

17/01/2017 H2942

CRC Industries (Aust.) Pty Ltd, 9 Gladstone Rd, Castle Hill,
NSW 2154 Australia, Ph. (02) 98496700 Fax (02) 96894914
info@crcind.com.au

CRC Industries (NZ) Ltd, 10 Highbrook Drive East Tamaki
Auckland

Phone 09 272 2700, fax 09 2749696. Contact John Sokolich email sokolichj@crc.co.nz

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 Smartwasher Fluid SW-3

- Product description: detergent GP / neutral foam (-)
- Product use: food area, incidental food contact

"Passed AsureQuality assessment for food/beverage/dairy factory incidental contact H2942 per 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 incidental food contact.
- Usage /carry-over to food should be 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 17/01/2022).
- The full report is attached for supplier review and verification. The assessment is activated by countersigning.

Prepared by Global Proficiency for AsureQuality Ltd...



Supplier:.....

Date:.....

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 (Prior approvals (NSF registration no 127000 for uses as a general cleaner (A1) on all surfaces in & around food processing areas not intended for direct food contact. A potable water rinse of cleaned surface is required before food reintroduction...& to (use) to not have odour or visible residue - see www.nsfwhitebook.org. NZFSA 17/07 / 2008 C31 similarly for non-dairy animal products).).
- Food safety (raw material FSANZ & 21CFR listings in table. Purity infer from prior approvals n/a per low risk).
- QA (n/a per low risk and infer from NSF approval).
- QC specs (Chemical food safety is per raw materials as above. Micro safety is by low risk from incidental contact & pH may be inside organism growth ranges).
- Instructions –
 - Label previous (SW-3 degreasing solution. AQMD certified, not toxic, flammable, polluting or corrosive. Caution keep out of reach of children. Directions add full strength to the SmartWasher as necessary (then) surfaces must be thoroughly rinsed with potable water). Panels completed for first aid and formulating).
 - MSDS previous (ingredients non-hazardous 100%, Toxicological information says emergency treatment unlikely but got to suit symptoms and dermal non-irritant ocular slight irritant (test data sighted)
- Side effects (Environment/OSH are per MSDS & EPA NZ system, & production side effects clear by food listings and low risk incidental contact)
- Hygiene efficacy (Is outside scope or 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 (Prior approvals (NSF registration no 127000 for uses as a general cleaner (A1) on all surfaces in & around food processing areas not intended for direct food contact. A potable water rinse of cleaned surface is required before food reintroduction...& to (use) to not have odour or visible residue - see www.nsfwhitebook.org. NZFSA 17/07 / 2008 C31 similarly for non-dairy animal products).).

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) CRC Smartwasher Fluid SW-3 H2942 17-01-2017	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 (Formulation detail over-estimates carryover 100x? per the standard farm CIP model)	Label previous (SW-3 degreasing solution. AQMD certified, not toxic, flammable, polluting or corrosive. Caution keep out of reach of children. Directions add full strength to the SmartWasher as necessary (then) surfaces must be thoroughly rinsed with potable water). Panels completed for first aid and formulating).	MSDS previous (ingredients non-hazardous 100%, Toxicological information says emergency treatment unlikely but got to suit symptoms and dermal non-irritant ocular slight irritant (test data sighted)
HACCP analysis of other aspects	Information status & prior registrations (Prior approvals (NSF registration no 127000 for uses as a general cleaner (A1) on all surfaces in & around food processing areas not intended for direct food contact. A potable water rinse of cleaned surface is required before food reintroduction...& to (use) to not have odour or visible residue - see www.nsfwhitebook.org . NZFSA 17/07 / 2008 C31 similarly for non-dairy animal products).). Food safety (raw material FSANZ & 21CFR listings in table. Purity infer from prior approvals n/a per low risk). QA (n/a per low risk and infer from NSF approval). QC specs (Chemical food safety is per raw materials as above. Micro safety is by low risk from incidental contact & pH may be inside organism growth ranges)	Side effects (Environment/OSH are per MSDS & EPA NZ system, & production side effects clear by food listings and low risk incidental contact) Hygiene efficacy (Is outside scope or formula comparison vs IDF guides).
Raw 1 ubiquitous	Ubiquitous & safe	Purity wanted per column header
Raw 2 Base complex	Similar phosphate - USA FDA 21 CFR 173.310, 184.1763, GRAS with GMP. USDA 9 CFR 318.7, 9 CFR 381.147 sufficient for purpose. BATF 21 CFR 240.1051a Used as an alkali, boiler water additive, hog scald agent, pH control, processing aid in black olives, brandy, margarine, tripe, etc. Finished product must be free of chemical residue. Poison by intra-peritoneal route. Moderately toxic by ingestion, Mutagenic data. A corrosive irritant to skin, eyes and mucous membranes. Oral-rat LDLo: 500 mg/kg. FOUND-FSANZ Food Code is not significantly different from entries for processing aids standard for generally permission #1.3.3.3.	Similar phosphate - ERMNZ Approval Number HSR003416 6.1E (oral) Acutely toxic 6.4A Irritating to the eye Side effects/efficacy are ok per the food listing, ERMA scope, MSDS and IDF 9101, Bulletin 288, & BS 5305. on environment & corrosion. Efficacy is according to the food listing above. Purity wanted (see column header). Purity found (unfound unrequired & can infer from NSF & MPI approvals)

