A PROGRESS REPORT ON THE 3-A SANITARY STANDARDS PROGRAM, AND
THE ACTIVITIES OF THE 3-A SYMBOL ADMINISTRATIVE COUNCIL

C. A. AHELE

Chairman, Committee on Sanitary Procedure;
Secretary-Treasurer, 3-A Symbol Council
International Association of Milk and Food Sanitarians, Inc.

The activities and accomplishments of the Committee on Sanitary Procedure, during the Association year here being completed, will be summarized, as are the other Committee Reports, this afternoon.

At the Louisville meeting, it was reported that the 3-A Sanitary Standards Symbol Administrative Council had, through September 30, 1957, issued 75 authorizations to use the 3-A Symbol. Between October 1, 1957, and August 1, 1958, inclusive, 33 additional authorizations have been issued, making the total number issued (through that date) 108. Approximately 75 dairy equipment fabricating concerns, in this country and in Canada, now hold authorizations pertaining to use of the Symbol on one or more types of equipment for which Sanitary Standards have been published. The 3-A Symbol Council is completely solvent.

**AUTHORIZATIONS ISSUED THROUGH AUGUST 31, 1958**

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>Authorizations</th>
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<tbody>
<tr>
<td>Storage tanks</td>
<td>17</td>
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<tr>
<td>Pumps</td>
<td>8</td>
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<tr>
<td>Weigh cans</td>
<td>0</td>
</tr>
<tr>
<td>Homogenizers</td>
<td>5</td>
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<tr>
<td>Auto. transp. tanks</td>
<td>17</td>
</tr>
<tr>
<td>Electric motors</td>
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<td>Strainers (can type)</td>
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<tr>
<td>Piping fittings</td>
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<td>Thermometer fittings</td>
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<tr>
<td>Filters</td>
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<td>Tubular heat</td>
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</tr>
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<td>Farm tanks</td>
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<td>Leak-protector plug</td>
<td>3</td>
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<tr>
<td>Farm tanks</td>
<td>32</td>
</tr>
<tr>
<td>Bulk milk</td>
<td>5</td>
</tr>
<tr>
<td>Dispensers</td>
<td>2</td>
</tr>
<tr>
<td>TOTAL</td>
<td>108</td>
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That completes the statistical phase of this discussion. The remainder will be devoted to an effort to acquaint members of this Association with the basic objectives of the 3-A Sanitary Standards and 3-A Symbol Administrative Council programs, with some of the obstacles being encountered, and with the means being considered, or adopted to overcome these obstacles.

Although the number of 3-A Sanitary Standards in effect has grown progressively during the past fifteen years, so that the term “3-A Sanitary Standards” has become almost a by-word, it is also quite apparent to those who have explored the situation that sanitarians vary widely in their knowledge and understanding of the fundamentals of the 3-A Sanitary Standards and Symbol Administrative Council Programs. There still are some who assume a blank and non-committal expression when either subject is mentioned. Those at the other end of the range, who make frequent use of both programs, but who protest the time required to develop 3-A Sanitary Standards, or to amend or revise it, or who feel that the control of the use of the 3-A symbol should be more rigid, are probably unaware of the conditions under which these programs were launched and must continue to be conducted. The latter situation may be attributable—at least in part—to the failure to publicize effectively those aspects and features of these programs, an acquaintance with which is essential to true appraisals.

Fourteen consecutive Annual Reports of the Committee on Sanitary Procedure have been presented since the reorganization of the 3-A Sanitary Standards Committees in 1944; and the numbers of discussions of the 3-A Sanitary Standards program presented at State meetings of sanitarians, or published in the Journal and in trade publications, provide no basis whatsoever for an intimation of retiring modesty and self-effacement on the part of those actively engaged in that program. Furthermore, most of the Affiliate Associations have created Committees on Sanitary Standards. Incidentally, the achievements of the Committee on Dairy Industry Equipment, of the New York State Association of Milk Sanitarians, in the study of various features of 3-A Sanitary Standards and in making members aware that this is a major project of that Association, are outstanding. It must be conceded, however, that most of the publicity just enumerated has been devoted to WHAT has been and is being accomplished, and to the advantages and benefits accruing. Except for Harold Fielder’s paper on the Principles of 3-A Sanitary Standards—and others predicated upon it—now either forgotten or never read by younger members, there has been comparatively little elucidation of WHY 3-A Sanitary Stan-
ard are as they are, nor of HOW they take form. The same can be said about publicity on the 3-A Symbol Administrative Council program.

