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QUESTION

Our beverage manufacturing facility is based in the Northeast US. We are in the process of being certified to the BRC Global Standard for Food Safety (issue 8). We had a pre-assessment conducted by a BRC consultant and he raised the concern that we had not proven we had reduced the risk of cleaning chemical residues from food contact surfaces. What does this mean and how can I prove we've addressed it?

ANSWER

In clause 4.11.3, the BRC Standard addresses the need to assure if a cleaning and sanitation process is used to address a specific hazard, both the procedures used and the frequency of the cleaning and sanitation process needs to be proven effective (validated) and the records proving this must be available. A food safety hazard is traditionally classified as one of the following:

- Biological hazard (e.g., a pathogenic microorganism)
- Physical hazard (e.g., metal or plastic pieces which may injure a consumer)
- Chemical hazard (e.g., an allergen or other chemical)

A chemical hazard may include a cleaning or sanitation chemical that is inadvertently introduced into a food product from a food contact surface. This may occur if the cleaning and sanitation activity is not properly controlled, carried out or otherwise fails due to human or mechanical errors. You can prove you have rinsed off the cleaner and/or the sanitizer by using the appropriate test at the right time. Proving this may be a plant decision or required by the chemical manufacturer's label instructions.

Test Methods

1. If you've used a caustic or acid cleaner, you can check the pH of the rinse water. If the pH is below the expected result it may indicate a acidic cleaner residue and if the pH is above the expected result it may indicate caustic cleaner residue.
2. Residual caustic cleaner on a surface can also be detected with a phenolphthalein solution.
3. Conductivity can also be an effective method.

If you choose to rinse off a sanitizer from a food contact surface, or it is required by the chemical manufacturer's label instructions, your chemical product provider should be able to provide a suitable test method. You should contact your provider for their help and recommendations, they likely have a titration test kit you can use for a specific chemical or type of chemical or can provide additional recommendations for laboratory detection techniques.

Don't forget, after you have validated your cleaning and sanitation process you will need to periodically verify it, or prove it's carried out as designed.

UPCOMING TRAINING

EAGAN, MINNESOTA

Sanitation Food Safety Workshop (Customer ONLY)
Advanced HACCP (August 7-8)
Preventive Controls for Human Foods (PCQI) (September 11-13)

CONCORD, NORTH CAROLINA: CONTACT 704-796-2755 DIRECTLY TO REGISTER

Implementing SQF Food Safety Code in Food Manufacturing Operations (August 19-20)
Preventive Controls for Human Foods (PCQI) (August 21-23)
Advanced HACCP (September 23-24)
Preventive Controls for Human Foods (PCQI) (September 25-27)

2020 TRAINING OPPORTUNITIES- Dates TBD

Preventive Controls for Human Foods (PCQI)
Advanced HACCP
Internal Auditing

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DO YOU HAVE A QUESTION?

7/29/2019

[Contact us](#) for more information on food safety management programs and consulting services, inquiries about on-site training at your location for large groups, educational webinars, e-learning modules and other specialized training.

Every day, the Ecolab Technical Customer Service line receives hundreds of calls from customers seeking help on a wide variety of issues including the GFSI recognized programs like BRC Food, SQF, FSSC 22000. [Email us](#) your questions.

[Click here](#) to download past issues of the Food Safety Institute Flash newsletter.



ABOUT THE EXPERT

Dr. Tatiana Lorca manages food safety training programs for Ecolab. She is a registered SQF Trainer, FSMA/PCQI lead instructor and IHA approved HACCP Trainer. Previously, she was the technical manager for the SQF (Safe Quality Food) Institute, a division of the Food Marketing Institute.

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