NSF-60

IMA-NA Request to the Joint Committee
November 28, 2018
The International Minerals Association of North America (IMA-NA) requests an update to NSF Standard 60, Section 3.9.2.

1. The IMA-NA group of industries manufacture safe products that consistently meet NSF-60 quality/testing specifications.
2. Valve bags are an industry standard for IMA-NA members.
3. Sealed truck-loads of product are shipped directly to end use customers and distributors.
4. The outer multi-layer stretch-wrap or shrink-wrap provides a layer of tamper evidence.
IMA-NA members believe that adequate protection from tampering exists, when the outer/larger container is sealed, without the sealing of each individual small container within the package.

IMA-NA requests that NSF remove from the standard: …”provided the smaller containers are not intended to be sold individually as certified product (i.e. not labeled for individual sale/use for drinking water applications)”.

It is the position of the IMA-NA that valve bags are suitable for packaging of products intended for use in water treatment applications and that the use of an outer multi-layer stretch-wrap or shrink-wrap provides a layer of tamper evidence. In addition, our industry members ship full truck-loads of product, which consist of fully wrapped pallets, in sealed trailers that are either shipped directly to end use customers or to distributors.
Distribution network

Distribution partners are members of NACD Responsible Distribution or ACC Responsible Care®.

- Members of these programs Distributors maintain secure facilities and secure shipments.
- Shipments consist primarily of full pallets to end use customers.
- In the circumstance that less than pallet quantities of product are sold by the distributor, the lesser quantity of bags are palletized and stretch-wrapped prior to shipment to the customer.
- Individual 50# bags are sold to end use customers from secure facilities.
Compliance with the Standard

The outer multi-layer stretch-wrap or shrink-wrap provides a layer of tamper evidence.

3.9.1 Definition of tamper-evident packaging
Packaging having one or more indicators or barriers to entry which, if breached or missing, can reasonably be expected to provide visible evidence that tampering has occurred.

Annex F- Examples of Tamper Evidence (DWA-60-2017-4)
Re: Tamper evident seals on pressurized cylinders.

“The group discussed the types of tamper evident measures used. These typically include seals and shrink wrapping over the valves. J. Palmer stated that as a chlorine manufacturer, his company uses a shrink-wrapped sleeve and has had great feedback.”
Additional Recommendations as developed by the Manufacturers Forum Tamper Evidence Task Group (November 27, 2018)

- The integrity of mineral products is maintained via stretch-wrapped pallets of product shipped in sealed vehicles to secure distributor warehouses and end use customers. Distributors maintain the integrity of opened pallets by operating secure warehouses according to Section 3.9. Traceability (Section 3.7) of products is maintained by each facilities records of purchase and sale. Distributors selling individual bags for NSF-60 applications may utilize tamper evident measures (e.g. applying TE tape or stretch-wrapping less than pallet quantities) prior to shipping to the end use customer in sealed trailers.

- NSF-60 standard section 3.9.3.2 Chain of custody as written is not practical for the minerals industry due to the wide distribution of these products. The alternative method 3.9.3.3 only applies to bulk material, but should be expanded to include packaged material. This would allow small distribution facilities that already operate to section 3.9 (maintain secure facilities) to apply tamper evidence on individual bags prior to shipping. This process can be strengthened by adding language to Section 3.7 (Traceability) that requires facilities operating under NSF-60 to maintain product traceability records.

- Note: these are recommendations that require additional feedback and input from other participants in the supply chain to ensure any proposed changes provide a practical solution to meeting the requirements of the standard.
Business impact

Consistent enforcement

Compete on a level playing field.

• Producers and distributors simply do not want to be placed at a competitive disadvantage due to the interpretation of individual auditors.

• If the product is allowed to be marketed with varying degrees of freedom, the distributors are going to choose the option that provides the most degrees of freedom for all their business – not just the NSF required business. 2-3% of the total domestic soda ash market that could shift toward producers with the most degrees of freedom.

• For producers to comply with tamper evident requirements for sale of individual bags, a major capital investment would be required.
3.9.1 Definition of tamper-evident packaging
Packaging having one or more indicators or barriers to entry which, if breached or missing, can reasonably be expected to provide visible evidence that tampering has occurred.

3.9.2 Security requirements for packaged products
Packaged product shall be stored, shipped, and delivered in tamper-evident packaging as defined in Section 3.9.1. Properly constructed, labeled, and sealed multi-wall containers such as bags and fiber drums or an outer multi-layer stretch-wrap or shrink-wrap, constitute forms of acceptable tamper-evident packaging. Smaller containers do not require individual tamper evident seals when shipped in a larger container from the manufacturer with acceptable seals or closures on the larger container as noted in the prior paragraph, provided the smaller containers are not intended to be sold individually as certified product (i.e., not labeled for individual sale/use for drinking water applications).
NSF 60 - Appendix F example (Left) and proposed addition (right)