

Overview

Food safety regulations are imposed primarily on the food manufacturers, not on their packaging suppliers. For packaging companies, it's less about regulation and more about compliance, which is voluntary. That means one more thing – one more *big* thing-- for food manufacturers to worry about. Especially these days, when packaging is more and more treated as an ingredient, as recalls occur and as regulatory and monitoring entities worldwide step up vigilance to ensure consumer safety.

How can a food manufacturer know that a paperboard packaging converter will protect, not jeopardize, the safety of its supply chain? It comes down to every detail, from protocols for an employee who introduces a new cleaning product in the bathroom, to online equipment that detects parts per million of banned substances in paper received from the mill.

Here are questions to ask yourself, as well as your current or prospective packaging converter.

Is your packager AIB and HACCP certified? How does it rank? AIB-certified converters, like Bell, are ranked for product safety, pest control, operational methods, personnel practices, maintenance and cleaning practices. Every year, Bell has received the highest AIB rating of “superior,” and also has HACCP certification, which goes even further by evaluating the biological, chemical, and physical hazards associated with raw materials and processes.

What food companies does the packager already serve? Bell serves the companies that set the bar, and they set it high: one of the world's largest fast-food chains, for example, and the super-critical dairy industry. We meet and beat their standards, and will for any company we serve.

Can the packager accommodate your needs for separate equipment: food- vs. non-food-grade products? Wet food vs. dry? Bell serves both food and non-food customers, makes packaging for both wet and dry foods, and invests in the latest equipment, including specialty equipment to meet individual customer requirements.

Can the converter show you letters of guarantee from all of its suppliers? Some of Bell's food-industry customers require that we have letters from suppliers, whose materials will be used in manufacturing food packaging, stating that their materials are safe according to the Food, Drug and Cosmetic Act. We get these letters whether or not our customers require it.

What about allergen control? Fifty percent of food recalls are due to mislabeling or contamination. From receiving to distribution, employee lunches and vending-machine foods to bathroom cleaning products, there are known allergens throughout every plant, every production process. At Bell every employee is not just trained, but educated, about food safety. Cross-functional teams, detailed documentation protocols and monitoring systems are in place.

What about mixing protocols? It can happen. A worker grabs cartons from a nearby pallet and mixes them in with cartons for food that contains nuts, or soy, or other allergens. Bell's plant

protocols preclude that from happening, and our Leary Detection System--which detects glue alignment, label presence and placement, bar codes and film--guarantees it.

If the mill sends paper with too much metal will the converter catch it? It can happen, since mills test random samples. Bell customer's standards vary – size of metal piece allowed, ferrous or non-ferrous, etc. Bell addresses this with a metal detection system that greatly minimizes the risk of product contamination.

Who is responsible for ensuring that food-safety regulations resources and procedures are in place? It ought to be top management, as it is at Bell. Bell's leadership team made it a full-time job for a senior level employee, who is dedicated to keeping abreast of all safety developments, ensuring the right infrastructure, equipment, and procedures that make safety and compliance a fundamental part of the culture. Senior leadership heads up HACCP and AIB compliance, creates procedures and ensures they are translated to daily practice, oversees preventive maintenance and supplier screening, customer complaint processing, traceability, pest management and recall programs.

Ask to see the converter's written food safety prerequisite programs. Safety policies and procedures should be written, shared and used across the plant – not stuck on a shelf. Visit the facilities and note how and where GMPs (good manufacturing practices) are posted, shared and accessed. You should be able to ask any employee, from custodian to press operator, about his or her safety responsibilities. At Bell, each machine center has personal computers where these documents are easily accessed by all employees. Prerequisites are posted around the plant and in the break areas. Written procedures for food safety training and education are routinely referenced and adhered to. A visible part of the culture – that's what you should find.

Standards, certifications and provisions:

Bell adheres to, is certified by, monitors and follows:

- **AIB certification** ("superior" ratings every year)
- **HACCP certification**, including list of threshold exemptions for chemical control, allergen control, physical or biological control.
- **Code of Federal Regulations, Title 21 Food and Drug**
 - **Part 110** – Current Good Manufacturing Practice in Manufacturing, Packing, or holding Human Food
 - **GRAS notices** - Chapter I Food and Drug Admin. Dept. of Health and Human Services; Subchapter B – Food for Human Consumption; Part 176 – Indirect Food Additives; Paper and Paperboard Components.
- **Prior sanction letters** guarantee our packaging is safe and does not pollute the environment. We prepare letters to demonstrate that we meet customized client requirements, state-specific acts, and industry standards.

Information: **Contact Bell Incorporated, 800-658-3396, or visit www.bell-inc.com**