

26/09/2017 (ex 18/04/2017) H3831

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Global Proficiency Ltd for AsureQuality Ltd,
3-5 Lillie Cres. Tullamarine Vic 3043,
Australia +61 3 83189014/
& Ruakura Research Centre, Hamilton East,
P O Box 20474 Hamilton.

To whom it may concern,

(CRC Industries) Exoff Food Grade Degreaser And Cleaner (was Exoff-1 Cleaner) H3831 26-09-2017

- Product description: water based cleaner & degreaser
- Product use: for cleaning grease & grime from hard surfaces including metal & concrete

"Passed AsureQuality assessment for food/beverage/dairy factory food areas non-food contact surfaces H3831 with conditions". This assessment was prepared by Global Proficiency Ltd using HACCP principles to determine equivalence with food standards listed below. See <http://assessedproducts.asurequality.com/>. This supports food Risk Management Programmes & other endorsements that may apply to this product include MPI regulated farm dairy approval, MPI dairy factory endorsement, MPI regulated non-dairy animal product approvals, EPA HSNO-OSH environment approval (& previously AQIS).

Conditions:

- Used per instructions, legislation, & GMP for food areas non-food contact surfaces.
- Usage /carry-over to food should be avoided to ensure there are not residues minimised to ensure food function or composition are not affected, that residues are within applicable Maximum Residue Limits (MRLs/MAVs), & that food legislation requirements are met.
- The assessment is subject to notification of change and expires on 18/04/2022).
- The full report is attached for supplier review and verification. The assessment is activated by countersigning.

Prepared by Global Proficiency for AsureQuality Ltd.. *R.G. Hutchinson*

Supplier: *[Signature]* Date: *26/09/2017*

Scope and purpose of the assessment:

- Asurequality assessment is a non-regulated, voluntary, and evidential certification by the supplier demonstrating equivalence with food safety standards, and also that product instructions address hazards for staff & equipment. The assessment is independently confirmed, without prejudice or guarantee, using information submitted by the supplier or from other sources. Confidentiality of the product formulation is maintained using coded material identifiers in the report, and appendices containing confidential information are provided only to the supplier.
- Scope: NZ checks (FSANZ, US FDA 21 CFR/ NSF, Food Chemicals Codex, EPA NZ, EU, French culinary listings or related data for equivalent safety). NZ background (Animal Products Act, Risk Management Programmes. Detergent & Sanitiser Manufacturer's Code of Practice, Detergent & Sanitiser Standards and Analytical Methods. Quality Manual - Assessment Procedures

Summary of assessment with risks highlighted:

- Information status & prior registrations (New AsureQuality Assessment. MPI non-dairy animal products C31 approved means surfaces rinsed before food re-introduction).
- Food safety (raw material FSANZ & 21CFR listings in table but raw 2 is unfound except for SDS data summarised in the table. Purity complete for main component.
- QA (n/a per low risk and infer from NSF approval). QC specs (Chemical food safety is per raw materials as above. Micro safety control concern/ is not found).
- Instructions –
 - Label (CRC Exoff-1 Cleaner ultimate industrial strength cleaner - safer alternative to toxic cleaners without sacrificing cleaning. Versatile and penetrates grease. & removes soils from metal & concrete & hard surfaces. Used for manufacturing, mining, MRO, food processing, engines, machinery, workshop floors, bilges, sinks, floors, vehicles & many others. Biodegradable, water based non-toxic, non- hazardous, non-flammable, pH balanced & water soluble. Non-abrasive, non-corrosive, non-solvent & safe for use on most surface/ substrates that are washable. Directions at desired dilution with hot or cold water. Test inconspicuous areas. Leave on surfaces 1-2 minutes & heavy soil may need scrubbing. Wipe or rinse off Exoff on food surfaces, thoroughly rinse with potable water. Increase cleaning with hot water. Safe for PET HDPE & PP. Not recommended for polycarbonates (any amines/amide), PVC or Nylon. MPI non-dairy animal products C31 approved means surfaces rinsed before food re-introduction. AsureQuality - . Dilution rates with water - light degreasing at 1/20, heavy degreasing at 1/10, & extreme degreasing at 100%. 5 minutes contact & wipe off with clean cloth. HSNO information read label. Warning keep out of reach of children. May be harmful if swallowed. Causes eye irritation. First aid & emergency number).
 - MSDS (Unfound).
- Side effects (Environment/OSH are per MSDS & EPA NZ system both unfound, & production side effects refer to food safety listings)
- Hygiene efficacy (Is outside scope & formula comparison vs IDF guides).

