



Dockets Management Branch(HFA-305)  
5630 Fishers Lane, rm. 1061  
Rockville, MD 20852

January 22, 2002

I am submitting for your review our recommendations on improving the "Food Security Guidance" [Docket No. 01D-0583]. I am including information on the following subject:

**Tamper Evident packaging for bread and buns**

The report and supporting information is attached. If you have any questions please let me know. I look forward to working with you on this subject and will help you any way that I can. We at Burford are committed to providing Tamper Evident package solutions for the well being of the consumer.

Sincerely,

Fred Springer

President

[fspringer@burford.com](mailto:fspringer@burford.com)

1-800-654-4530

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01D-0583

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**Subject: Tamper Evident Packaging for Bread and Buns**

**Recommendation:**

Include in the guideline a recommendation/requirement for bread and bun packages to be sealed in addition to the twist-tie or other similar closure. This benefits the consumer and bakery because consumers can distinguish if their product has been tampered.

**Background**

Over four years ago our company, Burford Corp. recognized that bakery products such as white bread and buns did not have a sufficient tamper evident packaging like many other products in a grocery store. We noticed that most all other products such as milk, peanut-butter, jelly, etc. have some utility for tamper-evidence. Because of our experience in developing the automatic twist-tie closure system for the bakery and being a leading developer of patented bakery equipment for over 40 years we set out to develop the following:

- Develop a Tamper Evident Closure System for baked goods
- The package should be tamper evident
- The tamper evident package must minimize consumer's risk
- The package should be consumer friendly
- The system should be easy to implement in a bakery
- The system should be compatible with existing bakery equipment
- The system must be easy to use and operate
- The system should not increase the packaging materials cost for the bakery
- The system must work with existing packaging materials

Our criteria lead to the development of the Tamper Evident Closure system in 1998. The bags produced by the Tamper Evident Closure system are included for your review. As can be seen a seal and perforation are added to an existing bread or bun bag. The seal that is added provides the tamper-evident barrier, similar to what is used in many other products. With this seal the baker and consumer's risk of the product being tampered with is greatly reduced. The perforation is added just below the seal line and is optional for the bakery. It is in place so that the consumer can easily break the seal barrier. Once the seal barrier is broken then the product has clearly been opened. This clearly benefits both the consumer and the baker. While the baker is in control of their plant, the distribution and grocery store facilities are out of their control. The Tamper Evident Seal would ensure that the consumer is opening a package that was closed at the baking facility and no other party could have opened the product.



Without the Tamper Evident Closure system in place bags can be easily opened and accessed without the consumers or the baker's knowledge. With the Tamper Evident Closure system in place the baker and consumer confidence increase dramatically and reduces the possibility of tampering. Sample bags that do not have a tamper evident barrier are also being sent for your review.

### **Technology**

The technology that is used consists of two key elements. The Burford Tamper Evident Closure System and the Burford Bag Tail Flattener literature is included for your review and discussed here.

#### **Tamper Evident Closure System(TEC100)**

The TEC100 is the machine that places a seal and perforation on the bread package. It is easily integrated into existing bread and bun packaging lines and works with existing bakery packaging equipment including automatic baggers and automatic closure systems such as the automatic twist tyer. It has also been designed to work with any other closure system such as the plastic clip closure system that is also used in the bakery.

The TEC100 uses hot air to create the seal and works with all existing packaging materials. The bakery is not required to change their packaging materials. To create tamper evident packages for baked goods all that is required is the Tamer Evident Closure System with the bag tail flattener.

