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Health Products
and Food Branch

Direction générale des produits
de santé et des aliments

Bureau of Chemical Safety
Food Directorate, Health Canada
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May 11, 2015

Our file: IS15012601

Teri Jenner
Manager, Registration Services
Dell Tech Laboratories Ltd.
UWO Research Park
100 Collip Circle, Suite 220
London, ON N6G 4X8

Dear Ms. Jenner:

RE: Chlorine generated by GenEon InstaFlow and GenEon (Trio) on-site generators

This is in reference to your e-mail of January 26, 2015, seeking our comments on the acceptability of chlorine solutions generated by GenEon Instaflow or GenEon (Trio) on-site generators for use as cleaners/sanitizers on food contact surfaces in food processing establishments on behalf of GenEon Technologies Inc.

GenEon Instaflow and GenEon (Trio) are on-site generators that use electrolysis to produce ready-to-use chlorine solutions up to 200 ppm available chlorine for cleaning/sanitizing food contact surfaces in food processing establishments.

Please note that we do not provide an opinion on devices *per se* used in food processing establishments.

Based on the information submitted, we see no reason to object to the use of the **chlorine solutions** produced by GenEon Instaflow or GenEon (Trio) on-site generators for cleaning/sanitizing food contact surfaces without a potable water rinse in food processing establishments, provided that:

- a) GenEon Instaflow and GenEon (Trio) on-site generators are installed, applied by qualified personnel and used, as directed by the manufacturer of the devices;
- b) the food contact surfaces have been previously cleaned and rinsed with potable water prior to sanitizing;
- c) the concentration of available **chlorine will not exceed 200 ppm**, as stated on the label;
- d) the surfaces are hard and non-porous in nature and are thoroughly drained or dry with a clean cloth or towel prior to re-use; and

- e) prior to application (spraying) of the chlorine solution in food handling areas, all food should either be removed from the vicinity or otherwise protected from the spray.

You submitted labels for **GenEon Heavy Duty Cleaner/Degreaser, Glass & General Purpose Cleaner and GenEon Sanitizer/Cleaner** used with GenEon (Trio). We recommend the statement “*For Institutional and Industrial Use Only*” to be replaced by a food plant use statement such as “For Food Plant and Other Industrial Use Only”, and a potable water rinse statement after treatment to be added to the labels for GenEon Heavy Duty Cleaner/Degreaser and Glass & General Purpose Cleaner, as they are used as cleaners. Other than that, the submitted labels are deemed to be acceptable for their use as cleaners/sanitizers on food contact surfaces in food processing establishments.

The submitted label for **GenEon Sanitizer/Cleaner** for use of the chlorine solution as a sanitizer/cleaner contains microbiological claim “*Kills 99.999% of harmful germs*”. Please note that the review conducted by this Bureau relating to the use of such products in food processing establishments has a food safety focus only, and this letter does not provide an opinion on the efficacy against microorganisms, nor does it address the acceptability of this product and its use with respect to occupational health and safety, which, in general, is subject to provincial and territorial oversight. It is the responsibility of the seller and user of this product to ensure that other safety related aspects (occupational health safety, etc.) are appropriately addressed.

We trust that the foregoing will be of use to you.

Yours truly,



Elena Emelianova, Ph.D.
Scientific Evaluator
Food Packaging Materials and
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