



<https://acmsf.food.gov.uk>

Advisory Committee on the Microbiological Safety of Food

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To the organisations on the attached list.

PESTICIDE RESIDUES MAXIMUM RESIDUE LIMITS - POTENTIAL IMPACT ON FOOD SAFETY

I am writing to you on behalf of the Advisory Committee on the Microbiological Safety of Food¹ (ACMSF) a scientific advisory committee that provides the Food Standards Agency (FSA) with independent expert advice on matters relating to the microbiological safety of food.

The FSA has previously drawn to the Committee's attention the issue of changes to maximum residue limits (MRLs) for quaternary ammonium compounds (QACs) and the expected introduction of MRLs for other biocidal actives, which are used as disinfectants/sanitiser in the food industry, as well as chlorate which is a contaminant introduced during the use of chlorine disinfectants. ACMSF at its plenary meetings has been discussing the food safety implications, and industry representatives that have attended these meetings have continued to express concern about the impact of these changes. ACMSF's initial efforts to source sufficient evidence in this area have been unsuccessful.

I have discussed concerns about these issues with Dr Paul Brantom, Chair of the Expert Committee on Pesticide Residues in Food² (PRiF), and in terms of taking this issue forward we agreed there was:

- a need for ACMSF and PRiF to have access to available data on this subject in order to be able to assess the effect of changes occurring in process hygiene control systems

¹ <https://acmsf.food.gov.uk/>

² <https://www.gov.uk/government/groups/expert-committee-on-pesticide-residues-in-food-prif>

- merit in having a joined-up approach to tackle the complexities that have been raised concerning the new rules on QACs and proposed changes for biocides, including chlorine-based disinfectants
- a need for increased pace in addressing consumer safety concerns relating to changes to pesticide residue MRLs.

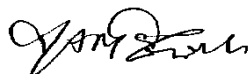
We recognise the importance of liaising with industry in defining the areas that may be at risk and would like to again emphasise that engaging with industry/stakeholders is vital in order to get a clear picture of the areas of concern.

To assist ACMSF and PRiF in assessing the concerns originally raised by sections of the food industry on the implications of changes to the MRLs for QACs, chlorate and biocidal actives, it is essential that we have the necessary evidence to support a wider UK consideration. Therefore, I would be grateful to receive your responses to the following questions:

- If food businesses have stopped using QACs, what alternatives are they using for disinfection and sanitisation?
- In what food related processes are chlorine-based disinfectants used and what alternatives have been considered?
- How are food businesses achieving an acceptable balance between microbiological and chemical safety i.e. what steps do they take to minimise residue levels without compromising microbiological safety?
- What monitoring is being carried out **and/or** additional information being generated, to ensure that changes in biocide usage do not increase the risk of food poisoning?

I appreciate that you will need time to consider these issues and to consult with your members and therefore I would be grateful if you would send your response to the ACMSF Secretariat (acmsf@food.gov.uk) by no later than 30 September 2018.

Yours sincerely



Professor David McDowell
Acting Chair of the ACMSF

British Association for Chemical Specialities
British Frozen Food Federation
British Sandwich Association
British Soft Drinks Association
British Specialist Nutrition Association
British Meat Processors Association
British Retail consortium
Chilled Food Association
European Chemical Industry Council
Food and Drink Federation
Fresh Produce Consortium
Hospital Caterers Association
Nationwide Caterers Association
Provision Trade Association
Provision Trade Federation
Specialist Cheesemakers Association
The University Caterers Association
UK Hospitality
The UK Cleaning Products Industry Association
Wine and Spirit Trade Association

Advises the Food Standards Agency on the Microbiological Safety of Food
Acting Chair: Professor David McDowell