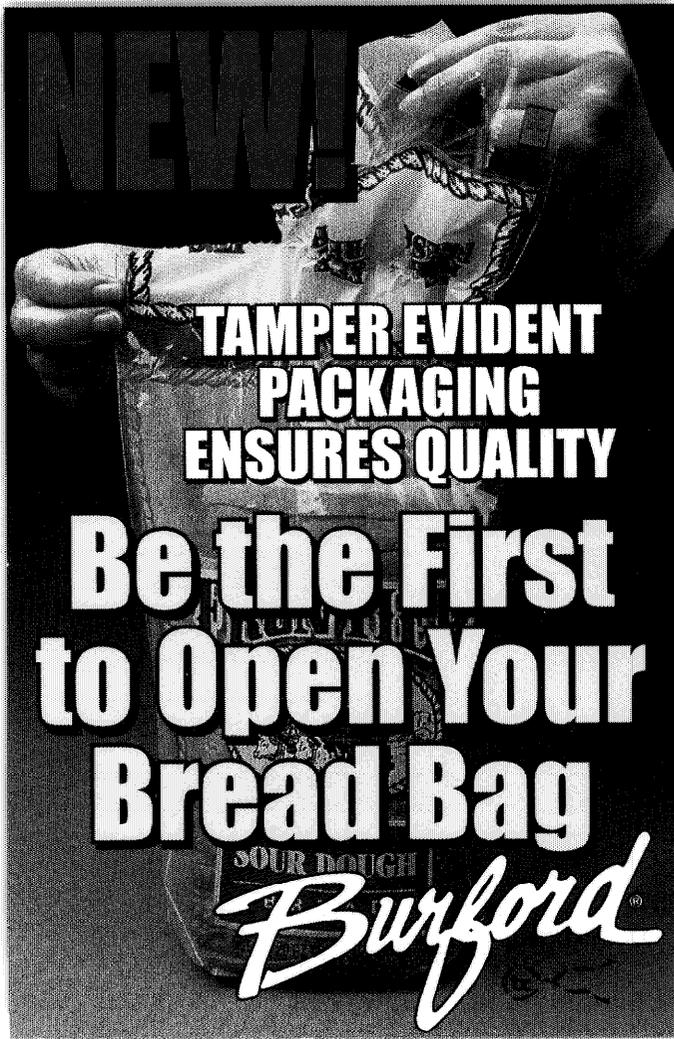
#### **Bag Tail Flattener(BF100)**

The bag tail flattener is the most recent development in the area of Tamper Evident Packaging for baked goods. It simply aligns the package flat just prior to the bread package entering the TEC100. This is required both for cosmetic improvements to the package and seal integrity improvements. With the BF100 the bakery is assured the package will be sealed consistently without folds in the package.

Literature and information for both the TEC100 and BF100 are being included for your review. Also included are two videos of the machines in operation.

### **Experience**

There are now over 100 Tamper Evident Closure systems in operation throughout the world. The international community has been migrating to the Tamper Evident Closure System at a more rapid pace than the domestic community. The units are installed in the

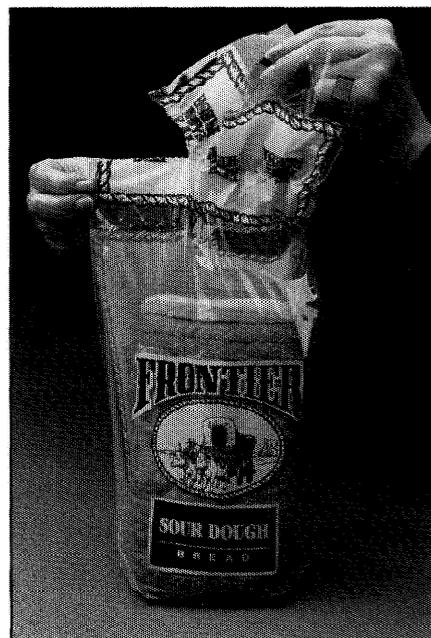
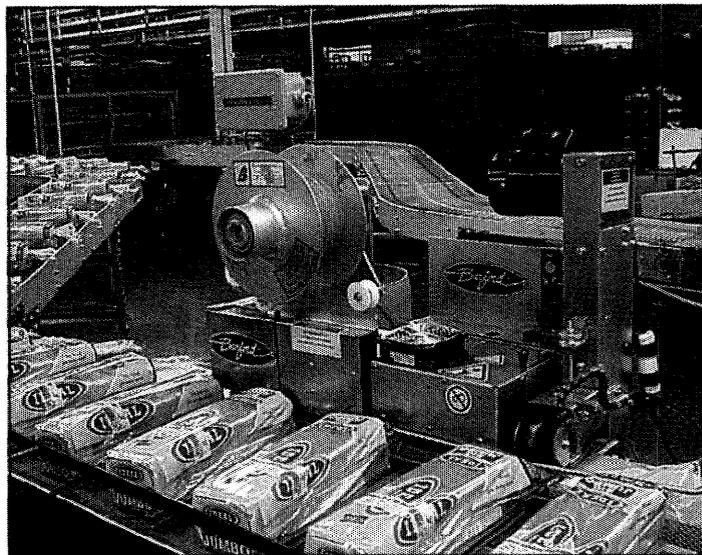
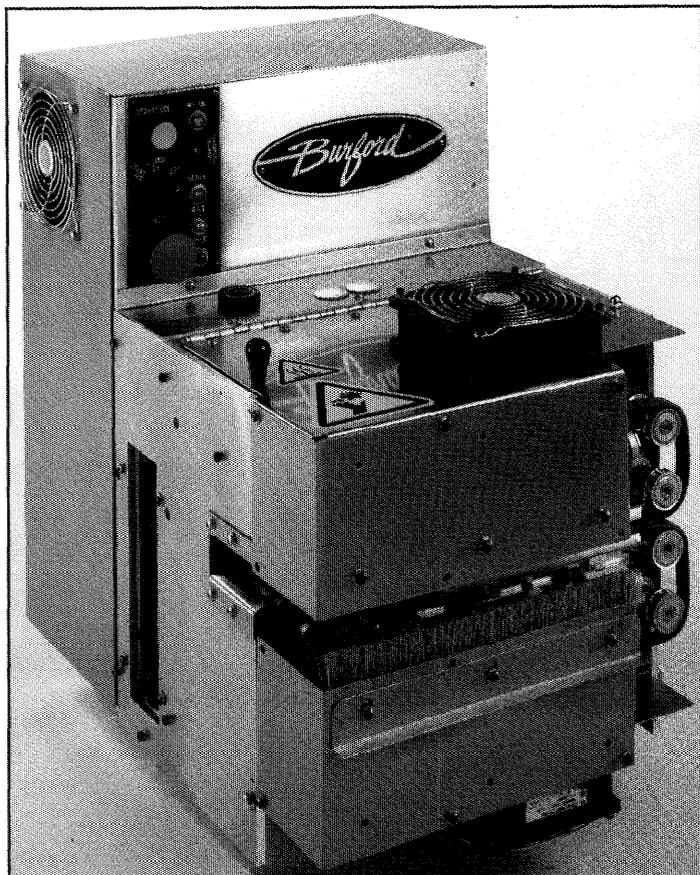


