

10 QUESTIONS

FOR LUBRICANTS PROFESSIONALS



**EXPERT
INTERVIEW**

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A lifelong passion for lubes and food safety

The advocacy around the adoption of the right food grade lubricants assures protection and maintenance of food processing equipment from wear and tear. The said lubricants also ensure the safety of foods being processed in case of incidental contact. Professional associations such as FGLWG & ELGI have been on the forefront of advocating, enforcing and educating industry players about the need to observe FGL standards as Chairman Andreas Adam, Fragol Lubricants Sales Director, narrated to Lubezine's Kanyingi Kuria.

1. Your career spans well over 35 years in the lubricants industry. What roles in the industry have you played in this journey?

I started my working life as Marine Engineer, where I spent a number of years at sea. This helps me every day in my current work. If you meet an engineer at a plant with a technical problem it is so much easier to communicate in the same technical language.

At Burmah Castrol I did a number of years as the technical support for seagoing vessels

and later took on more commercial roles in Europe and Central America as well as more managerial positions. After 11 years at Burmah Castrol I changed to Petro-Canada working as Director EMEA for 8 years followed by almost 10 years as director EMEA for Anderol specialty lubricants. Working for FRAGOL in a "family environment" is a nice change to the corporate environment and allows me to be active as board member of the ELGI along with various other activities linked to food grade lubrication.

2. Currently, you wear two hats. What does your role entail as the:

a) Lubes Sales Director at Fragol?

FRAGOL AG (www.fragol.de) is a company with 2 business units. We have a very strong department with heat transfer fluids that is marketed under our brand. I am active in the sales of private label lubricants in the markets outside Germany-focus being synthetic lubricants for compressor and vacuum application and to provide a portfolio of H1 lubricants for companies that wish to expand their portfolio with high quality ISO21469 produced food grade lubricants. As such I do travel a good part of my time to many parts around the world.

b) Chairman of the ELGI Food Grade Lubricants Working Group?

As chairman of the Food Grade Lubricants Working Group, I try to inform the colleagues in the industry about developments as well as issues affecting the market. The biggest impact on our industry is not coming from within but is generated in the market where we as lubricant producers normally do not participate.

The recent MOASH and MOAH issue came from chocolate through packaging materials, via printing ink in recycled paper to the mineral base oil producers and finally to the lubricant industry, the blenders and marketers. As working group we must find ways to be informed. In 2018 we assisted by giving training to a number of auditors of food production sites with a goal to increase their knowledge and understanding of lubricants and its use. Another example is the industry position paper to increase awareness and proper use of food grade lubricants.

c) What are the key roles ELGI undertakes in the market?

The ELGI (www.elgi.org) is the organization that bring together the producers and marketers of greases, but also the connection industry like base oils additives, packaging etc. The ELGI has a strong technical focus as can be seen by the various working groups that are often at the front of new test methods or product development.

3. Marketing of FGLs to already enlightened customers could be made more straightforward. How do you rate the knowledge of FGLs on the side of

customers (food manufacturers) and do you think this affects not just the marketing of FGLs, but also other aspects like food safety?

Unfortunately there is still a lot of uncertainty at user level and even at the companies that market the lubricants. I can see this from the many questions I receive on a monthly basis. For that reason the ELGI has made a position paper to clarify most common questions.

To name some, if you have lubricant leakage into the food stuff you must immediately repair. Lubricants are for INCIDENTAL FOOD CONTACT, not to postpone repairs. If you have a leakage at, say hydraulics, of your H1 lubricant, change to a 3H (food additive) and problem solved. Again this is wrong because if you have a lubricant application and it must be H1. The use of 3H is clearly defined in the 21CFR172.878.

4. Lubricants and especially FGLs are, by and large, sophisticated technical products. Could you briefly take us through some of the production and certification processes an FGL manufacturer must adhere to, before launching the finished product to the market?

A food grade lubricant has in its technical behaviour exactly the same task as any industrial lubricant. The difference lies in the availability of chemistries. Not all types of base oils and additives are allowed for use, or are limited in the volume in a lubricant blend. It is therefore important that the developer of the lubricant has extremely good knowledge of the performance of the components and seeks synergy between these components. All components must be listed in the white book based on allowance by the FDA and these are categorized as HXL. In addition, the ISO21469 places special demands on the facility where basically an HACCP is done on the production site.

5. What is ISO 21469:2006 as concerns FGL, how is it enforced on the full life cycle of Food grade lubricants and is it mandatory for FGLs to be ISO 21469 certified?

A lubricant producer has the free choice to obtain the ISO21469 standard. Most countries do not have a demand for this level just yet. However, as safety and compliance are crucial in many of the food producing

companies feel the need to prove that the lubricants in use meet all desirable criteria. It is simply the best practice today for food grade lubricants. Lubricants are technical products and as such have a limited life, dependent on how severe the conditions are. The ISO21469 applies to the product and advises a shelf life.

6. Is it mandatory for ISO 21469 certified lubricants to be listed by NSF? Hence can or should the end user/buyer comprehensively use this database to confirm if a manufacturer or product is certified?

ISO21469 is not exclusively done by NSF. There are other auditing bodies that provide this service. It is recommended to choose a lubricant partner that has the ISO21469. Since the H1 registration is just that, as submission of a formulation that is verified against the white book, based on the 21CFR1178.3570, the ISO21469 is audited and makes certain that the products produced are of the same standard as the submitted formulation.

7. Are there regulations that control the repackaging of FGLs relating to the process and claiming certifications of the original product?

Re-packing any lubricant is always introducing the risk of contamination. When food grade lubricants are re-packed at any other site than the original producer certainly the ISO21469 has become null and void. On top of that, certification for HALAL and KOSHER will no longer be acceptable. It is highly recommended to receive the lubricants in the original packaging-sealed. If in doubt, contact the producer and receive verification of the product via label information such as batch number and production date or best before date. ISO21469 demands this information to be on the label.



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8. Europe has arguably an advanced structure of enforcing Food Grade Lubricants regulations and policies. How do you think this can be transferred to other parts of the world where clear regulations and policies lack?

Unfortunately, Europe has no legislations regarding lubricants but extensive regulations related to materials coming in contact with food. One major regulation or advisory on the same is apply lubricants –as little as technically feasible. Currently, the most common used system is based on the various 21CFR’s code of federal regulations from the USA.

Some 20 years ago, the USDA stopped the system where they used letters and numbers where lubricants were in the category H1. NSF(www.nsf.org) still continued this system and, some 10 years ago, INS also entered this market of registrations (www.insservices.eu).

9. On challenges, what are some of the significant challenges that the global FGL industry is still struggling with and what is the best solution approach to them?

The main challenge I see toward the future is compliance with new regulations and legislation. Education of the many stakeholders, governments, NGO’s, food stuff producers, food plant auditors, packaging producers etc. will be needed to get a more realistic approach toward the safety and exposure of food grade lubricants.

10. What advancement or hindrance do you think is going to revolutionize the future trend of FGLs?

The food grade lubricants will be impacted by legislations by the EU, USA and likely China and others. The risk of chemical products entering foodstuff in some production processes is not 100% avoidable, and this will likely require very extensive toxicology data that could well be outside the economic feasibility of lubricant producers.

In that case redesign of equipment or new chemistries for lubricants will be required. If we can show legislators that the lubricants are safe when properly used and provide the best guarantee for economical mechanized food products with acceptable to no risk, we have a good future ahead of us with a very good growth potential. ■