

Global Proficiency Ltd agent for AsureQuality Assessments
<http://assessedproducts.asurequality.com/>
 Or google AsureQuality Assessed Products

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19/05/2011 (replaces: new), ref h2615 (cross-ref n/a), non-regulated, review 19/05/2016 & at any change.

CRC Industries Ltd, 10 Highbrook Drive East Tamaki Auckland Phone 09 272 2700, fax 09 272 2717. Contact John Sokolich email sokolich@crc.co.nz
 cc Tony Rumney, N.Z.F.S.A, PO Box 2835 Wellington (if requested & a regulated farm detergent or sanitiser).

To whom it may concern,

Product: Brakleen,


- Which is: cleaner
- For: brake & clutch linings, automotive parts, industrial machinery, pre-assembly cleaning
- Status: passed AsureQuality assessment factorynew \$180+ GST, rejh #400107 O/N .. (organic, gmo etc status n/a).

"Passed AsureQuality assessment for food/beverage/dairy factory food areas & no potential contact" with conditions. (This assessment was prepared by Global Proficiency Ltd. Other endorsements that may apply to this product include NZFSA regulated farm dairy approval, NZFSA dairy factory endorsement, NZFSA regulated non-dairy animal product approvals, & ERMA HSNO-OSH-environment approval).

- General conditions: use per instructions, with no potential food contact, including vapour (e.g. NZFSA food removed from area) - for uses permitted & see partial references.
- Special conditions: used with care against inhalation.
- Assessment conditions: Subject to notification of change, review within 5 years, inclusion of the approval statement level of contact, and activation by (counter)-signing.

Administration detail:

- ** Asurequality assessment is a non-regulated, voluntary, and evidential certification by the supplier, independently confirmed, without prejudice or guarantee, against checklist standards for food safety as shown in the report attached for your verification. It can be used in food/beverage programme purchasing. It excludes NZFSA meat/fish/game specifically regulated approvals & is a recommendation for their specifically legislated farm dairy detergent/ sanitiser approval.
- *The purpose of this work is to ensure that when used according to instructions products perform without compromising food safety, protect it when this is part of their function, and they should not have other apparent adverse effects for production.
- Data for assessments is held confidential. Determination of compliance with HACCP risk standards is made and uses coded identities linked to confidential appendices & the assessment status may be web listed. The partial list of standards includes: Animal Prods Act, RMP. D & S Manufacturer COP/D&S standards & analytical methods. Quality Manual, Approval Procedures. Also may refer in the concentrations table for food safety to 21CFR, ANZFA..& for side effects & efficacy to other literature (IDF, BS, NZ Cleaning Symposium).
- Formulation NZFSA approved C12 with food removed. Label (Caution keep out of reach of children. For brake fluid, grease, oil (etc) from brake linings, pads, drums, w/o carbon tetrachloride, silicones, CFC113 or methyl chloroform. Non-staining, non-corrosive & leaves no residue. Improved braking and asbestos dust removal. MSDS (GHS classification, acute aquatic toxicity cat 1, acute oral toxicity cat 5, carcinogen cat 2, eye irritation cat 2B, flammable aerosol cat 1, reproductive toxicity cat 1B, respiratory irritation cat 3, and skin corrosion/irritation cat 2. Permitted exposure levels perchoroethylene TWA 335 mg/m3. methylene chloride 174 mg/m3, heptane 1640 mg/m3. carbon dioxide 9000 mg/m3 etc)
- Raw 1 solvent: Probably not food registered. See PEL in MSDS above. ERMENZ web say CAS incorrect
- Raw 2 solvent. Probably not food registered See PEL in MSDS above. ERMENZ register name only found.
- Raw 3 solvent ANZFA 1.3.1 sched II ingredient similar (& so proc aid). FDA21CFR ingredient if pure per FCC etc. See PEL in MSDS above.Approval Number: HSR001164 UN Class: 1206 UN Number: 3; PG II Classification 3.1B Flammable Liquids: high hazard
- Raw 4 propellant FDA21CFR184.1240 direct addition GRAS with GMP. NZFood Regs 84 found. ANZFA 1.3.1.sched 2 ingredient limited. See PEL in MSDS above. Approval Number: HSR001018 UN Class: 1013 UN Number: 2.2

AsureQuality Ltd by Bob Hutchinson Global Proficiency 

Supplier:..... Date:.....

