Foreword

The format and content of this application is based upon the requirements of the Food Standards Australia New Zealand Application Handbook dated 01 August 2011 under sections 22 and 23 of the Food Standards Australia New Zealand Act 1991.

This application is inclusive of references to relevant sections of the FSANZ Application Handbook, is in the form specified in any applicable application guidelines and contains all the information specified in any applicable application guidelines. Relevant content references related to the FSANZ Application Handbook are referenced where applicable in Blue Italic Text.

Executive Summary

This application has been developed and documented to propose an exemption to the prescriptive requirements for hand washing within the FSANZ standards code.

The current requirements for Hand Washing are inclusive of prescriptions for the use of “Warm Water”, which provide no options for the use of technologies such as “electrolysed water” for hand washing, which have gained prominence as effective and appropriate methods for the control of microbiological hazards (including known pathogens). This lack of options negates the significant positive attributes that the use of electrolysed water can bring to Consumers, Food Businesses and Government alike. Specific details of specific Benefits and Costs are defined within this application.

The current structure of requirements for “prescriptive methods” within the FSANZ Food Standards Code displays in-equality regarding the ability for “options” in hand washing scenarios for permanent premises. For example:

- It is possible for a Temporary Food Business to gain an exemption for the use of warm running water for hand washing... Exemptions are not currently available for the use of hand washing water within permanent premises;
- It is possible for a Food Business to use a Cooling Time and Temperature scenario (for Potentially Hazardous Foodstuffs) outside of the FSANZ prescribed time and temperature scenarios... As long as they can validate and verify that the cooling process used will not adversely affect the microbiological safety of the food;
- Requirements for Cleaning and Sanitation are not inclusive of prescriptive requirements for the use of “Warm” (or other tempered water)... They are specified to use heat or chemicals, heat and chemicals, or other processes.

There are “options” available for a number of requirements of the FSANZ Food Standards Code, but not for the use of warm running hand washing water!

The primary differences between the use of “electrolysed water” for hand washing and the current prescriptive requirements of the FSANZ Food Standards Code are that “electrolysed water” is not necessarily warm (as required by the FSANZ Standards Code). The commercial and social benefits of the use of technology such as (non-heated) electrolysed water for hand washing are numerous and have significant sway towards the important tenets of our times including sustainability and environmental protection. Technologies such as the use of (non-heated) “electrolysed water” for hand washing are extensively validated, widely accepted and already utilised within many Food Industry and Health Care sectors in Australia and Internationally.
Based on the supporting evidence supplied as attachments to this submission, it is clear that the use of “warm water” (when using “electrolysed water” as a hand washing option) is not required to achieve an effective reduction in hand-borne micro-organisms. The prescriptive FSANZ requirements for hand washing does not allow for the use of non-heated water for hand washing in permanent premises, which effectively disregards significant benefits such as energy and materials savings.

There are numerous commercial and government owned and operated Australian food business operations already using “alternate” hand washing methods such as “electrolysed water”, which do not utilise warm water. Acknowledgements of the effectiveness of the use of technologies such as electrolysed water for hand washing are documented by an array of Australian Local, State and Federal Government Departments, along with International endorsements.

A summarised listing of prospective benefits of the use of electrolysed water for hand washing is detailed below:

- Enhanced food hygiene standards and compliance outcomes through the use of “less onerous” and “more stable” hand washing applications, such as where electrolysed water is used.
- Reduction in the risk of contamination of foodstuffs by hand washing chemicals where electrolysed water is used.
- Contribution to environmental sustainability through the reduction in volumes of hand washing chemicals being used where electrolysed water is used.
- Reduction in “Carbon Economy” related costs due to prospective negative impacts of transport and manufacturing related carbon generation from the use of hand washing chemicals where electrolysed water is used.
- Reduction in the risk of contamination of foodstuffs by hand washing chemicals where electrolysed water is used.
- Reduction in the use and consequent disposal of chemical packaging and storage materials where electrolysed water is used.
- Significant energy consumption savings electrolysed water is used (these do not require the heating of water to “warm” temperatures to retain efficacy).
- Reduction in trade waste and less chemical contamination within waste water from hand washing chemicals where electrolysed water is used.
- Greater adherence to proper hand washing as the systems dispenses both a cleaning and a sanitising solution (not just warm water which then relies on the user to add soap (if at all) and then to add correct amount of soap to be effective).
- Greater adherence to effective hand wash protocols as auto sensor hand wash dispensers (commonly provided as elements of electrolysed water systems) are time programmed to deliver with hands free operation a continuous stream of firstly illuminated cleaning solution (Blue) immediately, followed by illuminated sanitising solution (Red). The user rubs hands under the continuous streams from the single outlet until the cycle is complete. Current practices require users to "count the seconds" or "read a nursery rhyme" or some such ineffective technique.
- Research and user reports consistently point to electrolysed water being better from an epidemiological perspective with considerable reductions in allergies and skin complaints that often result from frequent chemical use. Less dry and cracked skin and less dermatitis means higher chance of more effective hand washing outcomes.
- Being non-toxic and not scented also means electrolysed water is a much safer alternative in child care scenarios, school canteens and kitchens.
- Delivers major sustainability benefits such as reduced carbon footprint through virtually eliminating factory production of packaged chemicals, vastly reduced transport emissions.
- Virtually eliminates wasteful packaging associated with packaged hand washing chemicals.