Raw 3 Salt	USA FDA 21 CFR 182.1033, 182.6033, GRAS with GMP, USDA 9CFR 318.7. Acidifier, flavouring agent....for beef (cured), fats (poultry), fruits (frozen)....Poison by intravenous route, moderately toxic by subcutaneous and intra-peritoneal routes, mildly toxic by ingestion. Severe eye and moderate skin irritant. Toxicity data -skin-rabbit 500mg/24H MOD, eye-rabbit: 750ug/24H SEV, oral-rat - LD50 - 6730mg/kg: intra-peritoneal-rat LD50: 883mg/kg. FSANZ Food Code 2000 1.3.1. Food additives schedule 2 FOUND for addition to those process/foods w/o exclusions. Acidity regulator found, preparations of food additives - no, baking compounds - no, flavourings - no, renneting enzymes no, liquid milk products no except UHT goats milk, fermented and renneted milk products, condensed & evaporated milk no exclusions,	cream reduced cream and light cream except UHT had no exclusions, cream products-no, dried milks-no(?), cheese/products-no (?), edible oils.. no, ices/creams no, fruits - no, confectionery no, cereals and breads no, meats no, fish no, eggs no, HSNO & environment are in EMANZ scope Approval Number HSR006695 Classification 6.4A Irritating to the eye and with other side effects also per these food listings and IDF Bull 288 & process side effects and efficacy per IDF 9101, BS5305 etc. Purity wanted (per column header & FCC & 99.5-100.5%, Pb <0.5, tridodecylamine <0.1 mg/kg, absorbance <0.52 details, ignition residue M0.05%, water <0.5%). Purity found (unfound unrequired & can infer from NSF & MPI approvals)
Raw 4 non-ionic surfactant.	NICNAS AICS listed w/o concern. EPA NZ listed HSR00xxxx. USAFDA21CFR178.1010 - FOUND - similar to alpha lauryl-omega-hydroxy-polyoxyethylene 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 hydroxy -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 (unfound unrequired & can infer from NSF & MPI approvals)
pH high vs growth of pathogens at ranges here. & vs pH HD/GP margins. IDF guide alkalinity 0.02-0.6%, surfactant 0.001-0.1%, surfactant 0-0.05%, Chlorine 0% or 0.015-0.025%	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

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- Food safety (raw material FSANZ & 21CFR listings in table. Purity infer from prior approvals n/a per low risk).
- **12 The formulation in confidence follows & is not for public circulation**

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Global Proficiency Ltd for AsureQuality Ltd,
3-5 Lillee Cres. Tullamarine Vic 3043,
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. This is a cover letter and not part of the report.

CRC Smartwasher Fluid SW-3

- Product description: detergent GP / neutral foam (-)
- Product use: food area, incidental food contact
- Status: passed renewed factory assessment. Incidental contact is per nature of use and can be updated to indirect contact if requested. PO - . Cost \$250 + GST for 1:40 hours. .

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