In these circumstances it is not surprising that some dissatisfaction with the 3-A Sanitary Standards program, and some skepticism about the Symbol Administrative Council program are to be noted and heard. However, having diagnosed, I believe, the fundamental cause of these attitudes, this opportunity has been requested to acquaint members of the Association with some of the conditions under which 3-A Sanitary Standards, amendments, and revisions are forged out, and under which the Symbol Administrative Council program must be conducted; in other words, the WHY and the HOW of these programs.

Formulation Of 3-A Sanitary Standards

Taking up first the manner in which the Committee on Sanitary Procedure participates in the formulation of 3-A Sanitary Standards:

Make-Up of the Committee on Sanitary Procedure

The geographical distribution of Committee memberships has ranged from California and Washington to Vermont and Connecticut, and from Wisconsin and Michigan to Texas, Mississippi and Florida. The membership consists of experienced sanitarians who are in constant contact with dairy equipment in the field, or whose approval must be obtained before equipment may be used in their regulatory jurisdictions. It would be difficult to effect a greater concentration of knowledge of the physical details and sanitation shortcomings of dairy equipment, in an equivalent number of individuals not engaged in the design or construction of the equipment. This reservoir of information, is invaluable when the Committee meets to review drafts of Tentative Sanitary Standards.

Predicated Upon Voluntary Collaboration

It is fundamental to a correct appraisal of 3-A Sanitary Standards always to bear in mind that they are formulated through collaboration—by the manufacturers of dairy equipment, by the users of the equipment, and by sanitarians—the Milk and Food Program of the USPHS, and the Committee on Sanitary Procedure of this Association. Since this project of formulating 3-A Sanitary Standards came into being sometime prior to the organization of the United Nations, the term "veto power" is never used during meetings of the 3-A Sanitary Standards Committees. Nevertheless, there exists a mutual understanding that no two of the participating groups, acting in concert, can adopt a provision of a sanitary standard to which the third group is not, after thorough discussion, agreeable.

Any member of the Committee, and a majority of the regulatory sanitarians in this audience could, no doubt, without assistance, draft sanitary standards for specific types of dairy equipment which would, in all respects, satisfy him or them. 3-A Sanitary Standards, however, are not—and cannot be—formulated by one individual, nor even by any one group.

Intelligent and judicial appraisal of any 3-A Sanitary Standard, or of the work of the Committee on Sanitary Standards, or of the work of the Committee on Sanitary Procedure, must be predicated upon the knowledge that the formulation of 3-A Sanitary Standards began as, and must be maintained as a voluntary and collaborative program. When the development of sanitary standards for a specific type of equipment is decided upon, the Chairman of the DISA Technical Committee is requested to appoint a Task Committee consisting of manufacturers or fabricators of the type of equipment affected. With the assistance and advice of the Secretary of the 3-A Sanitary Standards Committee, the Task Committee drafts tentative sanitary standards. This draft is reviewed by the Sanitary Standards Subcommittee of the Dairy Industry Committee, consisting of users of the equipment. It is not until this latter group is satisfied with the draft that it is submitted to the sanitarians for review. The sanitarians, whenever referred to in this discourse, consist of the representatives of the Milk and Food Program of the USPHS, and the Committee on Sanitary Procedure.

Mechanics of Review of Tentative Sanitary Standards

Copies of tentative sanitary standards are distributed to the sanitarians approximately six weeks prior to joint-meetings. Those who cannot attend joint-meetings mail their comments to the chief or chairman, respectively, of their groups. At joint-meetings the sanitarians of both groups work as a unit, reviewing the tentative sanitary standards paragraph-by-paragraph, strengthening provisions, clarifying vague or ambiguous text, and adding provisions deemed necessary. It is obvious that agreement on every provision of tentative sanitary standards must be reached by the caucus of sanitarians before the combined group is in position to press for the changes and insertions proposed in the subsequent general discussion with the committees of fabricators and users. What may be deemed essential in New England may not be wanted on the equipment in use in California; or vice versa. Discussion is sometimes rather extended, and sometimes a ballot is necessary to reach a decision. But agreement is reached, or a satisfactory compromise—not detrimental to essential sanitation—is effected.