Contents (This is a simplified report with sections 2-11 replaced by a summary on p1 and in the table in section 1)

0 Information is to be evidential (std 0).	1 Materials safety and residues etc
2 Material (other – function)	3 Quality assurance certificate
4 Purity (or Design, formulation, fabrication and finish).	5 Instructions
6 Freedom from apparent side effects	7 Efficacy or hygiene to meet food safety margins
8 Packaging safety.	9 Summary of submitted information etc
10 Standards/References - front page/may be attached	11 Contacts.
12 Confidential information re design, formulation etc.	13 Covering letter & then 14 Raw material confidential information

Risk Rating (failure/accident)

	Chemical	Microbiological
Incidence	Low	Low
Susceptibility	Low	Low (higher post heat treatment)
Severity	Low	Low
Total	Low	Low (higher post heat treatment)

Evaluation: Note that Standards vs. submission-responses yield compliance status in each of the sections below.

Nature of information

0 Standard: Assurance information is to be evidential/cross-registered/or ex accredited bodies (and approvals may need levels of independence for toxicity and efficacy).

- Information status & prior registrations (New AsureQuality Assessment. MPI non-dairy animal products C31 approved means surfaces rinsed before food re-introduction).

Raw materials:

1 Standard:

Raw materials are to be identified safe: traceably identified, non-toxic, and pure - depending on the level of contact. Raw materials are to be safe at residue levels with safety factors (simplified here eg per cross-registration of USFDA 21 CFR/ ANZF/ EU etc registrations factored for likely equivalence and recognising high 1.5 L milk consumption would have been required by FDA etc – refers to supplier confidential appendix but with identifiers excluded

Response

(CRC Industries) Exoff Food Grade Degreaser And Cleaner (was Exoff-1 Cleaner)H3831 12-04-2017	Registrations column. Scope: NZ checks (NICNAS AICS. FSANZ, US FDA 21 CFR/ NSF, Food Chemicals Codex, EPA NZ, EU, French culinary listings or related data for equivalent safety). NZ background (Animal Products Act, Risk Management Programmes. Detergent & Sanitiser Manufacturer's Code of Practice, Detergent & Sanitiser Standards and Analytical Methods. Quality Manual - Assessment Procedures	Purity column raw purities to be per FSANZ purity wanted (as ingredient etc.) FCC7 2010-2011 with GMP indicators & FSANZ also (require Pb<2, As<1, Heavy metals <40 mg/kg). Purity column.
HACCP vs Instruction summary & exception reporting	Label (CRC Exxoff-1 Cleaner ultimate industrial strength cleaner - safer alternative to toxic cleaners without sacrificing cleaning. Versatile and penetrates grease. & removes soils from metal & concrete & hard surfaces. Used for manufacturing, mining, MRO, food processing, engines, machinery, workshop floors, bilges, sinks, floors, vehicles & many others. Biodegradable, water based non-toxic, non- hazardous, non-flammable, pH balanced & water soluble. Non-abrasive, non-corrosive, non-solvent & safe for use on most surface/ substrates that are washable. Directions at desired dilution with hot or cold water. Test inconspicuous areas. Leave on surfaces 1-2 minutes & heavy soil may need scrubbing. Wipe or rinse off Exxoff on food surfaces, thoroughly rinse with potable water. Increase cleaning with hot water. Safe for PET HDPE & PP. Not recommended for polycarbonates (any amines/amide), PVC or Nylon. MPI non-dairy animal products C31 approved means surfaces rinsed before food re-introduction. AsureQuality - . Dilution rates with water - light degreasing at 1/20, heavy degreasing at 1/10, & extreme degreasing at 100%, 5 minutes contact & wipe off with clean cloth. HSNO information read label. Warning keep out of reach of children. May be harmful if swallowed. Causes eye irritation. First aid & emergency number).	MSDS (Unfound)
HACCP analysis of other aspects	Information status & prior registrations (New AsureQuality Assessment. MPI non-dairy animal products C31 approved means surfaces rinsed before food re-introduction). Food safety (raw material FSANZ & 21CFR listings in table but raw 2 is unfound except for amine concern & similar material has adverse data listed for comparison) . Purity unfound would be helpful for amine component). QA (n/a per low risk and infer from NSF approval). QC specs (Chemical food safety	Side effects (Environment/OSH are per MSDS & EPA NZ system both unfound, & production side effects per food safety listings) Hygiene efficacy (Is outside scope & formula comparison vs IDF guides).

