

Castle Chemicals Pty Ltd

Cleaning products used in food preparation of manufacturing environments

Food Safety and so called "HACCP certification"

Castle Chemicals manufacture a wide range of cleaning and process chemicals for a diverse industry portfolio. Included in this range are products intended for use in food preparation areas and / or food manufacture / processing.

Castle clients using products in these areas undergo Food Safety Audits by their relevant State Food Authority. These audits consider potential food safety hazards to protect consumers and the general public.

HACCP (Hazard Analysis Critical Control Points) is just one part of food safety / quality systems that literally identifies Hazards and implements measurement of Critical Control Points to ensure due diligence by organisations and businesses involved with food. It is the responsibility of the PCBU (Person Conducting Business or Undertaking) to have a food safety plan in place, identify potential hazards and measure and record any critical control points. The recording of this data then shows they have a plan that is: a) in control b) is well understood and c) that produces data that they can document and use to prove they are meeting their food safety plan.

An important part of Food Safety is contamination and ensuring this cannot occur. Cleaning products provide a method for removal of unwanted soils and sanitising microbiological contamination, but in themselves, are potential sources of contamination of foodstuffs. A Food Safety Auditor will want to be re-assured that cleaning products are effective, but that potential contamination is avoided. This means considering several important considerations:

- 1) Are the products suitable for purpose?
- 2) Are the products being used at the correct manufacturer recommended concentration?
- 3) Are the products being applied in the manufacturers recommended method?
- 4) Are post cleaning procedure being followed (Rinse / No rinse etc)?
- 5) Is post usage testing required prior to re-commissioning of food area? (Micro bio / residual?)
- 6) If any of these areas are considered critical for control, are results being recorded?
- 7) Is the overall cleaning regime achieving desired effect?

A food safety auditor will want to be satisfied that the process is working i.e. achieving a sanitary clean, but also not potentially contaminating the foodstuff in ongoing operations.

As can be seen, issue 1) "Are these chemicals suitable for purpose" is only one small part of an effective cleaning regime.

In formulating products for these applications and recommending how they are applied, Castle Chemicals has to consider all these factors. All raw materials we select must be non toxic in use, including consideration of impurity levels. For these products, we only use "food grade" raw materials with reference to the Codex Alimentarius standards. We provide usage information on our product 'Technical Bulletins' these recommended methods and concentrations have to be either within FSANZ (Food Safety Australia New Zealand) Food Code processing guidelines or 'GRAS (Generally regarded as safe U.S. FDA)'. Technical Bulletins detail methods of application which may be via calibrated dispensing equipment and also subsequent post cleaning strategies. If the customer requires validation testing, we can offer these services, or provide equipment for customer to do the same. If the customer includes these tests in their Food Safety plan as a critical control point, the results can be recorded. These records can be used to review with Castle the overall effectiveness of the cleaning programme.

All this information, including a statement of food safety is included in the Castle Chemicals product 'Technical Bulletin'. Food Safety Auditors should be shown the Technical Bulletin and can consider the information in context, including the 'Food safety statement' this will provide part of the information for them in their assessment of the overall site Food Safety Plan.

Commercial entities that provide so called 'HACCP certification' paperwork for cleaning products may not necessarily have access to manufacturer's raw material and formulation data or any influence on the way a product is used, monitored or controlled. Castle Chemicals provide the Product Technical bulletin detailing not only the 'Food Safety Statement', but also the full details of how to ensure that in use the product is food safe.

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