Contents

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 (wants efficacy report added)
Incidence	Low	Low
Susceptibility	Low	Low
Severity	Low	Low
Total	Low	Low

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).

Response/status: information is fair, objective, and complete.

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

(CRC) Brakleen h2615 19-05-2011	Registrations etc column. Animal Products Act, Risk Management Programmes. Detergent & Sanitiser Manufacturer's Code of Practice, Detergent & Sanitiser Standards and Analytical Methods. Quality Manual - Assessment Procedures	Micro safety is per production conditions and anhydrous formulation.	A % this material in formulation
Formulation NZFA approved C12 with food removed. Label (Caution keep out of reach of children. For brake fluid, grease, oil (etc) from brake linings, pads, drums, w/o carbon tetrachloride, silicones, CFC113 or methyl chloroform. Non-staining, non-corrosive & leaves no residue. Improved braking and asbestos dust removal. Application areas similarly. NZFA similarly. Spray (target) liberally, allow to run off, & protect rubber parts. Caution use with adequate ventilation & first aid, misuse & disposal details.	Contains: tetrachlorethylene 350 g/L, & hydrocarbon liquid 450 g/L. Flammable do not use near fire or flame, propellant carbon dioxide. Made by CRC with details). MSDS (GHS classification, acute aquatic toxicity cat 1, acute oral toxicity cat 5, carcinogen cat 2, eye irritation cat 2B, flammable aerosol cat 1, reproductive toxicity cat 1B, respiratory irritation cat 3, and skin corrosion/irritation cat 2. Permitted exposure levels perchloroethylene TWA 335 mg/m3. methylene chloride 174 mg/m3, heptane 1640 mg/m3. carbon dioxide 9000 mg/m3 etc)		100%
Raw 1 solvent	Probably not food registered. See PEL in MSDS above. ERMANZ web say CAS incorrect	Purities n/a for non-contact	30.0 25.0 00% 00%
Raw 2 solvent.	Probably not food registered See PEL in MSDS above. ERMANZ register name only found.	Purities n/a for non-contact	30.0 25.0 00% 00%
Raw 3 solvent	ANZFA 1.3.1 sched II ingredient similar (& so proc aid). FDA21CFR ingredient if pure per FCC etc. See PEL in MSDS above. Approval Number: HSR001164 UN Class: 1206 UN Number: 3; PG II Classification 3.1B Flammable Liquids: high hazard	Purities n/a for non-contact	40.000%
Raw 4 propellant	FDA21CFR184.1240 direct addition GRAS with GMP. NZFood Regs 84 found. ANZFA 1.3.1.sched 2 ingredient limited. See PEL in MSDS above. Approval Number: HSR001018 UN Class: 1013 UN Number: 2.2	Purities n/a for non-contact	5.000%

Compare concentrations in this table with paragraphs below (ANZFA standards in late 2001 may not use defaults)

- USA and NZ defaults around 50 ppb and 100 ppb (NZ 100 for agricultural residues), E. U. default 10 ppb (?).
- and FDA acceptances 10 ppb (limited usage), and 0.5 ppb (wide-spread use)
- Detergents not in excess, drained and rinsed (1/5000x reduction) and sanitisers drained (1/300x reduction) and should be rinsed (QA cling may increase residue from 1/5000 reduction to 1/600 reduction).
- Boilers: 100x evaporative concentration, max 1% carry over (vs. 0.2%), and injection eg 1.5% into cream.
- Coolers: failsafe pressure protection no contact, and max accident 1% seepage/ heat exchange separation from product.
- Lubricants incidental contact has residues minimised & below various limits (eg <10 mg/kg hydrocarbon or greater safety for milk & beverage).