	is per raw materials as above. Micro safety control concern/ is not found)	
Formulation 100% made up of components listed below & FCS contact carryovers per farm model in table		
Raw 1 ubiquitous	Ubiquitous and safe	
Raw 2 emulsifier	Food listings for this and for amine component unfound compared to similar material with safety listings now under review. Raw 2 unfound in NZIoC but CRC says NZIoC100615 04-04-17. NICNAS AICS secondary notifications apply before bringing in to Australia. Amine component of raw 2 has NZIoC HSR000996. & in CCID at 40-40% (lower unfound) flammability, oral toxicity, inhalation toxicity, dermal toxicity, contact sensitisation human target organs and skin & eyes.	SDS (Stepan Warning harmful if swallowed. Causes skin irritation. Causes serious eye irritation. Harmful if inhaled. May cause respiratory irritation. Toxic to aquatic life. Harmful to aquatic life with long lasting effects. Composition active 90-100% & other components below reportable level <1%. LD50 oral rat 550 mg/kg, LD50 dermal rabbit >2000 mg/kg, LC50 inhalation >3551 mg/m3. Not expected to be a skin sensitiser. No data that components over 0.1% are mutagenic or genotoxic. Product is not a carcinogen by IARC, NTP or OSHA). Purity wanted (per column header). Purity found (per SDS above).
Raw 3 alkyl polyether	NICNAS AICS listed w/o concern. EPA NZ listed HSR00xxxxk. USAFDA21CFR178.1010 - FOUND - similar to alpha lauryl-omega-hydroxypolyoxyethylene with an average 8-9 moles of ethylene oxide and an average molecular weight of 400. Per 21CFR178.1010 - for food and milk containers but not as a final rinse. Also similar to alpha alkyl - omega hydroxyl-poly- oxyethylene by condensation of C11-13 straight chain randomly substituted secondary alcohols with an average of 7-20 moles of ethylene oxide. For emulsifiers and or surface active agents for articles for food manufacture. Also compare 21 CFR173.315.	FSANZ Food Standards Code 1.3.3.3 processing aids generally - FOUND.P Side effects are ok per BS5750 and IDF Bull 288 environmental listings. Efficacy is per BS 5750 and IDF 9101, & 9701 listings. Purity wanted (per header connects US FCC 7 entries unfound). Purity found (n/a unfound for this application)
pH & microbiological growth ranges - safety from growth is not clear.	pH growth ranges: B cereus 4.4-9.3, Campylobacter jejuni 4.9-9.0, C botulinum A & B 4.8-8.5 type E 5-8.5, C perfringens 5-8.9, Listeria monocytogenes 4.5-8.0, Salmonella 3.8-9.	Staph aureus 4.3-9.0, vibrio cholerae 6-11, vibrio parahaemolyticus 4.8-9, vibrio vulnificus 5-10, Yersinia enterocolitica 4.4-9.6

Table continued	A formulation % w/w	A formulation % w/w	B formulation use low	C formulation use high	D raw use low (D=A*B)	E raw use high (E=A*C)	F residue low rinsed & drained mg/kg (F=106S/5000)	G residue use-high drained mg/kg (G=106S/300)	H ingestion mg/kg/day use-low & drain & rinse (H=1.5L*F/70kg)	I ingestion mg/kg/day use-high & drain (I=1.5L*G/70kg)
HACCP vs Instruction summary & exception reporting										
HACCP analysis of other aspects										
Formulation 100% made up of components listed below & FCS contact carryovers per farm model in table & there is actually non-contact here	100.0000%	100.00%	5.00000%	100.0000%	5.00000%	100.00000%	10.000	3333.333	0.2143	71.4286
Raw 1 ubiquitous	91.9000%	91.90%	5.00000%	100.0000%	4.59500%	91.90000%	9.190	3063.333	0.1969	65.6429
Raw 2 emulsifier	2.0000%	2.00%	5.00000%	100.0000%	0.10000%	2.00000%	0.200	66.667	0.0043	1.4286
Raw 3 alkyl polyether	5.0000%	5.00%	5.00000%	100.0000%	0.25000%	5.00000%	0.500	166.667	0.0107	3.5714

