

#3

TOOLKIT

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As part of the marketing plan developed by NCCA's Board of Directors, the following article by Naomi Angel is the third in a series of resources designed to help you in your sales and marketing efforts. In subsequent issues of Coil Lines, similar proofs will be featured providing you with the educational resources you need. Tool Kit – Number 1, "Preventing Job Site Storage Corrosion of Prepainted Building Panels" by Fritz Friedersdorf was featured in Coil Lines issue Volume 9 Number 4. Tool Kit – Number 2 "The Executive's Guide to Material Safety Data Sheets" by Naomi Angel was featured in Coil Lines Volume 10 Number 2.

The Executive's Guide to USDA "Approved" v. "Approvable"

By Naomi Angel
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Purchasing managers and other OEMs often specify that paint and coatings have a U.S. Department of Agriculture (USDA) "approved" designation. But manufacturers and service centers cannot supply new colors (formulas) with "approved" designations because the government no longer uses that label. Instead, colors (formulas) developed after Aug. 12, 1994 can be referred to as USDA "approvable" – the replacement term that indicates that the paint or coating has satisfied rigorous self-certification requirements. The USDA designation signifies that the paint and coatings are considered acceptable for use in facilities with incidental food contact applications.

As is often the case, there's insufficient information about when and why the changes to terminology occurred and confusion follows. This Tool Kit #3 – the Executive's Guide to USDA "Approved" v. "Approvable" – intended to help you determine whether your paint or coating can be called "approved," "approvable," or just plain "accepted." A rose by any other name is still a rose!

A little background: Prior to August 1994, paint and coatings manufacturers and suppliers were required to apply to the USDA's Food Safety and Inspection Service (FSIS) to get acceptance for paint or coatings that were to be used in official establishments where there was possible incidental food contact. Such materials had to be tested and reviewed on a case-by-case basis by a specific department in the Product Assessment Division (PAD) of the USDA. If the formulas were approved, manufacturers and suppliers received acceptance letters from the FSIS indicating the materials complied with FSIS

requirements, were USDA "approved," and were fit to be used in government inspected meat or poultry facilities. The process was time-consuming and burdensome.

On Aug. 12, 1994, FSIS published a Directive, Approval of Paints and Coatings Used in Official Establishments, the purpose of which was to explain the USDA's revised procedures for obtaining authorization of paint and coatings intended for use in official facilities. During the first year following the issuance of the Directive, federal establishments continued to accept authorization or acceptance letters that had been issued under the prior approval program. The PAD completed testing and reviews for products already in the pipeline, but returned all new applications to their submitters with the description of all the new audit procedures.

Since 1995 all paint and coatings are self-certified by manufacturers or suppliers. They can choose to provide information to the Agency by submitting either 1) a letter of certification certifying that the paint and coatings comply with the appropriate USDA requirements and do not contain any hazardous ingredients, or 2) a complete and detailed listing of the chemical composition of all components with the requisite performance statement in the room finish schedule. In some cases, where a formulation is still used and has not changed since its original submission to the USDA under the old procedures, documentation can continue to state that the particular material is USDA "Approved." However, that designation merely signals that the formula was tested and reviewed prior to 1995.

The new procedures did not require the manufacturers and suppliers to identify any new information that had not already been available prior to 1994. Rather, the new program shifted the actual testing, review and acceptance process away from the USDA and onto the manufacturers and suppliers themselves. Through self-certification, the producers now indicate that their product formulas have no components that are potential hazards in an incidental food contact environment. Accordingly, the USDA “Approvable” designation assigned through the self-certification program should be no less or more acceptable than the former “Approved” listing. The terms merely indicate when the formulas were developed and accepted – either before or after 1994/1995.

If a customer asks for a paint or coating that is USDA Approved, it’s incumbent upon the manufacturer or supplier to explain that “approved” was replaced with “approvable” in 1994. When the USDA and FSIS revised their approval and certification procedures, both terms came to signify USDA acceptance. Remember the rose. . . . For further assistance or information, contact the U.S. Department of Agriculture at www.usda.gov.

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