

13/07/2021 reference H3882

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To whom it may concern,

**Alcofoam**

- Product description: hand treatment, sanitiser, alcohol
- Product use: for hands with incidental food contact

**"Passed AsureQuality assessment for hands, treated, & with no food contact, or gloves must be worn" H3882 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:**

- Used per instructions, legislation, & GMP, for hands, treated, & with no food contact, or gloves must be worn. Carry-over to food should be minimised, or in this case cocoDEA residue must be avoided, to ensure food function or composition are not affected, that residues are within applicable Maximum Residue Limits and that food legislation requirements are met.
- The assessment is subject to notification of change and expires on 13/07/2023.
- The full report is attached for supplier review and verification. The assessment is activated by countersigning & inclusion of assessment precautions / assessment statement / MPI dairy precautions statement.

Prepared by Global Proficiency for AsureQuality Ltd by  
Bob Hutchinson PhD SENIOR DEVELOPMENT SCIENTIST.

*R.G. Hutchinson*

Supplier:.....

Date: 13/7/21

**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 (Renewing AsureQuality Assessment. MPI approved C54 non-dairy animal products. & MPI recognised for dairy processing. HSR002528 cleaning products flammable group.)
- Food safety (Thanks for adding data that USA EPA restrictions exclude this perfluoro surfactant. Distanced by use on hands with incidental food contact. USA EPA & FDA data for the amine show insufficient data for toxicity/carcinogenicity class but make the link to the cocoamide compound raw 2c below. Raw 2c has negative listing & industry & public (wikipedia) concerns. Purity was not found or necessary for hands with incidental contact. Carry-over to food was negligibly small vs limits).
- QA (not yet ISO 9001 sighted ok for non-CIP).
- QC (chemistry as above and micro safety by level of sanitiser - incomplete at revised alcohol %)
- Instructions –
  - Label (Danger. Flammable. Alcofoam. Instant Hand Sanitiser. Directions for use 1 Ensure hands are clean. Apply 1-2 doses to hands from refillable dispenser. Rub thoroughly into all areas of hands until evaporated, no need to rinse. Use per instructions listed. MPI approved C54 non-dairy animal products. & MPI recognised for dairy processing. Emergency Fire details. Hazards 3.1B,6.4A UN1170. Ethanol solution. HSR002528 cleaning products flammable group. Hazards – causes serious eye irritation. Lists for Safety, Fire, Spills & Leaks, First Aid, Do not re-use container unless decontaminated. See SDS. Hygiene Tech contacts).
  - SDS (Hygiene Technologies. Alcofoam. Instant hand sanitiser. EPA HSR002526 cleaning products flammable group. Hazards 3.1B flammable liquid, 6.4A substances irritating to eye. Details Composition (Ethanol 60%-90% w/w, t-Butyl alcohol <1% w/w). Exposure controls Ethanol TWA 1880 mg/m3 & t-butyl alcohol 303 mg/m3). Properties (SG 0.87-0.91/20C flash point 13C etc). Lists. Toxicology (acute is similar plus breathing & skin irritation). Eco-toxicity - aquatic non-hazardous. Disposal list Transport requirements detailed. Regulatory - says not subject to Montreal Stockholm, Rotterdam and Marpol conventions. & says all components listed or exempt NZIoC & EPA 2526 for cleaner flammability)
- Unwanted effects (Per instructions including label, & SDS, HSNO hazards & ingredients incomplete vs AICS / NZIoC / & Cosmetic List margin. Production side effects not expected per food safety above).
- Hygiene efficacy (Efficacy pert alcohol was by formula vs. alcohol reviews various + FDA 21CFR + <http://www.cdc.gov/handhygiene/Guidelines.html> & World Health Organization (WHO). WHO Guidelines on Hand Hygiene in Healthcare (2009) [PDF - 5.07 MB] recognising efficacy of c.a. this % active which is slightly different from instructions (?). Hygiene Tech enclosed Hills efficacy tests10/11/2014 1349203 on a similar formulation))