

04/03/2015 H2478

Global Proficiency Ltd for AsureQuality Ltd,
Ruakura Research Centre, Hamilton East,
P O Box 20474 Hamilton.

CRC Industries Ltd, 10 Highbrook Drive East Tamaki Auckland
Phone 09 272 2700, fax 09 2749696. Contact John Sokolich
email sokolichj@crc.co.nz

To whom it may concern,

5:56

- Product type: lubricant (cleaner aerosol)
- Product use: for: food areas, incidental contact

"Passed AsureQuality assessment for food/beverage/dairy factory incidental contact" H2478 with conditions.

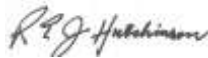
(This assessment was prepared by Global Proficiency Ltd using HACCP principles to determine equivalence with food standards listed below. See <http://assessedproducts.asurequality.com/> This supports food Risk Management Programmes & other endorsements that may apply to this product include MPI regulated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

Conditions: Use for incidental contact - per instructions & GMP - of a minimum quantity as cleaner with incidental contact - residues minimized & avoiding taint.

General conditions:

- The product is to be used according to Manufacturer's Instructions (reflecting the assessment etc), Good Manufacturing Practice (GMP), and applicable legislation.
- Usage and 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), and that food legislation requirements are met..
- The assessment is subject to notification of change (e.g. in formulation, raw materials or instructions) and expires on 19/08/2020.

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 & prior assessments (AsureQuality incidental 5 years, MPI C15 5 years & NSF unsighted).
- Food safety (ingredients 21CFR 178.3570 listed).
- QA/ QC (Unrequired for incidental contact).
- Label previous (CRC Industrial food grade, 5-56 lubricates moving parts, stops squeaks, displaces moisture, attacks rusted parts. AsureQuality approved food beverage dairy, NZFSA approved C15 all animal products except dairy. Flammability warning. NZ company contacts. Caution/children, first aid, caution panels completed. Multipurpose, virtually odourless & tasteless & thin film clings to surfaces, lubricates parts, penetrates rust, inhibits corrosion, displaces moisture, cleans & protects, compatible with paint, plastic & wood. Directions (1) shake can thoroughly, (2) spray light even coating, (3) wipe off excess with cloth, (4) repeat application when necessary, (5) to start flooded engines spray all electricals and leads liberally). MSDS (Considered a hazardous substance according to NZ HSNO legislation. & has bar graph with flammability low1, toxicity & body contact 2 moderate, reactivity 1 low, chronic 2 moderate. GHS classification acute aquatic hazard cat 2, eye irritation cat 2b, respiratory irritation cat 3, & skin corrosion/irritation cat 2. Hazards and precautions are listed. Exposure controls list raws 1, 2, & 3 each with TWA 5 mg/m3 and STEL 10 mg/m3. Toxicity data is all referred to Register of toxic effects of chemical substance except not a small but definite risk of occupational skin cancer occurs in workers exposed to persistent contamination by oils over a period of years. Micro risk may be unlikely per raw chemical processing conditions o& anhydrous formulation
- Side effects (HSNO per EPA NZ, NICNAS AICS, and MSDS. Production effects not expected per food listings and existing use).
- Lubrication efficacy does not impact food safety.

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 & prior assessments (AsureQuality incidental 5 years, MPI C15 5 years & NSF unsighted).