The caucus of sanitarians is now prepared to discuss
details of the tentative draft, and additions, with the
Task Committee of manufacturers. Some of the changes
proposed are readily accepted. Others may involve
major modification of design and fabrication mechani-
cules on the part of several manufacturers. If a proposal
of the sanitarians affects all manufacturers, so that
costs of equipment units would be materially in-
creased, some other way to achieve the sanitation ob-
jective is sought, or the proposal is reappraised.

In any event, the discussions in the caucus are fre-
quently time-consuming (sessions have occupied parts
of two days and much of a night); conferences with
representatives of the Task Committee may be neces-
sary (sometimes sandwiched between caucus dis-
cussions on other tentative sanitary standards). All
of the manufacturers of the type of equipment in-
volved are rarely in attendance at the joint-meeting,
and the Task Committee may wish to consult the ab-
sent members before agreeing to all of the proposals
of the sanitarians. Consequently, those incomple-
ted tentative sanitary standards are placed on the agenda
for the next joint-meeting of the 3-A Sanitary Stan-
dards Committees, six months hence, when some of the
discussion may be repeated by Committee members
who did not attend the preceding joint-meeting.

These details of the deliberations of caucuses of
the sanitarians at joint-meetings of the 3-A Sanitary
Standards Committees are cited to account for the slow
rate at which 3-A Sanitary Standards are developed,
and to make it clear that EVERY detail of design and
fabrication prescribed (and, in most instances, others
not prescribed) has been discussed, pro and con, at
some length. Actually, the rate at which the forma-
tion of sanitary standards proceeds is governed by
the readiness with which the committees of users
and fabricators accede to the proposals of the sanita-
tarians, and the speed with which agreement or
satisfactory compromise is reached on provisions con-
cerning which there are differences of opinion. But
the point to bear in mind is that THERE CAN BE NO
3-A SANITARY STANDARDS UNTIL FULL
AGREEMENT IS REACHED AMONG THE
THREE INTERESTS CONCERNED. The more than
ten years required to formulate 3-A Sanitary Standards
for Milking Machines, and the complete failure—in
five or six years—to develop sanitary standards for can
washers, amply demonstrate the veracity of that
statement.

Incidentally, representatives of the U. S. Depart-
ment of Agriculture, of the Army and of the Navy who
are concerned with sanitary standards, attend the cau-
cus sessions of the sanitarians, as observers. The Com-
mittee extends to any member of the Association the
privilege of attending such a caucus session as an ob-
server, provided he observes the customary amenities
of such attendance; that is, acquaints the chairman
with his identity, and participates in the discussion
only when invited to do so.

Basic Objective of 3-A Sanitary Standards

The initial objective of the 3-A Sanitary Standards
program, initiated in the 1930's, was to establish prin-
ciples in equipment design, finish, and fabrication
which would satisfy the sanitation consciousness of
regulatory sanitarians, and which would serve to re-
duce or eliminate the tendency to draft sanitary
specifications of local application, and of consequent
non-uniformity with those applied elsewhere.

Basic Objective Being Abandoned by Some

With a few notable exceptions, the goal of that ob-
jective was being approached prior to the summer of
1953, when the 3-A Sanitary Standards for Farm
Holding and/or Cooling Tanks were published in the
Journal. During the past five years, local augmenta-
tions to the 3-A Sanitary Standards required of farm
tanks have included: ball or pear-shaped feet to the
legs, greater clearance above the floor, tightly-fitting
main covers, shortening of the outlet passage to the
valve seat, bayonet fittings on removable agitator
shaft connections above the drip-shield outside of the
milk-zone, and a higher rate of cooling.

