



**ECOLAB**  
FOOD SAFETY  
INSTITUTE

**April 2019**

## QUESTION:

During our recent recertification audit against the SQF Food Safety Code for Manufacturing (ed. 8) the auditor issued a nonconformity because we were not testing the concentration of a specific sanitizer before using it. I pointed out that the sanitizer was in ready to use form (as stated on the label) and we were using it in accordance to the label requirements and we were not diluting it before use. The auditor was still not satisfied. To me it seems like a waste of resources and time to measure the concentrations of a ready to use chemical we are using as per label instructions. Is the auditor correct?

## ANSWER:

The auditor is not correct, the product is ready to use and not diluted, therefore you can rely on the concentration on the label and meet the requirement by following the label usage instructions.

As per 11.2.13.1 (Cleaning and Sanitation): *The methods and responsibility for the cleaning of the food handling and processing equipment and environment, storage areas, staff amenities and toilet facilities shall be documented and implemented. Consideration shall be given to:...v. Methods used to confirm the correct concentrations of detergents and sanitizers.*

A new requirement was introduced into ed.8 to address chemicals that need to be mixed prior to use and this would include those that are mixed with water (i.e., diluted): 11.2.13.9 *Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.*

The intent behind both clauses is to ensure that the facility is using the correct strength of the

chemical and there is a method in place to confirm this. You need to assure you are purchasing the ready to use sanitizer from an approved supplier (ensure the company is listed on your contracted services (2.3.3.2) or approved supplier lists (2.4.4.10) and the supplier meets the appropriate criteria to prove they have controls in their operation for the manufacture of the product to specification (e.g. ISO 9001 certification). Additionally, you should have the appropriate documentation for the product available such as Safety Data Sheet (SDS) and Letter of Guaranty (LOG) that speaks to the suitability of use of the product. If you can provide the documentation and you are using the product as per the label instructions, there is no need to further test the sanitizer to prove the concentration. So, it comes down to common sense...if you do not have to mix a chemical because it is ready to use, there's no need to verify the concentration.

Ensure you are properly documenting your cleaning and sanitation program requirements to account for the types of products you are using (e.g., ready to use, those requiring mixing or diluting). Do not get caught documenting a requirement that would put you outside of the legal and label usage of your chemicals as this could create employee safety concerns or affect the efficacy of your cleaning and sanitation program.

## UPCOMING TRAINING

### EAGAN MINNESOTA

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

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

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

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

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

### CONCORD, NORTH CAROLINA: CONTACT 704-796-2755 DIRECTLY TO REGISTER

[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), and Internal Auditing. [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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