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) 5:56 H2478 04-03-2015	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 Scope: 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 analysis vs instructions	Label previous (CRC Industrial food grade, 5-56 lubricates moving parts, stops squeaks, displaces moisture, attacks rusted parts. AsureQuality approved food beverage dairy, NZFSA approved C15 all animal products except dairy. Flammability warning. NZ company contacts. Caution/children, first aid, caution panels completed. Multipurpose, virtually odourless & tasteless & thin film clings to surfaces, lubricates parts, penetrates rust, inhibits corrosion, displaces moisture, cleans & protects, compatible with paint, plastic & wood. Directions (1) shake can thoroughly, (2) spray light even coating, (3) wipe off excess with cloth, (4) repeat application when necessary, (5) to start flooded engines spray all electricals and leads liberally).	MSDS (Considered a hazardous substance according to NZ HSNO legislation. & has bar graph with flammability low1, toxicity & body contact 2 moderate, reactivity 1 low, chronic 2 moderate. GHS classification acute aquatic hazard cat 2, eye irritation cat 2b, respiratory irritation cat 3, & skin corrosion/irritation cat 2. Hazards and precautions are listed. Exposure controls list raws 1, 2, & 3 each with TWA 5 mg/m3 and STEL 10 mg/m3. Toxicity data is all referred to Register of toxic effects of chemical substance except not a small but definite risk of occupational skin cancer occurs in workers exposed to persistent contamination by oils over a period of years. Micro risk may be unlikely per raw chemical processing conditions o& anhydrous formulation
HACCP analysis vs aspects other than instructions	Information & prior assessments (AsureQuality incidental 5 years, MPI C15 5 years & NSF unsighted). Food safety (ingredients 21CFR 178.3570 listed). QA/ QC (Unrequired for incidental contact).	Side effects (HSNO per EPA NZ, NICNAS AICS, and MSDS. Production effects not expected per food listings and existing use). Lubrication efficacy does not impact food safety.
Raw 1 Ester	NICNAS AICS listed as not assessed. FSANZ FS Code 1.3.1 schedule II ingredient similar (& so processing aid). FDA21CFR ingredient if pure per FCC etc. USA FDA21CFR178.3570	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Raw 2 emulsifier	NICNAS AICS listed as not assessed. Formulation raws 1-3 - Fed Register/vol 64, no 104, June 1, 1999/Rules and regulations) with law office letter 23/04/1999 that although is not yet listed in the 12CFR173.310 at that date this is pending and FDA would not challenge. Currently approved 21CFR73.1001 as colour diluent for those drugs exempt certification. 172.515, 172.525 flavouring and adjuvant, 172.836 as emulsifier, foamer, dough conditioner, disperser, surfactant, wetter, 172.842 as emulsifier, 173.340 de-foamer. FDA calculates that the petitioned use will result in c.a. 0.8 ppm with EDI 2.5 mg/person/day & in the case here it may be 0.3 mg/kg x 1.5 kg milk/160 kg/day = 0.03 mg/kg/day. Two raws may have minute amounts of 1,4-dioxan, and ethylene oxide which are carcinogenic	The ethylene oxide impurity reacts to ethylene glycol in minute quantity. - The agency decided it was reasonably certain to cause no harm (study vs. cancer & safety factor<1.8/1,000,000,000 human life time risk upper bound limit). Because of this low risk no spec was necessary for dioxin. (Ref "Bioassay of 1,4-dioxin for possible carcinogenicity" National Cancer Institute NCI-CC-TR-80, 1978.) Purity unfound & not required at low concentration/contact Side effects Japan permits only silicone as antifoam and may ping this type material near 1 ppm. Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).

	impurities commonly found in chemical products/food additives.	
Raw 3 Hydrocarbon mixture	NICNAS AICS listed as not assessed. 21CFR178.3570 & FSANZ listed incidental contact lubricant	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Raw 4 surfactant	NICNAS AICS listed as not assessed. 21CFR178.3570 & FSANZ unfound but similar found listed for indirect or low level contact. incidental contact lubricant. Data from similar MSDS AMES TEST - NEGATIVE. NO SENSITIZATION REACTION (MAGNUSSON-KLIGMAN TEST) , TWO YEAR FEEDING TESTS (RATS) AND DERMAL TESTING (MICE) DID NOT REVEAL, ANY TOXIC OR CARCINOGENIC EFFECTS. AN IRRITATION	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Raw 5 Solvent paraffinic	NICNAS AICS listed as not assessed. FSANZ FS Code 1.3.3.12 similar only and FDA 21 CFR 178.3570 & direct ingredient use of purified material.	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Raw 6 Hydrocarbon	NICNAS AICS listed as not assessed. USA FDA21CFR178.3570 172.880 limit of 0.02-.2% in bakery products etc	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Raw 7 Propellant	NICNAS AICS listed as not assessed. FSANZ FS Code 1.3.1 (schedule 1 specific foods e.g. beer, and schedule 2 process foods). Example food listing Lewis Food Additives Handbook. (Purpose aerating agent, carbonation, cooling agent, leavening agent, modified atmosphere in pest control, pH control agent, processing aid and propellant. Regulations FDA 21 CFR 184.1240. GRAS with GMP. 21CFR 193.45, USDA 9CFR 318/7, 381.147. Sufficient for purpose. BATF -27 CFR 240.0151. OSHA PEL: TWA 5000 ppm & others similar. Asphyxiant. Experimental reproductive effects. Contact with CO2 snow may cause burns)	Purity wanted (per column header & FCC 2010-11 (99.5% CO2 by volume, carbonyl sulphide <0.5 ppm, Hydrogen sulphide <0.5 ppm v/v, SO2 <5 ppm v/v, water <1 mg/24L, Non-volatile Hydrocarbons <10 mg/kg, Volatile hydrocarbons as methane <0.005% v/v). Purity found (unfound & not critical for low concentration & incidental contact)
Raw 8 antistick	NICNAS AICS listed as not assessed.FDA 21CFR GRAS withy GMP as direct flavouring agent GRAS not in excess for baked goods etc. Use with care vs. taint.	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
microbiological growth control by manufacture, packaging and dry operation of bearings	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 (ingredients 21CFR 178.3570 listed).