**TAMPER EVIDENT  
PACKAGING  
ENSURES QUALITY**

**Be the First  
to Open Your  
Bread Bag**

**SOUR DOUGH**  
*Burford*<sup>®</sup>

# TAMPER EVIDENT CLOSURE MODEL TEC-100



**The TEC-100 takes bread package closing to a new level. Available with a simple upgrade to the existing Model 2000 Servo Twist Tyer you can achieve a Tamper Evident Package. The system both seals and perforates the bag and uses the twist-tie for simple reclosure.**

- Tamper Evident Bag Tail
- Perforated Bag for Easy Opening
- Retrofit Kit Available for Model 2000 Servo Twist Tyers
- Retrofit Kit Available for Other Closing Machines

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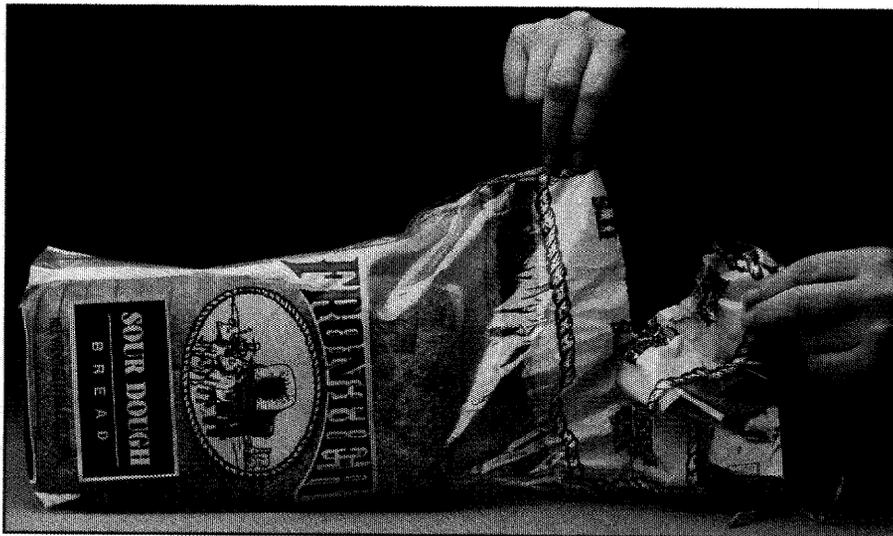
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# TAMPER EVIDENT CLOSURE

**Burford**<sup>®</sup>  
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## FEATURES

- System Uses a Non-contact Bag Fusion Method  
*The system can seal inked areas on bags, which makes the system unique to all other sealers.*
- Integration with Existing Model 2000/2100 Servo Tyer  
*Compact profile unit only requires an additional 10 inches of space beyond a typical Model 2000 Servo Tyer installation.*
- System Uses a Patent Pending Hot Air Flow System to Seal up to a 2 Mil Bag  
*The mil thickness can be increased, but requires lab testing prior to use.*
- Seals at Conveyor Speeds of up to 110 ft. per Minute
- The System Uses a Perforator Blade for Repeat Perforation
- Heel Detection System Prevents Crippled Product from Entering the System
- Sealer Maintenance is Quick and Simple
- The Sealing System will Work with Bags that are Currently Being Used by an Existing Closing System
- The System Includes a Self-contained Air Flow System
- Easy Operator Controls Including: Seal Mode, Transfer Mode and Standby Mode
- The System Adjusts Automatically for Ambient Temperature Changes that Occur in the Plant



**With both the sealing and perforating system incorporated achieving tamper evidence is simple with the TEC-100 from Burford<sup>®</sup>**

