

## USDA, FDA, NSF REGULATIONS EFFECTING THE USE OF INSULATION PRODUCTS

The USDA (United States Department of Agriculture) regulates products used in food or meat processing plants. This includes breweries, meatpacking plants, dairies, fruit processing plants, vegetable processing plants, and juice packing plants. The USDA, prior to 1994, reviewed product formulas for compliance with their regulations. However, due to government cutbacks, this program is now a self-certification program. Nomaco products (elastomeric, polyolefin, and coatings-374) meet the guidelines of the USDA program. The program guidelines are defined as follows:

Nomaco products are approved for use in federally inspected meat and/or poultry establishments as long as it is unexposed. All exposed insulation materials must be covered with an approved jacket).

The topics of "Unexposed Insulation" and "USDA Approval" are explained in a letter written by Dr. Karen M Wesson, DVM. Dr. Wesson is the Director of Facilities for the, Equipment and Sanitation Division of the USDA. The letter is dated June 13, 1996.

Following are excerpts from Dr. Wesson's letter.

"The Food Safety and Inspection Service (FSIS), Facilities, Equipment and Sanitation Division (FESD) do not review or issue letters of approval for unexposed insulation materials. A letter of approval or acceptance is not required to be furnished to the FSIS inspector for the use of unexposed insulation materials in federally inspected meat and poultry establishments. However, they must meet the following requirements prior to their use in federally inspected meat or poultry establishments:

1. The unexposed insulation material must be installed and maintained in a sanitary manner acceptable to the FSIS inspector in charge.
2. The FSIS inspector in charge must be notified prior to installation of the unexposed insulation material as to the time and place the unexposed insulation material will be installed."

The FDA (Federal Drug Administration) recognition program is similar to that of the USDA only their restrictions are much more stringent. The FDA does not test and approve or reject particular rubber compounds. To meet the requirements of FDA, products must be manufactured from a list of ingredients established by the FDA. The list is published in 21CFR-177.2600 and is commonly referred to as the "white list." This list identifies raw materials that can be used and in what quantities. FDA recognition is only applicable in situations where the insulation actually comes in contact with the food item such as bottles, caps, seals etc. Insulation applications that would require FDA guidelines are very few. Our Insulation Products do not meet the requirements of FDA.

NSF (National Sanitation Foundation) is a non-government agency; similar to Underwriter Labs (UL) that certifies products for a wide range of applications (i.e. those associated with potable water, freezers, dishwashers, etc). The need for NSF recognition seldom arises. On those occasions when it does, the product formulation must be submitted to NSF and it is evaluated in conjunction with the completed unit for the specific application.