

24 March 2020

Mrs Almut Bitterhof
European Commission
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Dear Mrs Bitterhof,

SCOPAFF REVIEW OF BAC & DDAC MRLs – NEED TO PROTECT FOOD HYGIENE & SAFETY

CLITRAVI, ECFF, Eucolait and SIPA represent European manufacturers supplying the EU's multibillion Euro chilled prepared food market. Many of these foods are ready to eat, to which legal *Listeria monocytogenes* (Lm) limits apply (EU Reg 2073/2005).

We have been following the BAC and DDAC (quaternary ammonium compounds - QACs) MRL dossier for several years, particularly from the perspective of the need for industry to continue to assure food safety and hygiene.

We note that the Commission recognises chlorate arises not from use as a phytochemical but from the necessary use of hygiene biocides with feed, food, water and equipment sanitation to protect the public from pathogens such as Lm.

The same applies to BAC, DDAC and other QACs, which are not used as phytochemicals but as hygiene biocides for food contact and non-food contact surfaces.

QACs are the most effective hygiene biocides in the control of Lm¹. In Europe Lm consistently kills more people, and has the highest fatality rate of the five most common food poisoning microorganisms².

We understand from the notes of the 17-18/2/20 SCOPAFF meeting that there is a proposal to reduce MRLs for BAC and DDAC, with different approaches for produce and POAOs, given levels found in meat products.

For commodities other than raw milk (0.1 mg/kg) we would urge a single MRL (0.05 mg/kg), reflecting necessary hygiene usage to protect public health.

The continued appropriate food hygiene usage of QACs on food contact and non-food contact surfaces must be protected. To repeat, QACs are the most effective hygiene biocides in the control of *Listeria monocytogenes*. Therefore, we recommend that the MRLs are set using a more considered application of the ALARA (as low as reasonably achievable) principle, taking into consideration the continued appropriate usage of QACs and the application of GMP.

We urge you to recognise the importance of QACs to assure food hygiene safety to protect public health, and reflect this in the MRL.

We very much look forward to your response.

Yours sincerely,



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European Chilled Food Fed



DIRK DOBBELAAR
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DR ALICE O'DONOVAN
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Seafood Importers & Processors Alliance

Cc: Mr Klaus Berend, Mr Kris de Smet, Mr Eric Thevenard, Mr Philippe Loopuyt, Mr Frank Andriessen, Mr Paolo Caricato, Mr Stephanos Kirkagaslis

¹ <http://www.sciencedirect.com/science/article/pii/S016816051200267X>

² <http://ecdc.europa.eu/sites/portal/files/documents/zoonoses-%20food-borne-outbreaks-surveillance-2017.pdf>