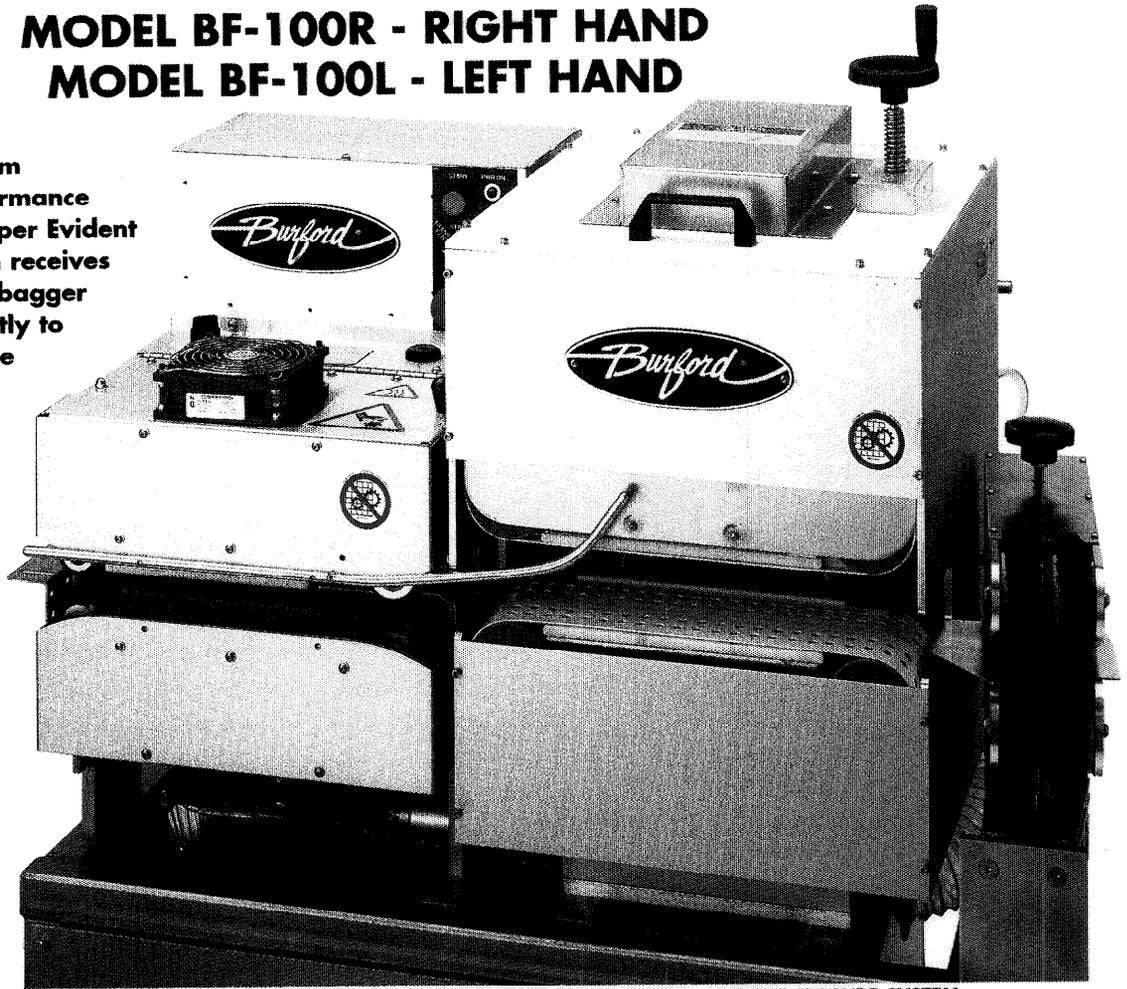
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# BAG TAIL FLATTENER

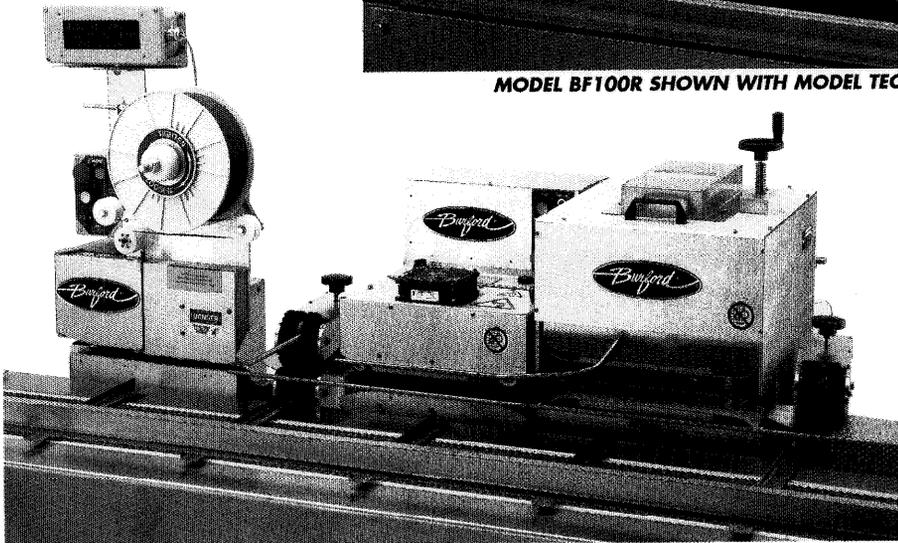
MODEL BF-100R - RIGHT HAND  
MODEL BF-100L - LEFT HAND

The Bag Tail Flattener system improves the quality, performance and consistency of the Tamper Evident Closure System. The system receives the open bag tail from the bagger and then aligns it consistently to provide a flat bag tail to the TEC system and Servo Tyer.