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12 The formulation in confidence follows & is not for public circulation

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HACCP analysis of instructions	Label previous (CRC Industrial food grade, 5-56 lubricates moving parts, stops squeaks, displaces moisture, attacks rusted parts. AsureQuality approved food beverage dairy, NZFSA approved C15 all animal products except dairy. Flammability warning. NZ company contacts. Caution/children, first aid, caution panels completed. Multipurpose, virtually odourless & tasteless & thin film clings to surfaces, lubricates parts, penetrates rust, inhibits corrosion, displaces moisture, cleans & protects, compatible with paint, plastic & wood. Directions (1) shake can thoroughly, (2) spray light even coating, (3) wipe off excess with cloth, (4) repeat application when necessary, (5) to start flooded engines spray all electricals and leads liberally).	MSDS (Considered a hazardous substance according to NZ HSNO legislation. & has bar graph with flammability low1, toxicity & body contact 2 moderate, reactivity 1 low, chronic 2 moderate. GHS classification acute aquatic hazard cat 2, eye irritation cat 2b, respiratory irritation cat 3, & skin corrosion/irritation cat 2. Hazards and precautions are listed. Exposure controls list raws 1, 2, & 3 each with TWA 5 mg/m3 and STEL 10 mg/m3. Toxicity data is all referred to Register of toxic effects of chemical substance except not a small but definite risk of occupational skin cancer occurs in workers exposed to persistent contamination by oils over a period of years. Micro risk may be unlikely per raw chemical processing conditions o& anhydrous formulation
HACCP analysis vs aspects other than instructions	Information & prior assessments (AsureQuality incidental 5 years, MPI C15 5 years & NSF unsighted). Food safety (ingredients 21CFR 178.3570 listed). QA/ QC (Unrequired for incidental contact).	Side effects (HSNO per EPA NZ, NICNAS AICS, and MSDS. Production effects not expected per food listings and existing use). Lubrication efficacy does not impact food safety.
Isobutyl stearate CAS 646-13-9 from APS 2% Raw 1 Ester	NICNAS AICS listed as not assessed. FSANZ FS Code 1.3.1 schedule II ingredient similar (& so processing aid). FDA21CFR ingredient if pure per FCC etc. USA FDA21CFR178.3570	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Span 80 Ethoxylated sorbitan monostearate CAS not 1338-43-8? 9005-67-8 from Orica 2.5% Raw 2 emulsifier	NICNAS AICS listed as not assessed. Formulation raws 1-3 - Fed Register/vol 64, no 104, June 1, 1999/Rules and regulations) with law office letter 23/04/1999 that although is not yet listed in the 12CFR173.310 at that date this is pending and FDA would not challenge. Currently approved 21CFR73.1001 as colour diluent for those drugs exempt certification. 172.515, 172.525 flavouring and adjuvant, 172.836 as emulsifier, foamer, dough conditioner, disperser, surfactant, wetter, 172.842 as emulsifier, 173.340 de-foamer. FDA calculates that the petitioned use will result in c.a. 0.8 ppm with EDI 2.5 mg/person/day & in the case here it may be 0.3 mg/kg x 1.5 kg milk/160 kg/day = 0.03 mg/kg/day. Two raws may have minute amounts of 1,4-dioxan, and ethylene oxide which are carcinogenic impurities commonly found in chemical products/food additives.	The ethylene oxide impurity reacts to ethylene glycol in minute quantity. - The agency decided it was reasonably certain to cause no harm (study vs. cancer & safety factor<1.8/1,000,000,000 human life time risk upper bound limit). Because of this low risk no spec was necessary for dioxin. (Ref "Bioassay of 1,4-dioxin for possible carcinogenicity" National Cancer Institute NCI-CC-TR-80, 1978.) Purity unfound & not required at low concentration/contact Side effects Japan permits only silicone as antifoam and may ping this type material near 1 ppm. Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Sectol Mineral oil mixture from Exxon Mobil no CAS 16% Raw 3 Hydrocarbon mixture	NICNAS AICS listed as not assessed. 21CFR178.3570 & FSANZ listed incidental contact lubricant	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Petroleum sulphonate sulphonic acids, petroleum CAS 68608-26-4 from Petrosul 1.5% Raw 4 surfactant	NICNAS AICS listed as not assessed. 21CFR178.3570 & FSANZ unfound but similar found listed for indirect or low level contact. incidental contact lubricant. Data from similar MSDS AMES TEST - NEGATIVE. NO SENSITIZATION REACTION (MAGNUSSON-KLIGMAN TEST) , TWO YEAR FEEDING TESTS (RATS) AND DERMAL TESTING (MICE) DID NOT REVEAL, ANY TOXIC OR CARCINOGENIC EFFECTS. AN IRRITATION	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Paraffin H paraffins petroleum normal CAS 64771-72-8 from Shell Raw 5 Solvent paraffinic	NICNAS AICS listed as not assessed. FSANZ FS Code 1.3.3.12 similar only and FDA 21 CFR 178.3570 & direct ingredient use of purified material.	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Petroleum jelly Petrolatum USP CSA 8009-03-8 from Shell 2% Raw 6 Hydrocarbon	NICNAS AICS listed as not assessed. USA FDA21CFR178.3570 172.880 limit of 0.02-.2% in bakery products etc	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
Carbon Dioxide CAS 124-38-9 from BOC 2.5% Raw 7 Propellant	NICNAS AICS listed as not assessed. FSANZ FS Code 1.3.1 (schedule 1 specific foods e.g. beer, and schedule 2 process foods). Example food listing Lewis Food Additives Handbook. (Purpose aerating agent, carbonation, cooling agent, leavening agent, modified atmosphere in pest control, pH control agent, processing aid and propellant. Regulations FDA 21 CFR 184.1240. GRAS with GMP. 21CFR 193.45, USDA 9CFR 318/7, 381.147. Sufficient for purpose. BATF -27 CFR 240.0151. OSHA PEL: TWA 5000 ppm & others similar. Asphyxiant. Experimental reproductive effects. Contact with CO2 snow may cause	Purity wanted (per column header & FCC 2010-11 (99.5% CO2 by volume, carbonyl sulphide <0.5 ppm, Hydrogen sulphide <0.5 ppm v/v, SO2 <5 ppm v/v, water <1 mg/24L, Non-volatile Hydrocarbons <10 mg/kg, Volatile hydrocarbons as methane <0.005% v/v). Purity found (unfound & not critical for low concentration & incidental contact)