It is conceded that the 3-A Sanitary Standards for
Farm Holding and/or Cooling Tanks were formulat-
ed before there had been developed the reservoir of
experience relative to farm tanks now existent.
Nevertheless, it is indeed questionable that the caucus
of sanitarians, even if it had then had available the
current experience, would have included in the 3-A
Sanitary Standards any of these local augmentations.
Sentiment in the caucus does not appear favorable
to their inclusion in the revision now under con-
sideration.

Obviously, then, instances of augmentation of 3-A
Sanitary Standards to satisfy local requirements con-
stitute negations of the initial and primary objective of
the 3-A Sanitary Standards program, to which this
Association, as its initiator, is deeply committed. There
is no escape from that conclusion, nor from the
semblance of retreat from a moral obligation, which
it implies.

3-A SYMBOL ADMINISTRATIVE COUNCIL PROGRAM

Now I wish briefly to discuss 3-A Symbol Ad-
ministrative Council policies and activities.

It is also essential to a clear understanding of these
policies and activities that it be recognized that the
organization of that Council is merely the result
of the extension of that co-operation and collaboration
to which reference has already been made. The Council has neither enforcement nor punitive powers. It can only grant or, if necessary, revoke authorizations.

The Council program of issuance and renewal of authorizations to affix the 3-A symbol to equipment which conforms to 3-A Sanitary Standards has been in operation for less than thirty months. The eight Council trustees—four of whom represent this Association—are all otherwise-employed individuals, none of whom receives any remuneration whatsoever for Council activities. In this and in other respects the Council program is not comparable to that of the Good Housekeeping Seal of Approval, nor to the ASME and Underwriters' Laboratory programs.

The authorization and renewal fees are nominal, and merely provide the Council with funds for normal operating expenses, and to cover the travel to meetings of trustees who would otherwise be able to attend only at personal expense. The financial balance being accumulated is being held in reserve to underwrite the cost of travel to hearings of charges against authorization holders, if and when held, or for other contingent expenses.

Authorization Issuance Prerequisites and Procedure

The conditions which must be satisfied by an applicant for a Symbol Administrative Council authorization to use the 3-A symbol were set forth in the paper entitled "Current Status of 3-A Symbol Utilization", presented at the 1957 Annual Meeting, in Louisville, and published in the April, 1958, issue of the Journal. Briefly repeated, these conditions are: (a) signature of printed declarations on the application form; (b) initialling of each paragraph and signature of the reprint of pertinent 3-A Sanitary Standards; (c) submission of a statement regarding the inspection system employed by the applicant; and (d) submission of descriptive literature, photographs, and such drawings as may be requested. The review of this material is conceded to be "paper work". The potentialities for oversight of details of design or construction prescribed by the 3-A Sanitary Standards—by either the applicant or the reviewer of the application—which are inherent in this procedure were recognized by those who sponsored the organization of the Symbol Administrative Council, and were accepted as calculated risks. They were stressed in the paper cited above and in other presentations, and the co-operation of members of the Association in reporting to the Council any observations of departure from 3-A Sanitary Standards was solicited.

The paucity of such reports received by the Council does not warrant agreement with the expressed opinion that the appearance of the 3-A symbol on equipment is relatively meaningless, unless a prototype of equipment has been inspected as a prerequisite to the issuance of an authorization, and unless each unit to which the symbol is affixed is also inspected by a representative of the Council. Surely, no one is so naive as to harbor the belief that the organized manufacturers of dairy equipment would ever have entertained the thought of participation in a 3-A symbol use and control had it been intimated that this would involve the employment of resident inspectors of the completed equipment, of full-time supervisory and administrative personnel, of the payment of office rent and the purchase of office equipment, etc. The cost of such an exercise of control of the symbol use would be upwards of $300,000 annually, presumably to be added to the unit prices of equipment. The proposal of a control program of such magnitude and cost must assure benefits not obtainable by the system now applied; i.e., the declarations of the applicant, supported by voluntary reporting of departures by sanitarians, users, and fabricators alike. If the extremely limited number of charges of non-compliance may be accepted as an index of substantial compliance during these nearly thirty months of use of the 3-A symbol, there would appear to be no justification for the serious proposal of so radical a step as the employment of a corps of full-time resident inspectors.

