



REQUEST FOR INTERPRETATION OF 3-A SANITARY STANDARDS OR 3-A ACCEPTED PRACTICES CRITERIA

Craig Latham CEO/President Bepex International LLC 333 Taft Street NE, Minneapolis, MN 55413 clatham@bepex.com	3-A Sanitary Standard for Enclosed Cheese Vats and Tables, Number 83-01.
Requester Telephone No.: 612-627-1423	Scope: A SCOPE: A1 This 3-A Sanitary Standard applies to the sanitary aspects of enclosed cheese vats and tables used in the batch production of cheese curd, including vats and tables with removable covers. Product enters the enclosed cheese vat and table at the provided product and ingredient inlet connections and ends at the final provided product outlet(s). This standard does not include equipment with capabilities for pressing curd.

The Requestor manufactures a number of pieces of cheese curd handling equipment including a belt that cottage cheese curd lays on as gravity allows the cottage cheese curd, which is very fragile to retain its shape. There is a large roller at the end of the belt and its purpose is to distribute the cottage cheese curd across the belt so its depth is less and its width across the belt is expanded. This roller's purpose is not to press the cottage cheese curd, which might fracture the curd itself, but to spread it. The belt and roller together allow for gravity drainage of some of the whey that is captured in the cottage cheese curd when originally placed on the belt.

An informal review and response by Eric Schweitzer, 3-A Technical Director and Frank Di Mattei, Chair of the 3-A Steering Committee stated that this equipment "presses" the curd and therefore falls outside of 3-A Standard 83-01.

We believe this equipment does not press the curd with the intent of forcing whey out of the curd as if this was the case, the fragile cottage cheese curd would fracture and be of no use to the manufacturer and would meet the expectations of the consumer. Therefore, we are formally requesting that 3-A SSI appoint an Interpretations Committee consisting of individuals with objectivity, no conflict of interest and experience with cottage cheese manufacturing as well as the fragility of cottage cheese curd.

We have attached equipment diagrams as well as videos showing the construction of the equipment as well as its actual operation to demonstrate that the cottage cheese curd is not pressed, but is "spread" by the roller and that this equipment should be eligible for evaluation for a 3-A symbol under Standard 83-01. All supporting information is highly confidential and is to be treated as intellectual property by 3-A as well as any and all individuals involved in the Interpretations Committee and its decision-making process.

For Interpretations Group Use

Interpretation:

Clause A1 of Standard 83-01 provides, in pertinent part:

“This standard does not include equipment with capabilities for pressing of curd.”

Following its review and deliberation, the five voting members of the Interpretations Group voted unanimously that the submitted Bepex equipment is outside the scope of 3-A Sanitary Standard 83-01.

The decision was based on the Group’s determination that:

1. The equipment includes adjustable operating features that provide the capability to apply pressure to and press the curd.
2. Clause A1 excludes equipment with the capability for pressing curd, regardless of whether an operator elects to use the full available pressure during every operation.
3. The submitted whey- and curd-draining equipment appears to constitute standalone equipment rather than an enclosed cheese vat or table covered by Standard 83-01.

The Group’s determination does not mean that sanitary criteria could not be developed for this type of equipment. It means that Standard 83-01, as presently written, is not the applicable standard under which the submitted equipment may be evaluated for authorization to display the 3-A Symbol.

Date Received: 8/17/2026	IG Chairperson: Frank DiMattei, Hy-Tech Solutions, LLC
Date Reviewed: 10/5/2026	
Date of Response: 10/13/2026	Date:10/13/2026

Instructions for Submitting Requests for Interpretations of 3-A Sanitary Standards or 3-A Accepted Practices

Requests for interpretations shall be submitted in writing to 3-A SSI using the *Request for the Interpretation of 3-A Sanitary Standards or 3-A Accepted Practices Criteria Form*. See page 1.

Requester Information: Include sufficient information so that the requester can be contacted for additional information and to receive the reply for the request.

Specific wording requested for interpretation: Copy the entire specific criteria paragraph from the standard or the accepted practice in question. If only a portion of the paragraph is of concern it may be highlighted.

Reason or concern for the interpretation: Provide a clear statement for your request for interpretation. Avoid open-ended questions and pose the question in a form such that it can be answered with a “yes” or “no” response (for example: "Does the standard allow for ..." or, “Is the design depicted in the Supporting Comments section in conformance with section ...”, as opposed to "Explain the meaning of ...").

Interpretations requests should avoid open-ended questions and be posed in such a form that can be answered with a “yes” or “no” response (for example: "Does the standard allow for ..." as opposed to "Explain the meaning of ...").

3-A SSI will promptly acknowledge receipt of the request to the requester with written information on the actions that will be taken.

3-A SSI may 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.

Requests that cannot be resolved by simple reference to a 3-A Sanitary Standard or Accepted Practice will be forwarded to the Interpretations Group (IG). For further information about the IG and Interpretation Policy, see Section 2.13 of the *Procedures for the Development and Maintenance of 3-A SSI Standards and 3-A Accepted Practices*.