in great detail application-specific functions such as the recommended pressures and temperatures for washdown solutions in meat plants, sanitizing agent mix ratios, O-ring groove tolerances, and literally thousands of other specifications.

In January 2003, the USDA Meat & Poultry Division, at the request of equipment manufacturers, agreed to establish threshold criteria for conveyor belting to be considered for a new generation of USDA approval certificates. The new criteria mandate that fabric carcass belts must have a top and bottom cover and capped or molded edges, eliminating the exposed fabric of cut edge or friction bottom belting. FSIS continues its oversight of the individual plant HACCP programs through its inspection and test procedures. It is important to note that



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“direct contact” fabric carcass belts in a meat processing plant are not required to have capped edges or a bottom cover; a belt’s suitability will ultimately be determined by the results of the inspection and testing. In other words, fabric carcass belts with exposed fabric may still be used in direct food contact applications, their suitability determined by the local FSIS inspector. However, only those belts with capped or molded edges; covered on both sides, and the prior approval letter, are assured acceptance.

The USDA Dairy Division has similar responsibility for all industries falling under its jurisdiction. USDA Dairy also issues conveyor belt prior approval certificates, however, before being considered for approval the belt must have received 3A Council approval. 3A is an independent council composed of four industry trade groups and the United States Public Health Service. While a belt must have 3A approval before USDA Dairy will consider it for a prior approval certificate, USDA approval is not automatically conferred. The 3A test criteria are very rigorous, involving among other things the immersion in hot oil of numerous belt samples for three-day periods with tight tolerances on the percentage weight gain/loss allowable per specimen.

The Federal Register is the “official daily publication for rules, proposed rules, and notices of federal agencies and organizations, as well as executive orders and other presidential documents. Contained in the Federal Register is the Code of Federal Regulations, CFR, which is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government.” In other words, every regulation and policy having to do with the IRS, Oil & Gas, the FDA regulations on food processing and all other government agencies is contained in the CFR. At over 60,000 pages, it is not a quick read. If you would like further detail on any of the agencies or programs mentioned in this article they may be found at the following sites:

***All current and pending CFR standards***

[www.archives.gov](http://www.archives.gov)

***HACCP standards for specific industries***

[www.cfsan.fda.gov/~lrd/haccp.html](http://www.cfsan.fda.gov/~lrd/haccp.html)