



CCOF

Organic Certification

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Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-15-0085; NOP-15-16
Re: Hypochlorous Acid petition for use in Crops, Handling, and Livestock

April 13, 2016

Ms. Michelle Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the petition to classify hypochlorous acid as a synthetic and add it to the National List for use in organic crops, handling, and livestock as a chlorine material.

CCOF (California Certified Organic Farmers) is a nonprofit organization founded in 1973 that advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. CCOF is based in Santa Cruz, California, and represents more than 3,000 certified organic members in 42 states and three countries.

CCOF supports the three listing motions which would add hypochlorous acid to §205.601 (a) (2), §205.603 (a) (7), and §205.605 (b). These materials appear to represent a less toxic, more environmentally friendly, and superior option in addition to existing chlorine allowances. CCOF sees these materials as a positive step forward. Supporting this petition will reduce confusion in certification. CCOF is not aware of any meaningful rationale for not listing the material.

When chlorine materials were first considered by the NOSB in 1995, the most commonly available forms of chlorine were the three materials listed as chlorine materials in §205.601 (a) (2), §205.603 (a) (7), and §205.605 (b). Since then, the process of creating hypochlorous acid by sending an electrical current through water that contains salt (sodium chloride) has become more widespread in the United States. The electrolyzing procedure splits the sodium chloride into chloride ions into hypochlorous acid--the active ingredient in "electrolyzed water"--and the sodium ions into sodium hydroxide. Both products are "powerful yet nontoxic cleaning agents."

As CCOF noted in the comment *Re: NOSB Handling Subcommittee, Sunset 2017 Review Summary, Handling Substances to Retain on the National List, B. Handling Substances §205.605(b)* submitted to the NOSB April 7, 2015, hypochlorous acid is inexpensive, non-toxic, and is even more effective than the NOP-approved chlorine materials in its disinfectant properties. CCOF cited an article in Food Safety Magazine which notes that using electrolyzed water reduces the use of harsher chemicals and urges regulators to embrace the technology (Powitz 2010). Thus, CCOF supports the three listing motions which would add hypochlorous acid to §205.601 (a) (2), §205.603 (a) (7), and §205.605 (b).



Thank you for taking the time to review our information. Please contact us if you would like further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC

Citation: Powitz, R. W. 2010. Activated and hydrolyzed water: a brief review of a new generation of cleaners and sanitizing agents. Food Safety Magazine August/September 2010. Online at <http://www.foodsafetymagazine.com/magazine-archive1/augustseptember-2010/activated-and-electrolyzed-water-a-brief-review-of-a-new-generation-of-cleaners-and-sanitizing-agents/>

