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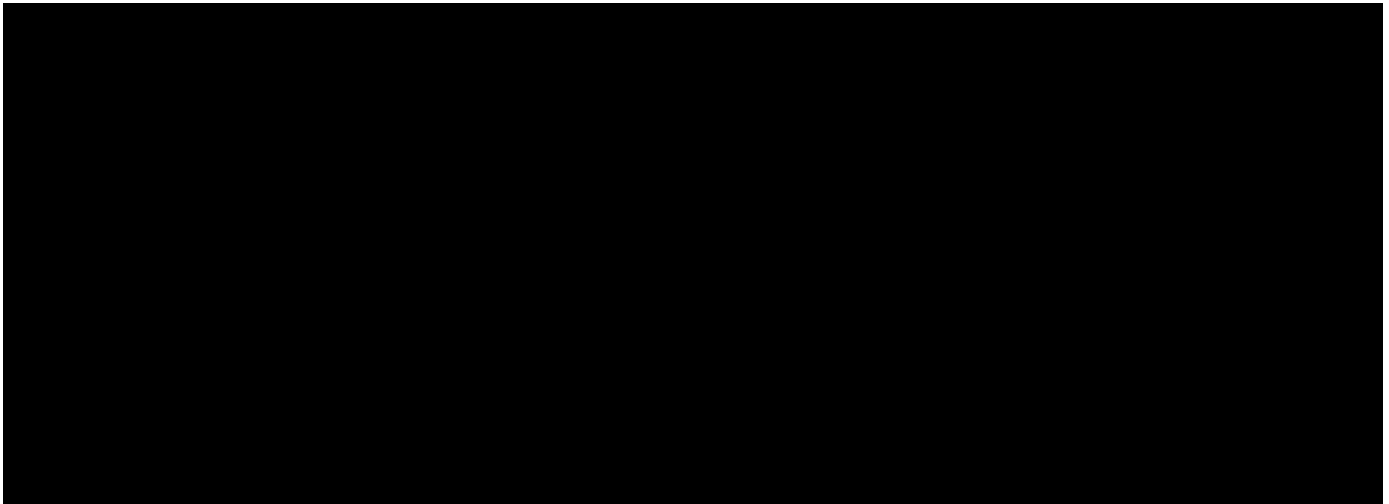
Good afternoon,

We wish to make a submission outlining concerns we have with the proposal to use CPC as a processing aid on poultry. While we are not questioning the efficacy of the product for the application in mind, we have the following concerns –

- 1) Due to the cationic nature of the CPC it is substantive to the surfaces applied and these Quaternary compounds are very stable biocides and persist once applied. The fact that they continue working on the surface of the poultry, even after being “rinsed off” is indisputable. This was the reason that the USDA FSIS instituted a change in the neutraliser used when micro-sampling poultry carcasses, because the normal one used was not adequate to neutralise the CPC which continued killing pathogens after packing and distribution from the processing site – refer attachment titled “Presence of antimicrobial compounds in poultry rinsate samples”. Of note, CPC is currently the only antimicrobial on the USDA FSIS list of Approved Antimicrobials for both On-Line and Off-Line Reprocessing of Poultry that requires a rinse step after application. (This list can be supplied if required but is publicly available information). This must raise the question as to why it requires a rinse if it is being proposed for use as a Processing Aid under FSANZ regulations. FSANZ’s own definition of a Processing Aid is – “to perform a technological purpose in the course of processing” and “does not perform a technological purpose in the food for sale”. Since we know that it continues to kill pathogens on the chicken surface after rinsing and packing and distribution, this does not comply with FSANZ’s definition of “does not perform a technological purpose in the food for sale”. We believe there are two courses of action to address this issue –
  - a. Approve CPC as a Food Additive rather than a Processing Aid, as this is a more accurate representation of its technological purpose.
  - b. If CPC is approved as a Processing Aid, then the Rinsing Step must be defined and mandated as part of the approval – this will have to include volume of water per carcass, spray or immersion technique and contact time, water pressure, water temperature etc. This is to ensure that there is not enough CPC left on the meat surface to continue killing pathogens after the stated rinse step. To not specify these parameters around rinsing, will leave the application of this open to individual interpretation and abuse by operators.
- 2) While this may be outside of the remit of this submission, we believe it is worth mentioning that if CPC is approved as a Processing Aid for poultry, New Zealand operators who use it may unwittingly jeopardise their chances at participating in the export markets mentioned below for the following reasons –
  - a. Poultry for human consumption – New Zealand poultry is free of many of the diseases found in poultry from other countries, which make it an attractive source for value-add poultry products to overseas countries. However, much of the developed world has spent the last 10-20 years moving away from the use of Quaternary ammonium compounds in food, and in a lot of Tier 1 countries, the MRL’s for them are very low. It seems a backward step to look at approving one of these compounds for direct food application and could impact NZ’s fledgling poultry product export business.

- b. Poultry meat used in petfood – New Zealand has a sizeable, growing, and lucrative industry supplying pet food components and finished products to overseas markets, and chicken is commonly used as a component of these, along with other protein sources. Because CPC is formulated with 1.5:1 ratio of Propylene Glycol to CPC, dietary exposure assessments for humans are not adequate for Propylene Glycol if the poultry meat is being supplied for pet-food, as dogs and cats have far lower tolerance to this than humans. Whereas JECFA have established an ADI of up to 25 mg/kg for humans, a mere 9mL/kg can be fatal for dogs (single dose), and it is suspected that it is substantially less than that for cats (American College of Veterinary Pharmacists).
- 3) Again, this maybe outside the remit of this submission, but FSANZ already has approved a number of compounds as Processing Aids which can be used on poultry, which are less expensive, just as effective, do not require capture and recirculation equipment, are widely accepted by overseas export markets, and do not have the rinse requirements or persistence issues that CPC does, so we are wondering what the benefit is of pursuing this CPC registration? The fact that the submitting company (SafeFoods) now has very little market-share with CPC in their own home country of the USA (the worlds largest poultry processing market), so they are having to look overseas in areas like the Middle East and Latin America for growth, speaks volumes about the commercial benefits the market sees in this technology.

Regards



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