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3-A SSI Interpretation Decision

Dated 2/26/2018

Re: 3-A Sanitary Standard for Machine Leveling Feet and Supports, Number 88-00

Per scope section A and definition C2 of 88-00:

Question 1: Does the scope of standard 88-00 include fixed legs that do not allow leveling or adjustment of the equipment?

Example: A piece of equipment has fixed legs made of solid round stock with no feet. Would the requirements for these legs be covered by standard 88-00 if standard 88- was a normative reference in the applicable equipment standard?

Question 2: Does the scope of standard 88-00 include feet welded or formed to legs that do not allow leveling or adjustment of the equipment?

Example: A piece of equipment has fixed legs made of solid round stock with welded flat plate feet that sit flat on the floor with no means for adjustment. Would the requirements for these feet be covered by standard 88-00 if standard 88- was a normative reference in the applicable equipment standard?

This is being requested to determine if additional criteria for leg supports are required within other equipment standards that reference 88-.

Interpretation Decision:

Following review of the interpretation request and in accordance with our *Procedures*, Section 2.13 allows “the Secretariat to directly respond to a request for interpretation only if the question posed can be answered by making a direct citation to the 3-A Sanitary Standard or 3-A Accepted Practice. The Chair of the 3-A Steering Committee must concur in the response of the Secretariat.”

Both the Secretariat and Steering Committee Chair were able to make a direct citation to the answers to your questions.

First, here is the title of Standard 88-00: “3-A Sanitary Standard for Machine Leveling Feet and Supports”

The title is machine leveling feet AND supports.

Second, here is the scope of Standard 88-00:

A SCOPE

A1 This 3-A Sanitary Standard covers the sanitary aspects of machine leveling feet and supports used on equipment in a wet processing area of dairy, food and other comestible products plants, including dry processing areas cleaned with water. These feet or supports attach to the equipment and support the equipment from the floor. The feet or supports begin at the point where the feet or supports attach to the leg(s) or the body of the equipment and end at the support point on the floor. This standard does not include supports that attach to a wall or ceiling.

These feet and supports are not product contact surfaces but have a hygienic significance because they may become a harborage of soil and create a source of secondary contamination to the products.

This standard does not cover Casters.

This standard does not cover mounting to a Slab or Island.

A2 In order to conform to this 3-A Sanitary Standard, machine leveling feet or supports shall conform to the following criteria for design, material of construction, fabrication techniques and installation, as appropriate, and the current revisions or editions of all referenced documents cited herein.

The scope covers the sanitary aspects of both machine leveling feet AND supports. “The feet OR supports begin at the point where the feet OR supports attached to the legs(s) or the body of the equipment and end at the support point on the floor. This standard does not include supports that attach to a wall or ceiling.

Therefore, as per your first question:

Question 1: Does the scope of standard 88-00 include fixed legs that do not allow leveling or adjustment of the equipment? Yes. Per the scope of 88-00 legs are included and referred to as “supports.”

Example: A piece of equipment has fixed legs made of solid round stock with no feet. Would the requirements for these legs be covered by standard 88-00 if standard 88- was a normative reference in the applicable equipment standard?

Yes. Standard 88-00 covers fixed legs of equipment.

Date Received by 3-A SSI: 2/1/2018	IG Chair: Lyle Clem
Date Received by 3-A SSI IG:	
Date of 3-A SSI IG Decision:	Date: 2/26/2018