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Formulation 100% made up of components listed below & FCS contact carryovers per farm model in table & there is actually non-contact here		
Water CAS 7732-18-5 from 91.9% Raw 1 ubiquitous	Ubiquitous and safe	
MET 10-U, N, N-dimethyl-9-decenamide CAS 1346964-77-6 from - 2% Raw 2 emulsifier	Food listings for this and for amine component unfound compared to similar material with safety listings now under review. Raw 2 unfound in NZIoC but CRC says NZIoC100615 04-04-17. NICNAS AICS secondary notifications apply before bringing in to Australia. Amine component of raw 2 has NZIoC HSR000996. & in CCID at 40-40% (lower unfound) flammability, oral toxicity, inhalation toxicity, dermal toxicity, contact sensitisation human target organs and skin & eyes.	SDS (Stepan Warning harmful if swallowed. Causes skin irritation. Causes serious eye irritation. Harmful if inhaled. May cause respiratory irritation. Toxic to aquatic life. Harmful to aquatic life with long lasting effects. Composition active 90-100% & other components below reportable level <1%. LD50 oral rat 550 mg/kg, LD50 dermal rabbit >2000 mg/kg, LC50 inhalation >3551 mg/m3. Not expected to be a skin sensitiser. No data that components over 0.1% are mutagenic or genotoxic. Product is not a carcinogen by IARC, NTP or OSHA). Purity wanted (per column header). Purity found (per SDS above).
Surfactant blend Alcohol C9-11 ethoxylated 6 mol ? CAS 68439-46-3 EPANZ HSR003338 from Huntsman 5% Raw 3 alkyl polyether	NICNAS AICS listed w/o concern. EPA NZ listed HSR00xxxok. USAFDA21CFR178.1010 - FOUND - similar to alpha lauryl-omega-hydroxypolyoxyethylene with an average 8-9 moles of ethylene oxide and an average molecular weight of 400. Per 21CFR178.1010 - for food and milk containers but not as a final rinse. Also similar to alpha alkyl - omega hydroxyl-poly- oxyethylene by condensation of C11-13 straight chain randomly substituted secondary alcohols with an average of 7-20 moles of ethylene oxide. For emulsifiers and or surface active agents for articles for food manufacture. Also compare 21 CFR173.315.	FSANZ Food Standards Code 1.3.3.3 processing aids generally - FOUND.P Side effects are ok per BS5750 and IDF Bull 288 environmental listings. Efficacy is per BS 5750 and IDF 9101, & 9701 listings. Purity wanted (per header connects US FCC 7 entries unfound). Purity found (n/a unfound for this application)
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clear.	C perfringens 5-8.9, Listeria monocytogenes 4.5-8.0, Salmonella 3.8-9,	Yersinia enterocolitica 4.4-9.6
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Australia +61 3 83189014/
& Ruakura Research Centre, Hamilton East,
P O Box 20474 Hamilton.

Dear John Sokolich,

Please find attached the assessment report for any questions or corrections and the invoice and web listing should follow. Thanks for advising the name change and support for non-contact usage.

(CRC Industries) Exoff Food Grade Degreaser And Cleaner (was Exoff-1 Cleaner) H3831 26-09-2017

- Product description: water based cleaner & degreaser
- Product use: for cleaning grease & grime from hard surfaces including metal & concrete
- Status: new factory assessment name amended and label should say non-contact per coco DEA data & has useful SDS on raw 2. Had cost \$300 + GST for 2 hours 18/04/2017. .

"Passed AsureQuality assessment for food/beverage/dairy factory food areas non-food contact surfaces H3831 with conditions". This assessment was prepared by Global Proficiency Ltd using HACCP principles to determine equivalence with food standards listed below. See <http://assessedproducts.asurequality.com/>. This supports food Risk Management Programmes & other endorsements that may apply to this product include MPI regulated farm dairy approval, MPI dairy factory endorsement, MPI regulated non-dairy animal product approvals, EPA HSNO-OSH-environment approval (& previously AQIS).

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