



Food Contact and Cleaning Products

Tech Talk

This Tech Talk is based on the regulatory framework for food contact with cleaning products in the United States, which may vary from requirements in other countries. Local regulations should always be consulted when evaluating food-contact requirements outside of the U.S.

In general, there are two main categories of cleaning products for areas where food may be processed, prepared, or served: formulated chemical substances and devices or tools such as scouring hand pads. A common question is whether these products are "safe for use in a food environment." Ultimately, it is the end-user's responsibility to determine whether a product is appropriate depending on how they plan to use it, but the information that follows may help in making that determination.

There are a number of agencies and organizations that may have applicable guidelines or standards with regard to the use of cleaning products where there is a potential for food contact. Among them are the Food and Drug Administration (FDA), United States Department of Agriculture (USDA), Environmental Protection Agency (EPA), and the National Sanitation Foundation (NSF). References from these entities should be consulted for more complete detail as appropriate, but portions of their current or historic programs will be discussed here as they relate to frequently asked questions about food contact and cleaning products.

FDA

FDA approval is typically used for ingredients of food, drugs, or cosmetics, and/or ingredients that are reasonably expected to become components of food, drugs, or cosmetics. Cleaning products are not intended to become ingredients in food, drugs or cosmetics, and therefore "FDA approval" does not apply.

Products intended for food-contact must meet the requirements of all food-contact regulations that might apply to that particular application. Most cleaning products are **not** intended to come into direct contact with food, but can still be used on food contact surfaces. With the exception of some products like 3M™ Sanitizer No. 16L and Scotch-Brite™ Quick Clean Griddle Liquid, most cleaners require a rinse of the surface with potable water prior to contact with food to wash away any residual cleaning material or loosened food soil.

There are also some general requirements for labeling, storage, and use of chemical cleaners or sanitizers in the US FDA Food Code, which can be found at this link:

<http://www.fda.gov/Food/FoodSafety/RetailFoodProtection/FoodCode/FoodCode2009/default.htm>

USDA

Historically, the Food Safety and Inspection Services (FSIS), a branch of the United States Department of Agriculture (USDA), used to require meat and poultry facilities to use only non-food compounds and proprietary substances that had been approved under the USDA authorization program (sometimes referred to as "food-grade" products). However, in 1998 this USDA authorization program was discontinued, and the FSIS significantly altered their approach to facility inspections, eliminating the need for USDA product evaluation. This new approach was driven by the established system of Hazard Analysis and Critical Control Point (HACCP) facility operation. More information can be found at this link:

http://nsf.org/business/nonfood_compounds/history.asp?program=NonFoodComReg

Ultimately, it is the end-user's responsibility to determine whether a product is appropriate for use in a food environment, but the information in this Tech Talk may help in making that determination.

NSF

With the elimination of the USDA authorization program, opportunities arose for third-party certifications of those products historically covered by that program. The National Sanitation Foundation is commonly used as a third-party mark on a voluntary basis. As an example, the 3M™ Stainless Steel Cleaner & Polish Aerosol is NSF A7 registered. You will find the reference and NSF registration number on the product label. This registration category,

however, does not indicate that the product is "food grade" or safe for use on food-contact surfaces. NSF A7 category is for metal polishing cleaning products for use on non-food-contact surfaces in food processing establishments. If used on food-contact surfaces, like other cleaning products, the surface must be thoroughly rinsed with potable water after using.

EPA

Chemical sanitizers and other antimicrobials applied to food-contact surfaces must meet the requirements specified in FIFRA (Federal Insecticide, Fungicide and Rodenticide Act) and regulated by US EPA. These products need to go through a registration process before being placed in the market, and should have an EPA Registration Number showing approval under FIFRA regulations. Refer to the link below for more information on FIFRA registered pesticide products:

http://www.epa.gov/oppad001/ad_info.htm

The 3M™ Sanitizer No. 16L is registered with the EPA and is approved as a no-rinse food-contact sanitizer. It is not intended to be used directly on food, but is safe to use on food-contact surfaces when used as directed. Disinfectant products are not intended for use in no-rinse food-contact applications and, like other cleaning products used on food contact surfaces, must be thoroughly rinsed from the surface with potable water after use. When used according to label directions, disinfectant products can be appropriate for use in a food facility.

Summary

Cleaning products, while not typically intended for direct food contact or as a food ingredient, may be used on surfaces that later do have contact with food. In general, that surface should be thoroughly rinsed with potable water after cleaning and prior to use. Some products however, may be appropriate for no-rinse food contact applications, such as 3M™ Sanitizer No. 16L and Scotch-Brite™ Quick Clean Griddle Liquid. The information provided in this Tech Talk, along with the product label directions, can help guide the end-user to appropriate cleaning product choices for applications in areas where food contact might occur.

Notice to Reader

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