- Improves Seal Quality
- Enhances Seal Aesthetics
- Improves TEC Performance
- Retrofittable for Existing Servo Tyers/TEC Systems



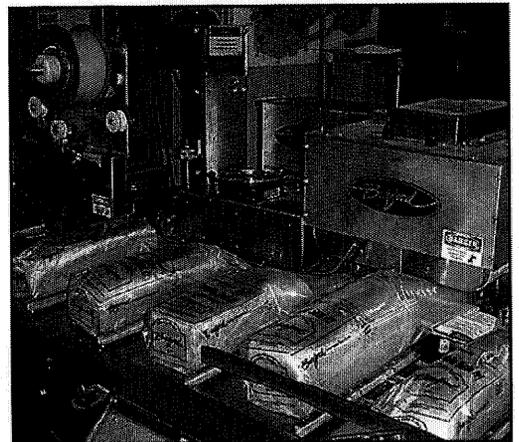
MODEL BF100R SHOWN WITH MODEL TEC100R TAMPER EVIDENT CLOSURE SYSTEM



SERVO TYER

TEC100R

BF100R



SYSTEM IN FULL PRODUCTION

**Burford**  
tc

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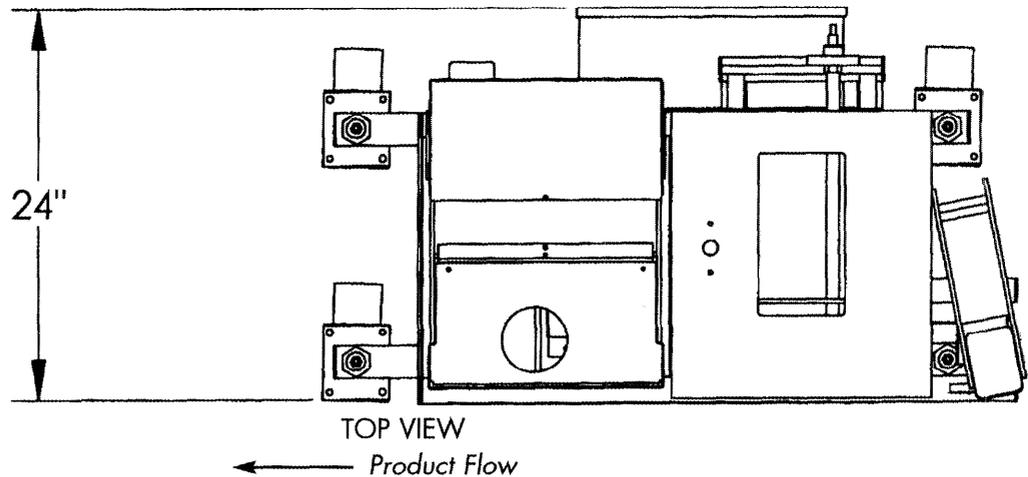
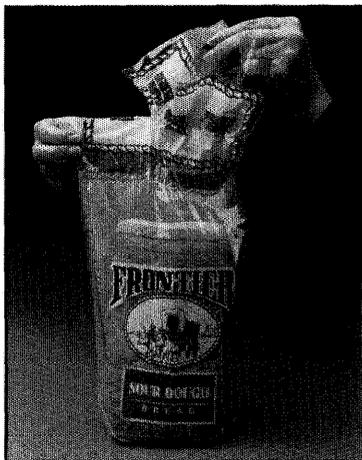
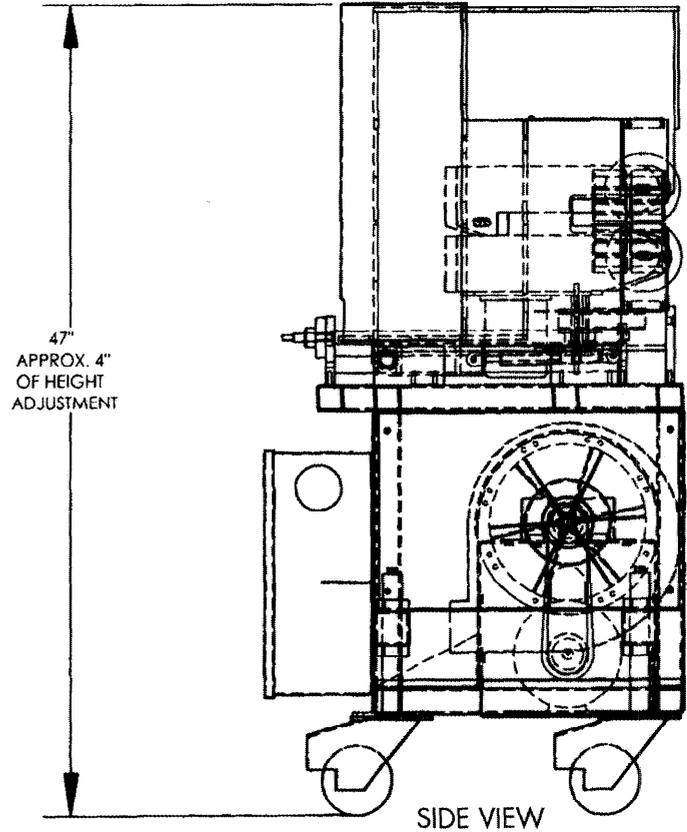
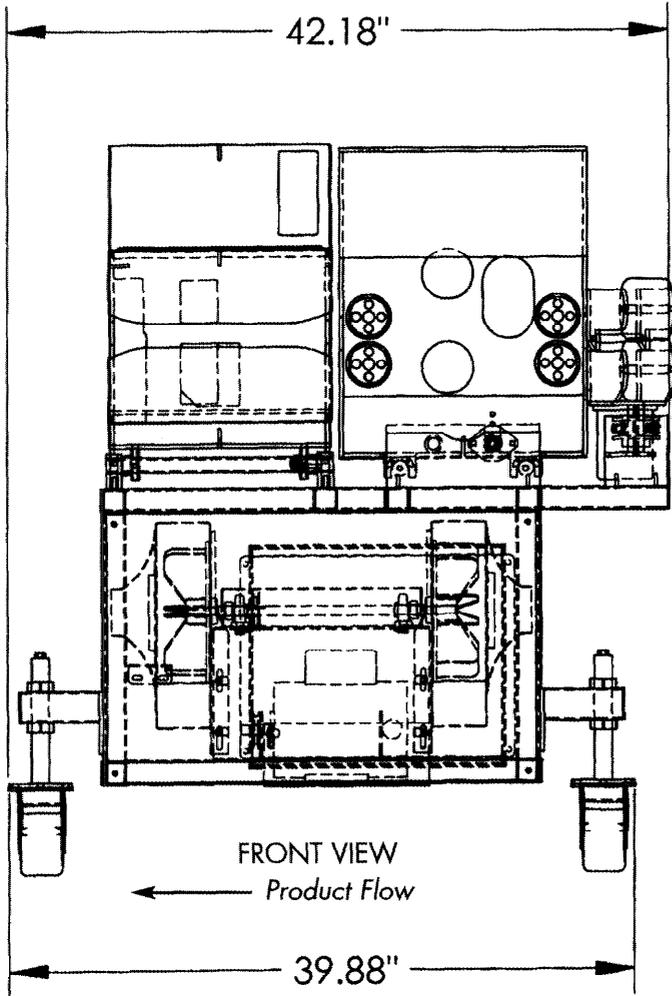
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# BAG TAIL FLATTENER