It is not implied, however, that the inspection of prototypes of equipment, as a prerequisite to the issuance of authorizations, is opposed as undesirable—even though it has not been demonstrated to be necessary. In a number of instances the Council has required the submission of small parts for examination as to design, finish, etc. And some of you have been called upon to view prototypes of equipment, and to express your opinions as to conformance.

It must be recognized, however, that conformance at the time of inspection prior to issuance of an authorization cannot provide a guarantee against the potentiality of fluctuations in the effectiveness of final inspection of equipment in the manufacturing plant. There is, therefore, the continuing need for sanitarians to assure themselves that the finish and workmanship of equipment justify the presence of the 3-A Symbol. Those features, such as radii, diameters of milk passages, width of bridge, etc., need not routinely be checked, since these are governed by the dimensions of dies and jigs, and do not change from unit to unit.

Check Lists

Check-lists of the provisions of the 3-A Sanitary Standards, covering equipment of several types, for
use in determining the degree of compliance, have been developed by one Affiliate Committee, and by several regulatory jurisdictions. The extent of their use by sanitarians, if a matter of record, has not come to the attention of the speaker.

The Symbol Administrative Council has been asked why it does not require the filling-out of check-lists and their submission with applications for authorization to use the 3-A symbol. The reason is that the Council requires the initialing of every paragraph of every section of the reprint of pertinent 3-A Sanitary Standards by the applicant—as well as its signature. A check-list is no more nor less than an inspection report form, the advantage of which is proportional to the condensation of the text of 3-A Sanitary Standards which can be effected. A consideration of the many provisions of long sanitary standards would be appropriate for use by individuals routinely or frequently inspecting units of equipment, and would materially reduce the cost and the inconvenience of the use of multiple-paged reprints. But, for single use by any individual, reprints adequately serve the purpose. The Council also ascribes a certain psychological value to the initialling and signing of a formal and official reprint of 3-A Sanitary Standards.

Publication of Lists of Authorization Holders

Beginning in the April, 1957, issue of the Journal, the names and addresses of concerns to which Symbol Administrative Council authorizations had been issued, and the models covered, were published by types of equipment until all authorizations in effect had been made known. Thereafter, the additional authorizations and changes in models covered have been reported each month to the Journal, and have been published as space was available. Because copy sent to the Journal on the last day of May or the first of June may arrive too late for publication in the June number, but appears in the July number, the list of authorization holders available in files of the Journal may not be depended upon to be fully current. This is unfortunate, but is a situation for which there is no remedy. The Dairy Industries Supply Association published a complete list as of September 30, 1957, and January 1, 1958, and will include in the Exposition Directory, to be distributed during the 1958 Dairy Industries Exposition, a list complete to the day on which copy goes to press. However, the authorization number held by a concern, and the models covered, can be ascertained by any sanitarian merely by addressing an inquiry to the Symbol Administrative Council. (That statement pertains only to sanitarians; therefore, inquiries should be identified by the position and connection of the inquirer.)

There is evidently some degree of misunderstanding concerning the timing of the publication of the names of holders of authorizations. Section (e) of Article IX of the By-Laws of the Symbol Administrative Council provides that:

"The first list of authorizations shall not be published until 12 months (or other selected period) after formal announcement of this authorization procedure."

The announcement of the readiness of the Council to receive applications for authorizations was made about April 1, 1956, and the first authorizations were issued on May 1 of that year. As previously stated, the first list of authorization holders was published in the April, 1957, number of the Journal, in accordance with the By-Laws. In Section (f) of Article IX it is also provided that:

"When a new 3-A Sanitary Standard is adopted, publication of names of manufacturers to whom authorizations are granted will be deferred for 12 months after publication of the sanitary standard—to allow ample time for all manufacturers desiring to do so to be included in the first list. The same procedure shall apply when revisions to existing sanitary standards are adopted."

Since 3-A Sanitary Standards published during the past several years usually carry a notation of the date of effect (one year after publication), it has been the policy of the Council to issue no authorizations pertaining to equipment covered by recently-adopted 3-A Sanitary Standards until they become effective. Thus, the names of the holders and the numbers of the authorizations pertaining to evaporators and vacuum pans, issued on August 1, 1958, twelve months following publication of the 3-A Sanitary Standard, were mailed to the Journal for the earliest possible publication. In this manner, no advantage has been given any manufacturer by virtue of the date of his authorization, and it is doubtful that any sanitarian has seriously been inconvenienced by the short, but unavoidable, lag in publication.