	burns)	
Methyl salicylate CAS 119-36-8 from Orica 1% Raw 8 antistick	NICNAS AICS listed as not assessed.FDA 21CFR GRAS withy GMP as direct flavouring agent GRAS not in excess for baked goods etc. Use with care vs. taint.	Purity wanted (per column header). Purity found (previously unfound & not necessarily required at low concentration & incidental contact).
microbiological growth control by manufacture, packaging and dry operation of bearings	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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Global Proficiency Ltd for AsureQuality Ltd,
Ruakura Research Centre, Hamilton East,
P O Box 20474 Hamilton.

CRC Industries Ltd, 10 Highbrook Drive East Tamaki Auckland
Phone 09 272 2700, fax 09 2749696. Contact John Sokolich
email sokolichj@crc.co.nz

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.

5:56

- Product type: lubricant (cleaner aerosol)
- Product use: for: food areas, incidental contact
- Status: passed AsureQuality factory assessment renewed with formulation previous instructions & w/o NSF & cost \$200 + GST.

"Passed AsureQuality assessment for food/beverage/dairy factory incidental contact" H2478 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: Use for incidental contact - per instructions & GMP - of a minimum quantity as cleaner with incidental contact - residues minimized and avoiding taint.

General conditions:

- The product is to be used according to Manufacturer's Instructions (reflecting the assessment etc), Good Manufacturing Practice (GMP), and applicable legislation.
- Usage and 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), and that food legislation requirements are met..
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