## BAG TAIL FLATTENER SHOWN WITH TEC SYSTEM

SPECIFICATIONS
220 VAC, 30 AMP
80 PSI @ 12-15 CFM

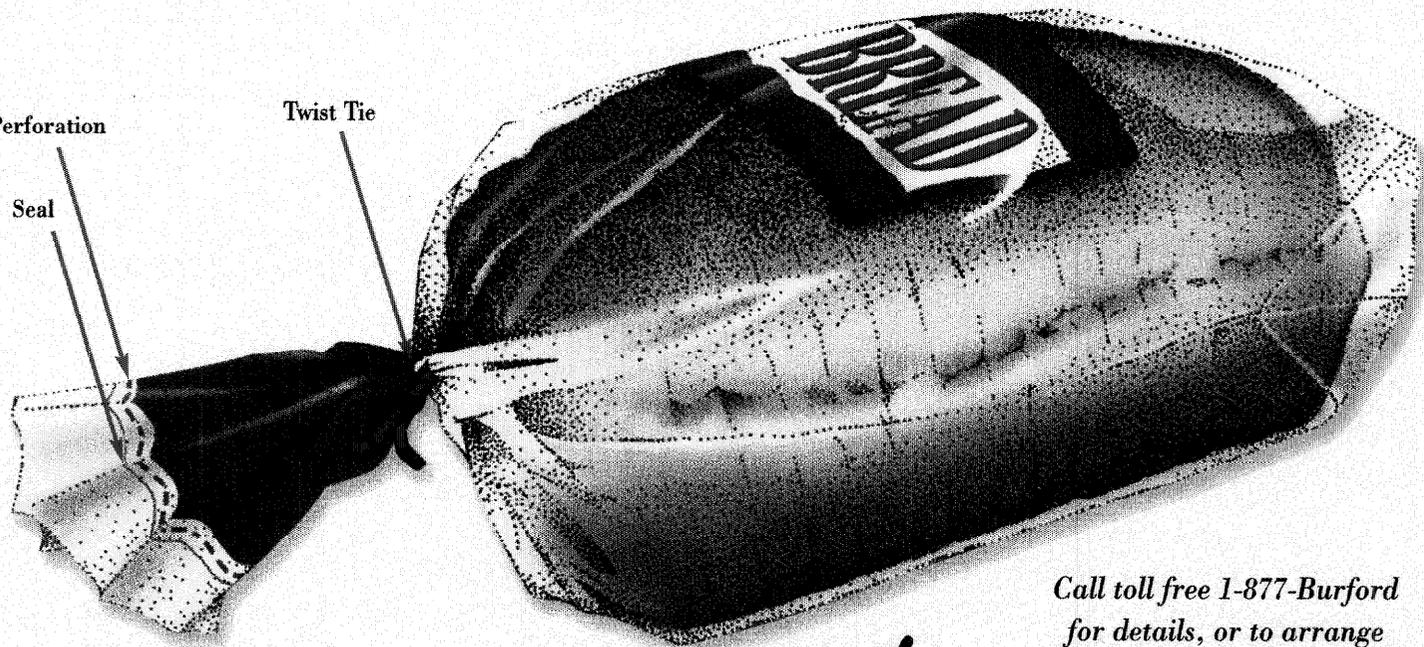


# Why Not Protect Your Bread Too?

Perforation

Twist Tie

Seal



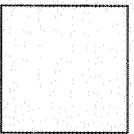
*Call toll free 1-877-Burford  
for details, or to arrange  
a test on your product.*