- The product is assessed against standards: Animal Prods Act, Risk Management Programmes. Detergent & Sanitiser Manufacturer's Code of Practice, Detergent & Sanitiser Standards and Analytical Methods. Quality Manual – Approval. Others included by reference include food listings (e.g. 21CFR, ANZFA), side-effects & efficacy (e.g. IDF, BS, NZ Cleaning Symposium etc.).
- Formulation 100%.
 - Food listings/toxicity, purity, and side effects and efficacy refer to raw material listings in the concentrations table.
 - QA & QC & purity also refer sections 3 & 4.
 - Instructions also refer section 5.
 - Safety OSH & environment & side effects also refer section 6.
 - Efficacy also refer section 7.
 - Status overall complies.

2 Standard:

Raw materials should be suitable- e.g. sanitisers for sanitising etc

- Response/status: comply per chemical properties and common use.

3 Standard:

Additives are to be manufactured consistently safe - per quality assurance to ISO 9002 (& labs should be certified to ISO Guide 25). Detergent and Sanitisers should be listed with the Code of Practice Group (see manufacturers parent code).

- Response/status re the standard: n/a for non contact.

4 Standard:

Formulation quality control - continues 3 above.

Raw materials should be controlled at manufacturers stated levels (+/- 5% x level and this can be covered by quality assurance but the manufacturer will have make/QC sheets..). Purity: The target should be taken from the raw materials standards in Food Chemicals Codex (Arsenic, Heavy metals and Foreign Matter).

- Response:
 - Micro safety is according to production conditions, anhydrous formulation and non-contact.
 - Chemical purity is not required for non contact application.
 - Status complies.

Quality assurance of use

5 Label: to provide for quality assurance of use; trace-ability and description including mode of use (per ref 6 method 3.5 a) to be complete and clear (c.f. farms check list below).

- Label instructions are to provide quality assurance of the method of use for efficacy, safety and side effects by addressing key points:
 - Product name •, batch •, expiry • etc
 - Distributors/Manufacturers name and address •
 - The description of the substance e.g. detergent/ sanitizer/ detergent-sanitiser, general purpose/ heavy duty detergent, nature of sanitizer active, level of foaming (low, medium and high), routine or periodic treatment, and compatibility to levels of hardness. (These can be similar to Australian Standards & AQIS). •
 - The description of the type of equipment to be treated •
 - The use instructions concentration, temperature in and out, time/and typical volumes. All the steps in the cleaning routine, the hot temperatures at incoming and dump, permitted cold steps, the acid and alkali routine, and reference to periodic cleaning. They include safe residue minimisation (drainage, & rinse before next milking or air purge etc).
 - Warnings about possible harmful effects and the other regulatory etc requirements should be met but may be outside the food safety scope.
 - Note NZ may use e.g. 10L/cluster, enough solution for re-circulation, 75C initial solutions (or to not damage & dump the pipeline machine at 65C and BMT at >55C).
- Response/status: instructions summarized in section 1 provide equivalent assurance for use.

Performance

6 Standard:

To be free from apparent side effects: inc taint, corrosion, inhibition, insolubility, market, or other effects.

- Response:
 - Environmental effects & OSH are in ERMA scope & described in the MSDS.
 - Production side effects are covered non contact & the MSDS summarised in section 1.
- Status: complies.

7 Standard: Efficacy:

Efficacy: for detergents to clean and sanitisers to sanitise - to complete their part in sanitation systems to minimum food safety standards - and to industry established safety margins according to the particular product/process. This uses laboratory methods. Or it uses product outturn microbiological performance, as well as plant visual or microbiological status.

- Response/status: Efficacy is not expected to impact food safety (but is expected from the chemical properties).

8 Standard: containers/transport to be safe

- Response/status: is accepted according to the history of care.

9 Attachments:

- Application form with formulation, label & MSDS.

10 Standards are listed in the introduction and concentration table and references may be attached to the assessment file.

