

Food-Safe vs. Food-Grade IBCs

Why a new product-contact system matters more than a used-container label

THE QUICK CONCLUSION

"Food-grade" is often used as a loose description. It does not tell you the container history, what was replaced, how it was cleaned, or whether it is suitable for your food. "Food-safe" is the better conclusion to seek. For most food and beverage applications, a rebottled IBC with a new bottle and new wetted components provides the clearest, most defensible path to that conclusion.

01 The problem with "food-grade"

Some sellers use "food-grade" as though it were a condition grade for a used IBC. The phrase may sound reassuring, but it does not answer the questions that matter most:

- Was the inner bottle previously used?
- What were the prior contents?
- Are the valve, gaskets, cap, vent, and other product-contact parts new or reused?
- Does the documentation cover the actual food, temperature, contact time, and use?
- Has the complete IBC been approved for the buyer's sanitation, quality, and handling requirements?

A used bottle does not become suitable for food merely because it previously held food, looks clean, or is called "food-grade." Cleaning, prior-use control, component history, and documentation still matter.

02 Why "food-safe" is the better question

"Food-safe" focuses attention on the result: Is this complete container suitable for this food under the actual conditions in which it will be filled, stored, transported, emptied, and possibly reused?

IMPORTANT

"Food-safe" should be treated as a supported conclusion, not another sticker or sales grade. The conclusion depends on the complete product-contact system and the intended use.

A rebottled IBC places a new inner bottle into an inspected outer cage and pallet assembly. When the valve, gaskets, cap, vent, and other wetted service parts are also new, the food does not contact the used bottle or its prior contents.

That materially reduces the uncertainty associated with a washed and reused inner bottle. It is why Clean Tank considers a properly documented rebottled configuration the logical starting point for food-safe food and beverage service.

A rebottle should support all four of these conclusions:

- New contact surfaces: The bottle and specified wetted service components are new.
- Appropriate food-contact support: The actual components are supported for the intended food and conditions of use.
- Application suitability: The food, temperature, contact time, sanitation chemistry, transfer method, and handling are compatible with the package.
- Traceable release: The delivered IBC and its required documentation can be matched and inspected before filling.

THE PRACTICAL BUYING SPECIFICATION

Ask for a rebottled IBC with a new inner bottle and new product-contact valve, gaskets, cap, vent, and closures; component-specific food-contact documentation for the intended use; an inspected outer assembly; and identifiable release records.

What a new bottle does not prove by itself

A new bottle is the central improvement, but it is not the entire product-contact system. If a seller reuses the valve or other wetted parts, those parts retain their own history. A generic resin statement also does not establish that every component is supported for the intended food and use.

Used-component contamination is not always visible

Used service components contain enclosed, overlapping, threaded, and compressed areas that can retain foreign material even when exposed surfaces appear clean. Examples include:

- Valve chambers and internal passages, including the areas behind the valve member and around seals.
- Lid threads, underside recesses, vent assemblies, plugs, and other features that are difficult to see or directly inspect.
- Lid gaskets, valve gaskets, and O-rings that can trap residue at contact faces or within compressed and damaged surfaces.
- Protective caps, adapters, and fittings that may have been stored or handled separately from the bottle.

Component identity also matters. A used valve, lid, or gasket may be native to the original bottle, or it may have been removed from another IBC and installed during prior service or reconditioning. If the history is not controlled, the component cannot reliably inherit the bottle's prior-content record. Even a component known to be original shares the bottle's prior-use and cleaning history.

TECHNICAL POSITION

For a food-safe rebottled configuration, specify new wetted service components rather than relying on the appearance, cleaning, or assumed history of used valves, lids, gaskets, vents, caps, or fittings.

04 The supplier should be able to answer

- Which product-contact components are new?
- Who manufactured them, and how are they identified?
- What is the regulatory basis for their intended food-contact use?
- What food types, temperatures, contact times, and reuse conditions are covered?
- What changes or substitutions require notice to the buyer?
- How is the outer assembly inspected and the completed IBC released?

05 Wine and other sensitive beverages

Wine does not require a different definition of "food-safe." It does require a more specific application review. The buyer should identify:

- Actual alcohol content. FDA food-contact classifications distinguish beverages containing up to 8 percent alcohol from those containing more than 8 percent.
- Acidity, additives, fill and storage temperature, and maximum contact time.
- Sensory limits, odor neutrality, oxygen-management expectations, and shelf-life requirements.
- Winery sanitation, transfer, venting, and closure procedures.

Those facts determine whether the selected components and package are suitable for the wine. They do not make a cleaned used bottle equivalent to a new product-contact system.

RECOMMENDED CUSTOMER LANGUAGE

Instead of asking, "Is this a food-grade tote?" ask: "Can you supply a food-safe rebottled IBC for our product and use, with a new bottle, new wetted components, and documentation that identifies what is covered?"

06 Before filling

- Match the IBC to the purchase specification and required documents.
- Inspect the bottle, cage, pallet, valve, closures, seals, and protective caps.
- Reject or quarantine units with damage, moisture, residue, foreign material, objectionable odor, or missing documentation.
- Follow the food producer's own sanitation and release procedure.

Use this checklist when a supplier describes an IBC as "food-grade," "food-safe," or suitable for food and beverage service. A checked box should reflect an answer supported by the purchase specification or supplier documentation.

- ☐ The IBC is rebottled with a new inner bottle.
- ☐ The valve and internal valve parts are new.
- ☐ The lid, lid gasket, vent, caps, closures, and other wetted components are new.
- ☐ The supplier identifies which components are new and which, if any, are reused.
- ☐ No product-contact component depends on an assumed or untraceable prior-use history.
- ☐ Food-contact documentation identifies the actual supplied components or product grades.
- ☐ The documentation covers the intended food conditions.
- ☐ The outer cage and pallet assembly have been inspected and released.
- ☐ The complete IBC has no visible damage, moisture, residue, foreign material, or objectionable odor.
- ☐ The buyer's sanitation, compatibility, quality, and receiving requirements are documented.
- ☐ Exceptions are quarantined rather than filled while questions remain unresolved.

EVALUATION RESULT

If any required item cannot be checked, do not rely on the words "food-grade" or "food-safe" alone. Resolve the missing component, history, documentation, or application question before filling.

Primary references and document control

U.S. FDA, Determining the Regulatory Status of Components of a Food Contact Material. FDA explains that the status of a food-contact material depends on the substances that comprise the article, their specifications, manufacturers where applicable, and limitations on conditions of use.

<https://www.fda.gov/food/packaging-food-contact-substances-fcs/determining-regulatory-status-components-food-contact-material>

U.S. FDA, Food Types and Conditions of Use for Food Contact Substances.

<https://www.fda.gov/food/packaging-food-contact-substances-fcs/food-types-conditions-use-food-contact-substances>

General educational information only. Food producers remain responsible for approving packaging for their products, processes, customers, and applicable requirements.

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