*Burford®*



**Burford**

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Most of what Mom puts on her family's sandwiches is available in tamper evident packaging...peanut butter, jelly, mayonnaise, mustard, cheese, cold cuts and more.

Now you can offer similar protection for your bread products.

Burford®'s new tamper evident bag closure system provides you with a sealed tail, perforated seam just below the seal for opening, and our consumer preferred twist tie closure for easy opening, re-closing and maintaining freshness.



The Burford® Tamper Evident Closure System is available either as an easy-to-install retrofit kit for existing Burford® Servo Tyers, or as an option on our Servo Tyers.

Either way, you get value added bread without changing the bread...product integrity throughout distribution and peace-of-mind at the point of purchase.

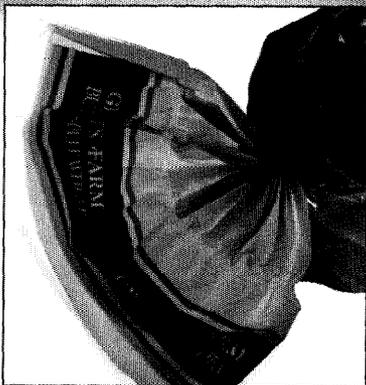
The Burford® Tamper Evident Closure System.

It's good for you, it's good for your customer,  
and it's good for your consumer.

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# Why Not Protect My Bread Too?



Sealed & perforated for your safety

Most of what's in her kitchen has a Tamper Evident Package, except for her Bread. Now, using the Burford® Tamper Evident Closure System you can provide a sealed product with an easy to open perforation, and always dependable reclosable twist-tie.

Now you can make her bread as safe as her peanut butter, jelly, and milk!

## PRACTICAL SOLUTIONS THROUGH INNOVATIVE TECHNOLOGIES

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# Milling & Baking News

The newswweekly of grain-based foods

bakingbusiness.com / world-grain.com

DECEMBER 4, 2001



## Food safety concerns draw new attention to bread/bun bag closure

MAYSVILLE, OKLA. — Bakers are taking a serious look at new ways to ensure the integrity of bread and buns at supermarkets, according to Fred Springer, executive vice-president, Burford Corp., Maysville.

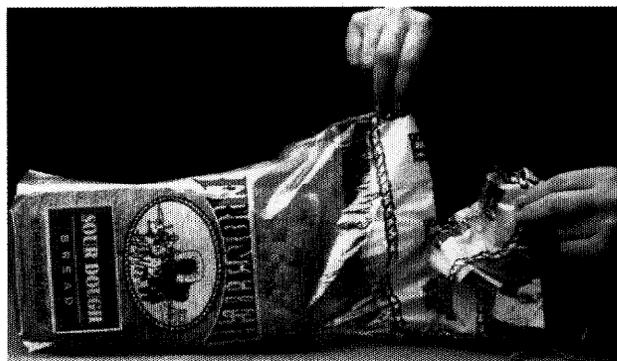
Food safety concerns have been thrust into the spotlight in the aftermath of the September terrorist attacks and the subsequent anthrax scare (see *Milling & Baking News* of Nov. 6, Page 1). In a Nov. 16 speech, Secretary of Agriculture Ann M. Veneman said, "We're doing everything that we can to prevent any kind of either accidental or intentional introduction of something into the food system."

According to Mr. Springer, one opportunity to help achieve this food safety objective is a system that seals and perforates the open end of bread bags. "Consumers are concerned about the safety of the food supply," he said. "Bakers have the opportunity to proactively and cost effectively demonstrate that they are taking steps to further protect the food supply."

Kurt Miller, Burford technical sales manager, noted that the vulnerability of most bread packaging stands out uniquely among hundreds of food products in supermarkets. "Right now, in most cases there is nothing that allows the consumer to be certain a loaf of bread hasn't been opened and tampered with," he said. "The twist tie closure on the end of the bag can be removed, someone can reach inside, perhaps put something in, replace the twist tie and the customer would not know. "If you look at milk, peanut butter, cookies, just any other product in the store, they all have some kind of tamper evident seal. The barrier lets the consumer know that they are the first to open the product. Bread generally does not have this."

Recognizing the significant cost of packaging in a baking operation, Mr. Springer said Burford looked to develop the simplest possible solution that would effectively address the problem. The Burford system, first introduced in 1998, seals the open end of the bag and inserts perforation for easy opening. The system is designed to work with any type of pony style bags and with either twist tie or other closure systems.