11 Contacts

- Bob E J Hutchinson PhD, Marion Buckley-Smith PhD for chemicals & contact above address.
- David Hambling, Food Quality Engineer. AsureQuality Limited 31 Norman Hayward Place, Te Rapa, Private Bag 3080 Hamilton, Phone: 07 850 2800 Fax: 07 850 2801.
- Ben Cooper, FQ Engineer, AsureQuality Ltd, 14 Sir William Pickering Drive, Private Bag 4718 Christchurch, Ph (03) 379 4100. Fax (03) 365 6479

12 The formulation in confidence –

(CRC) Brakleen h2615 19-05-2011	Registrations etc column. Animal Products Act, Risk Management Programmes. Detergent & Sanitiser Manufacturer's Code of Practice, Detergent & Sanitiser Standards and Analytical Methods. Quality Manual - Assessment Procedures	Micro safety is per production conditions and anhydrous formulation.	A % this material in formulation
Formulation NZFSA approved C12 with food removed. Label (Caution keep out of reach of children. For brake fluid, grease, oil (etc) from brake linings, pads, drums, w/o carbon tetrachloride, silicones, CFC113 or methyl chloroform. Non-staining, non-corrosive & leaves no residue. Improved braking and asbestos dust removal. Application areas similarly. NZFSA similarly. Spray (target) liberally, allow to run off, & protect rubber parts. Caution use with adequate ventilation & first aid, misuse & disposal details.	Contains: tetrachlorethylene 350 g/L, & hydrocarbon liquid 450 g/L. Flammable do not use near fire or flame, propellant carbon dioxide. Made by CRC with details). MSDS (GHS classification, acute aquatic toxicity cat 1, acute oral toxicity cat 5, carcinogen cat 2, eye irritation cat 2B, flammable aerosol cat 1, reproductive toxicity cat 1B, respiratory irritation cat 3, and skin corrosion/irritation cat 2. Permitted exposure levels perchloroethylene TWA 335 mg/m3. methylene chloride 174 mg/m3, heptane 1640 mg/m3. carbon dioxide 9000 mg/m3 etc)		100%
Tetrachloroethylene CAS 127-18-2 from Dow 25% Raw 1 solvent	Probably not food registered. See PEL in MSDS above. ERMANZ web say CAS incorrect	Purities n/a for non-contact	25.000%
Methylene chloride CAS 75-09-2 from Orica 30% Raw 2 solvent.	Probably not food registered See PEL in MSDS above. ERMANZ register name only found.	Purities n/a for non-contact	30.000%
Heptane CS 142-82-5 from Exxon Mobil 40% Raw 3 solvent	ANZFA 1.3.1 sched II ingredient similar (& so proc aid). FDA21CFR ingredient if pure per FCC etc. See PEL in MSDS above. Approval Number: HSR001164 UN Class: 1206 UN Number: 3; PG II Classification 3.1B Flammable Liquids: high hazard	Purities n/a for non-contact	40.000%
Carbon dioxide CAS 124-38-9 from BOC 5% Raw 4 propellant	FDA21CFR184.1240 direct addition GRAS with GMP. NZFood Regs 84 found. ANZFA 1.3.1.sched 2 ingredient limited. See PEL in MSDS above. Approval Number: HSR001018 UN Class: 1013 UN Number: 2.2	Purities n/a for non-contact	5.000%

Compare concentrations in this table with paragraphs below (ANZFA standards in late 2001 may not use defaults)

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cc Tony Rumney, N.Z.F.S.A, PO Box 2835 Wellington (if requested & a regulated farm detergent or sanitiser).

Dear John Sokolich,

Please find attached your assessment report.

Product: Brakleen,

- Which is: cleaner
- For: brake & clutch linings, automotive parts, industrial machinery, pre-assembly cleaning
- Status: passed AsureQuality assessment factory new \$180.+ GST, rejh #400107 O/N .. (organic, gmo etc status n/a).

"Passed AsureQuality assessment for food/beverage/dairy factory food areas & no potential contact" with conditions. (This assessment was prepared by Global Proficiency Ltd. Other endorsements that may apply to this product include NZFSA regulated farm dairy approval, NZFSA dairy factory endorsement, NZFSA regulated non-dairy animal product approvals, & ERMA HSNO-OSH-environment approval).

- General conditions: use per instructions, with no potential food contact, including vapour (e.g. NZFSA food removed from area) - for uses permitted & see partial references.
- Special conditions: used with care against inhalation.
- Assessment conditions: Subject to notification of change, review within 5 years, inclusion of the approval statement level of contact, and activation by (counter)-signing.

The cost was \$180 + GST, invoice to follow, and please let us know any corrections or questions.



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