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QUESTION

Our frozen meals manufacturing facility has been successfully certified to the SQF Code for many years. During our last re-certification audit, our auditor issued a minor non-conformity because our sanitizers were being stored in the same secured room as our cleaning chemicals. He cited that pesticides could not be stored alongside cleaning chemicals. I advised the requirement is designed to prevent pest management chemicals from being stored with cleaners and does not apply to sanitizers. He argued that a sanitizer is a pesticide and therefore the nonconformity was valid. Is the auditor correct?

ANSWER

No. This is a miscommunication/misunderstanding by the auditor. Technically under the U.S. Environmental Protection Agency's (EPA) Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) which regulates the use of sanitizers and other chemicals, a sanitizer falls under the broad definition of "pesticide", along with those items someone would use when undertaking pest elimination activities or applying when growing crops. The SQF Code (ref. SQF Food Safety Code for Manufacturing, ed. 8., eff. 02 Jan 2018) requirement actually states:

“11.6.4.4 Pesticides, rodenticides, fumigants and insecticides shall be stored separate from sanitizers and detergents. All chemicals shall be stored in their original containers, or in clearly labelled and suitable secondary containers if allowed by applicable legislation.”

The reason it is worded this way is exactly to prevent auditors from writing up a non-conformity because a sanitizer (which yes technically is regulated as a pesticide in the US under FIFRA) is stored where it should be stored. The requirement is designed to prevent facilities from storing lawn and agricultural and pest control chemicals (also pesticides under FIFRA) within proximity of materials that get applied on food contact surfaces and other surfaces in the facility so someone does not make a mistake and adulterate product.

Your next step is to officially appeal the non-conformity with the auditor and certification body within the timeframe allowed under the SQF Code.

UPCOMING TRAINING

EAGAN, MINNESOTA

Sanitation Food Safety Workshop (Customer ONLY)
Preventive Controls for Human Foods (PCQI) (September 11-13)

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Advanced HACCP (September 23-24)
Preventive Controls for Human Foods (PCQI) (September 25-27)

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Implementing SQF Food Safety Code in Food Manufacturing Operations

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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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