More recently, the company has added a device that aligns and flattens bag tails, which often have a random orientation when deposited on the discharge conveyor. Bread loaves move from the flattener to the sealer/perforator and then to the tyer.



*From peanut butter to cookies to milk, most food products at supermarkets have tamper evident packaging. Burford Corp. believes bread packages should be similarly protected using a system that seals and then perforates for easy opening the open end of bread bags.*

Mr. Springer said it was natural for Burford, a company that specializes in tyers, to look for a solution to this problem. "We're the closure guys," he said. "We felt that we could take responsibility for this segment of the baking operation."

What actually precipitated development of the tamper resistant bread package was a problem overseas, Mr. Springer said. Consumers in Italy were opening bread packages at supermarkets, removing a number of slices and then closing the bags. "A Spanish baker who exports bread to Italy told us, 'If you can develop a solution to this problem, we'll buy it.'"

"We had been toying with the idea of developing such a product. When they came to us with this proposal, we did what they asked. We built it and they bought it."

In addition to Spain, the new system has been adopted by customers in the United States, Mexico, Saudi Arabia and Japan. Japan is currently the largest market for the product, Mr. Springer said. Demand there was triggered by a completely different problem — a bug was penetrating into bags closed with clips.

More recently, sales have been made in Puerto Rico and South America. MBM

Bag Closed with  
Twist Tyer Only  
(No tamper evident protection)

Premium Quality  
**WHITEN**

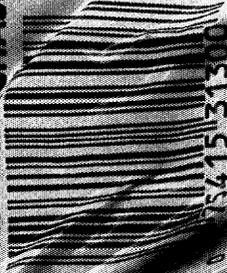
*it's  
Farm  
Fresh*

Premium Quality  
**WHITE**  
Enriched Bread

*it's  
Farm  
Fresh*

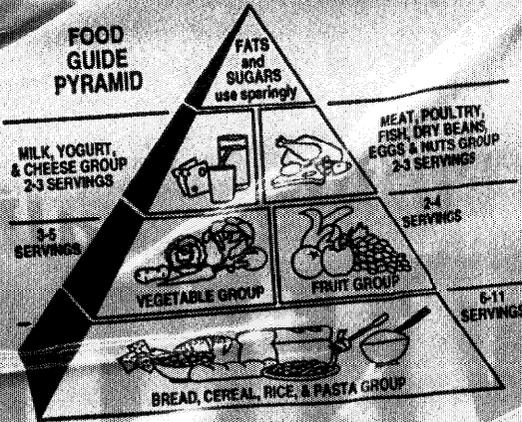
NET WT. 30 OZ. (1 LB.) (854 G)

PROOF OF PURCHASE



FARM FRESH 1 LB. WHITE ROUND T...  
FARM FRESH INC.  
105 SO. MAIN, PLYMOUTH, PA. 17460

**FOOD  
GUIDE  
PYRAMID**



Enjoy 6 to 11 servings of breads, cereals, rice and pasta daily.



**Premium Quality WHEAT**

Bag Closed with  
Tamper Evident Closure System  
Bag Flattener &  
Twist Tye

Available only from  
Tamper Evident Bread Packaging

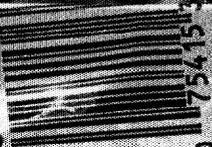
*crisp*

**LARGE**  
*it's* **WHEAT** *it's*  
**SANDWICH**  
*Farm Fresh* *Farm Fresh*

NET WT 2.0 OZ (56.7g)

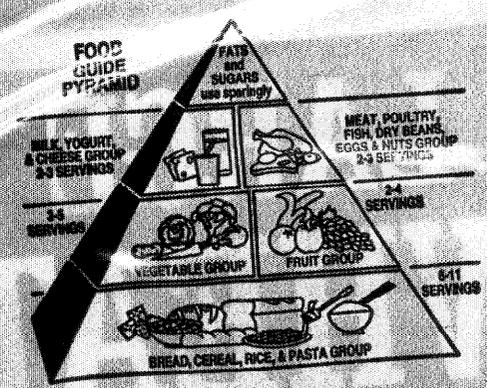
# ARCHWAY WHEAT SANDWICH

PROOF OF PURCHASE



0 75415 11111

FARM FRESH 1 1/2 LB.  
FARM FRESH  
100 SO. PALM, POND



Enjoy 6 to 11 servings of breads, cereals, rice and pasta daily.

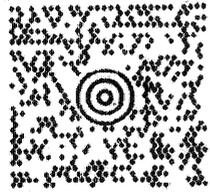


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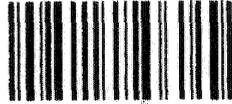
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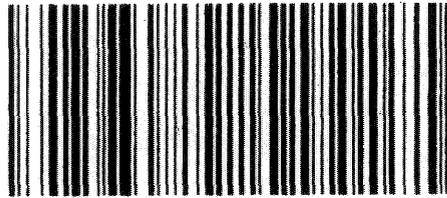
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