

16 April 2019

Mr Adekunle Adeoye
Microbiological Risk Assessment
ACMSF Secretariat
Food Standards Agency
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www.chilledfood.org/FBIG

Dear Mr Adeoye,

QACS, BIOCIDES AND CHLORINE-BASED DISINFECTANTS USED IN FOOD PROCESSING

Thank you for inviting further information from FBIG member associations to assist in the risk assessment of potential hygiene biocides restrictions through EU legislation.

We note that the questions asked in this latest request repeat those which were put last autumn, and to which we responded in detail in our letter of 23/9/18 (enclosed).

To recap, the Food & Biocides Industry Group (FBIG) comprises some 20 UK trade and professional organisations from farm to fork working together to ensure that legislation does not negatively impact on the availability of effective disinfectants vital to assure food hygiene through the food chain. A number of organisations participating in FBIG received your invitation to comment, and have agreed this submission.

FBIG has developed free guidance on **The Use of Biocides in Cleaning and Disinfection**¹, which has been used by the **Global Food Safety Initiative** to result in two new volumes of guidance (enclosed):

- **Chemicals in Food Hygiene. Volume 1: The optimal usage of cleaning agents, sanitisers and disinfectants to minimise the risk of traces in foods**². This document provides overview of the considerations that an FBO (from farmer to foodservice/final packaged product producer) needs to consider in relation to ensuring appropriate hygienic practices. It focuses on the responsible and effective use of chemicals in food hygiene cleaning and disinfection, especially of food equipment and other food contact surfaces, including hands. The aim is to minimise the risk of hygiene biocide traces in food whilst ensuring microbiological efficacy.
- **Chemicals in Food Hygiene. Volume 2: cleaning agents, sanitisers and disinfectants in food businesses: detection of traces and human risk assessment processes**³. This document contains a detailed description of how to make a formal risk assessment of critical chemical traces. Criteria and approaches for risk assessment in relation to the procurement, application and use of chemicals in food hygiene for food businesses and primary producers are provided for use as a guideline along with a number of tools to support the risk assessment process.

In terms of potential impact of not being able to apply hygiene biocides effectively, we would draw to your attention the following major fatal food safety incidents where hygiene was not managed using biocides appropriately:

- **Stanley Royd Hospital Salmonella fatal outbreak, 1984**. 461 cases. 19 people died. "The Inquiry's report frequently noted this failure to adhere to correct food handling, preparation, and cleaning procedures. A startling example was the practice of kitchen tables being cleaned and then wiped off with the same

¹ <https://www.chilledfood.org/wp-content/uploads/2018/08/Biocides-Cleaning-and-Disinfection-working-document-industry-guidance-18-10-16-with-updated-best-practice-example-FBIG-logo-in-progress.pdf>

² [https://www.mygfsi.com/files/Chemicals in Food Hygiene Volume 1 FINAL.pdf](https://www.mygfsi.com/files/Chemicals%20in%20Food%20Hygiene%20Volume%201%20FINAL.pdf)

³ [https://www.mygfsi.com/files/Chemicals in Food Hygiene Volume 2 FINAL.pdf](https://www.mygfsi.com/files/Chemicals%20in%20Food%20Hygiene%20Volume%202%20FINAL.pdf)

squeegees that were used on the floors.” (Wallis, J. In *The Shadow Of The Asylum: The Stanley Royd Salmonella Outbreak Of 1984. Medical Humanities*, 42, 2016⁴).

- **John Barr *E. coli* O157 fatal outbreak, 1996.** 503 cases, of which 279 were confirmed. 26 people died. The “butcher thought biodegradable detergent was a bactericide... led him to contaminate the whole of his premises and many cooked products with *E. coli* O157” (Pennington 1 report, 1996). “*a bactericidal agent was not being used*” (Sherriff’s report)⁵
- **John Tudor *E. coli* O157 outbreak, 2005.** 157 cases, of which 1118 were confirmed. 1 person, 5 year old Mason Jones, died. “FSA should remove the confusion that exists among FBOs about what solution(s) should be used to prevent cross-contamination from surfaces and equipment. (Recommendation 6, Pennington 2 report, 2009)

FSA’s 2018 *E. coli* cross-contamination guidance⁶ requires cleaning and disinfection to be carried out, repeating this numerous times in the document:

- ‘Effective cleaning and disinfection procedures’ (page 8)
- ‘Worktops must be thoroughly cleaned and disinfected’ (page 13)
- ‘Cleaning and disinfection’ section (page 22-27)

The EU general food hygiene regulation 852/2004 requires “surfaces in contact with food are to be in sound condition and be easy to clean and, where necessary, to disinfect.”

The USDA DHHS Interagency Risk Assessment: *Listeria monocytogenes* in Retail Delicatessens. Technical Report, September 2013 found that “Lack of any sanitation increases the predicted risk by 50%; eliminating cross contamination and reducing incoming *L. monocytogenes* levels reduces the predicted risk by 30% and 16%, respectively.”⁷

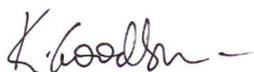
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To conclude, we welcome ACMSF reviewing potential impacts of regulatory changes both made to date and proposed in relation to the use of biocides for food hygiene assurance, and are happy to offer assistance.

In broad terms we are specifically seeking:

1. Continued ability for FBOs to responsibly use effective biocides
2. Recognition in law that FBOs need to be able to protect hygiene for public health by responsible, effective use of biocides
3. A full risk assessment of impacts of biocide regulation review on hygiene including water
4. A rational basis for regulation
5. Cessation of regulation under 396/2005 of biocides used for hygiene and not as pesticides
6. No ‘gold plating’ of interpretation, e.g. applying PP legislation to end products not listed in 396/2005
7. Clear enforcement guidance and rationale

Yours sincerely,



KAARIN GOODBURN MBE

Enclosures: GFSI Chemicals in Food Hygiene guidance volumes 1 and 2

⁴ <https://mh.bmj.com/content/42/1/11>

⁵ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4149388>

⁶ <https://www.food.gov.uk/sites/default/files/media/document/ecoli-cross-contamination-guidance-v3.pdf>

⁷ <https://www.govinfo.gov/content/pkg/FR-2013-05-13/pdf/2013-11298.pdf>