

IHO statement: The EGTOP report criteria for the evaluation of products for cleaning and disinfection

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The EU Commission is revising Regulation (EU) 2018/848 on organic production and labelling of organic products. According to Article 24 of the regulation, chemicals for cleaning and disinfecting agents approved for the organic processing of food should be listed in an annex to the Regulation. The Expert Group for Technical Advice on Organic Production (EGTOP) advises the EU Commission in the decision on how to deal with Article 24 and its annex. The EGTOP report of June 2020 now refers to existing European regulations for the first time.

IHO members welcome this development. These European regulations, with their strict regulatory requirements for the whole supply chain, serve the same purpose as Regulation (EU) 2018/848 – that is to protect people and the environment.

The production of ecologically/biologically produced food is highly appreciated and trusted by the public in Germany, and demand is growing. For all areas, both the actual food production (so-called primary production - e.g. the dairy farmer) and the food processing (so-called secondary production - e.g. the cheese dairy), high hygiene and quality standards must be maintained. In this context, it should be noted that many food processing companies use the same production facilities for conventional and organic production processes. To separate these production processes from each other, conversions or even new buildings would be necessary in many places.

- + **A general definition of the areas of application as well as consideration of the local conditions is therefore essential for a legally compliant implementation of Regulation (EU) 2018/848.**

Products and raw materials used in food production and processing are subject to strict regulatory requirements and are adapted to plants and processes. It requires

1. a scientific, risk-based evaluation of raw materials and products, and
2. process engineering understanding of plants and processes

The existing European regulations, such as Regulation (EC) No. 1907/2006 (REACH Regulation), Regulation (EC) No. 1272/2008 (CLP) and in particular Regulation (EU) No. 528/2012 (BPR) are the basis and condition for the 1st point and thus access to the European market.

The manufacturers of the cleaning and disinfecting agents ensure according to the 2nd point the cleaning and disinfection adapted to the process. The Hazard Analysis and Critical Control Point System (HACCP), a preventive management system to ensure food safety, which is internationally recognized as the most effective way to produce safe food, sets a standard here.

- + **In principle, products that are approved according to the BPR should be allowed in all food-producing areas, whether conventional or organic. The same should apply to cleaning products that carry an ecolabel.**
- + **The evaluation of products must be based on a fundamental understanding of chemistry, supported by the regulatory decision of the EU Commission in accordance with the above-mentioned regulations as a strong scientific basis.**
- + **A clarification of the criteria for the evaluation of the substances from point 2.6. in the EGTOP report is highly desirable, as is closer cooperation between the EU legislator and representatives of the professional cleaning and hygiene industry.**

Decisions that could compromise cleanliness and hygiene, or that could even hinder legislative progress and the innovative efforts of companies, should be avoided. In the following, we give examples of raw materials and products and the possible consequences of potential bans:

- + A ban on enzymes is highly problematic: enzymes are naturally occurring proteins that carry out a specific reaction and are completely degradable following the desired reaction.
- + Phosphonates as co-formulants are essential as stabilizers for peracetic acid products. Acetic acid as an organic acid is irreplaceable for disinfection in food production.
- + According to the BPR, biocide products are approved for 10 years. For an approval according to the BPR, comprehensive toxicological and ecotoxicological evaluations are required in addition to the biocidal effectiveness evidence in order to reduce the effects on humans and nature to a minimum. From the manufacturers' point of view, a scientifically extensive expertise has already been compiled and tested in this area.

In the given EGTOP report in this case, only the everyday situation is considered. There is no provision for dealing with situations that require a so-called "emergency regulation".

Conclusion

The topic of ecology, environmental protection and sustainability has arrived in society, but should not be discussed at the expense of hygiene, environmental and consumer protection. It is important to consider the correct application of the products as well as their application concentration - hygiene is a process, not a product.