3-A Symbol Details

It has, in some quarters, been intimated to be highly desirable that:

1. 3-A symbols on equipment also include numerals indicating the year in which the authorization was issued,

2. 3-A symbols be positioned in restricted areas, specified for each type of equipment,

3. 3-A symbols conform to prescribed size and color, and

4. 3-A symbols for conventional and C.I.P. equipment (presumably, piping connections and fittings) be readily distinguishable.

These proposals are indicative of profound interest in the Symbol Administrative Council program. They have received consideration by the trustees of
the Council. When the whole range of equipment to which 3-A Sanitary Standards now apply is taken into consideration, however, it becomes apparent that these proposals either are impracticable, or are not sufficiently essential to warrant the added complication.

**Relationship Between Committee on Sanitary Procedure and Similar Committees of Affiliate Associations**

This discussion would be incomplete without some reference to the relationships between committees of Affiliate Associations, concerned with sanitary standards for dairy equipment, (whatever the title by which they are known), and the Committee on Sanitary Procedure of this Association.

The mechanical difficulties of providing such committees with copies of tentative sanitary standards, or of proposed amendments, in time to permit the holding of committee meetings, the drafting of comments, and transmission to the Committee on Sanitary Procedure prior to joint-meetings of the 3-A Sanitary Standards Committees have been emphasized in foregoing discussions. This inability to make use of experience in affiliate committees, in joint-meeting caucuses of sanitarians, does not imply, however, that such affiliate committees have no function. Assistance to the Symbol Administrative Council has already been suggested. The proposal of provisions to be included in sanitary standards known to be in course of formulation is another potential function. Others, such as the drafting of definitions of some of the general terms, such as "clean", "smooth", "easily", etc., which appear frequently in 3-A Sanitary Standards, have been undertaken as projects.

The Committee on Sanitary Procedure has never undertaken to assign specific functions or projects to Affiliate committees. Nor is it conceivable that it shall ever presume to dictate to any Affiliate committee what projects it should or may not undertake. But, whether or not there be Executive Board or Council of Affiliates by-law, rule, or precedent to that effect, it should be quite obvious that, whatever the project, whether it coincides with or is tangent to one of the Committee on Sanitary Procedure, the most direct and certain way to incorporate the findings of the project into the 3-A Sanitary Standards program (presumably the objective of any Affiliate committee) is to present them to, and to discuss them with the Committee on Sanitary Procedure, before they are independently published.

**Conclusion**

Having five Past-Presidents on the Committee on Sanitary Procedure, two Past-Presidents in the Milk and Food Program of the USPHS, and three representing it on the 3-A Symbol Administrative Council, the Association has a valid basis for assurance that its interests in these programs—as well as those of individual members—will not be neglected. There is no implication in that statement that non-officer members serving on these bodies are any less loyal to the interests of the Association.

The Committee and the Council welcome, and will act upon—within the frameworks of their respective organizations—constructive suggestions presented to and frankly discussed with them. No charge to the contrary can be maintained.

Members of the Committee on Sanitary Procedure and representatives of the Association on the Symbol Administrative Council will consider it a privilege to discuss details of the programs, or questions pertaining to specific provisions of tentative sanitary standards, at meetings of Affiliate Associations they are in position to attend. A broadening of the knowledge about and understanding of these programs is the only missing ingredient essential to their ultimate success.

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**INVITATION TO**

**THE**

**FORTY-SIXTH ANNUAL MEETING**

**OF**

**INTERNATIONAL ASSOCIATION OF MILK AND FOOD SANITARIANS**

**August 26 - 28, 1959**

**Glenwood Springs, Colorado**

**Headquarters — Hotel Colorado**

The Rocky Mountain Association of Milk and Food Sanitarians will host the 1959 meeting of the International Association of Milk and Food Sanitarians in Glenwood Springs, Colorado. Everything possible is being done to make your attendance at this meeting most pleasant and profitable. It is hoped that all who possibly can will make it a combination vacation and educational conference. Plan now to bring the