



ECOLAB
FOOD SAFETY
INSTITUTE

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QUESTION:

Our ready meals manufacturing operation is about to be certified against the BRC Global Standard for Food Safety, issue 8. Our BRC auditor wants proof that the sanitizer we are using is registered in the state of Kansas where our plant is located and that it is formulated to inactivate the pathogens of concern we have identified for our products within our food safety plan. We purchased this sanitizer from our approved chemical supplier and have all of the supporting documentation for it (letter of guaranty, safety data sheet, label on the drum, etc.). Are these questions legitimate? I've never had this questioned before. How can I prove to the auditor that the sanitizer is appropriate for our operation and is also approved in the state of Kansas?

ANSWER:

The question is fair and pretty simple to prove. In the U.S., sanitizers, disinfectants and other antimicrobials are registered as "pesticides." It is the U.S. Environmental Protection Agency (EPA) that reviews the application, the claims and data submitted and provides Federal registration for the pesticide product. Additionally, the product must be registered in each of the states it is distributed or sold in, plus the District of Columbia and Puerto Rico (which falls under U.S. EPA and FDA jurisdictional requirements). There is an annual renewal process that your chemical supplier must maintain. You can prove the product is registered by contacting your state's pesticide registration department or by doing a "Pesticide Product Search" on your state's website.

Be aware that other countries (and like the U.S. these may differ by state/province) have other processes for registering pesticide products. The approved chemical supplier to your plants operating in other parts of the world needs to be aware of those processes and ensure they are following the requirements for each country/state.

In the U.S., if a sanitizer makes a specific pathogen claim on the product label it must be approved with the EPA through a standard recognized test (e.g. AOAC Germicidal Detergent Sanitizer Test) and the manufacturer must supply the data to the regulatory body as part of the registration process. Sanitizers applied to hard non-porous food contact surfaces require a minimum 5 log reduction of the pathogen (or 99.999%) while those applied to hard non-porous non-food contact surfaces require a minimum 3log reduction (or 99.9%). This data is used by the manufacturer to create the usage instructions on the label. By Federal law, sanitizers must be used in accordance with the label instructions.

UPCOMING TRAINING 2019

EAGAN MINNESOTA

[Sanitation Food Safety Workshop \(Customer ONLY\)](#)

[Implementing the SQF Food Safety Code in Food Manufacturing Operations \(May 8-9\)](#)

[Advanced HACCP \(August 7-8\)](#)

[Preventive Controls for Human Foods \(June 19-21\)](#)

[Preventive Controls for Human Foods \(September 11-13\)](#)

CONCORD, NORTH CAROLINA

[Implementing SQF Food Safety Code in Food Manufacturing Operations \(January 21-22\)](#)

[Advanced HACCP \(February 18-19\)](#)

[Internal Auditor \(March 18-19\)](#)

[Implementing SQF Food Safety Code in Food Manufacturing Operations \(April 22-23\)](#)

[Advanced HACCP \(June 17-18\)](#)

[Internal Auditing \(July 22-23\)](#)

Implementing SQF Food Safety Code in Food Manufacturing Operations (August 19-20)
Advanced HACCP (September 23-24)

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WORLD CLASS SERVICE & EXPERTISE: ECOLAB F&B TRAINING

Are you equipped with a consistent approach? Making the right sanitation choices has never been more critical to **protecting food safety and product quality** while boosting your profits and operational efficiency! Our consultants can also help you develop, implement and verify your food safety programs and help you prepare for an audit.

COMPREHENSIVE TRAINING COURSES

We offer training courses to help you and your employees stay current and strengthen your food safety programs. Our breadth of resources and integrated business model help ensure consistency across your operation. Courses include: Implementing SQF Systems, Advanced SQF Practitioner, Advanced HACCP, Preventive Controls for Human Foods (FSMA/PCQI), Internal Auditing, FSSC 22000. [Click here](#) for the full training schedule and register for the nearest course.

DO YOU HAVE A QUESTION?

Contact us for more information on food safety management programs and consulting services, inquiries about on-site training at your location for large groups, educational webinars, e-learning modules and other specialized training.

Every day, the Ecolab Technical Customer Service line receives hundreds of calls from customers seeking help on a wide variety of issues including the GFSI recognized programs like BRC Food, SQF, FSSC 22000. **Email us** your questions.

[Click here](#) to download past issues of the Food Safety Institute *Flash* newsletter.

ABOUT THE EXPERT



Dr. Tatiana Lorca manages food safety training programs for Ecolab. She is a registered SQF Trainer, FSMA/PCQI lead instructor and IHA approved HACCP Trainer. Previously, she was the technical manager for the SQF (Safe Quality Food) Institute, a division of the Food Marketing Institute. [Email Tatiana](#)

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