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## Policy Memorandum

**To:** Accredited Certifying Agents, State Organic Programs, and Interested Parties

**From:** Miles V. McEvoy, Deputy Administrator

**Subject:** Electrolyzed Water

**Date:** September 11, 2015

This memorandum updates the status of electrolyzed water under the U.S. Department of Agriculture (USDA) organic regulations at 7 CFR Part 205. The memorandum clarifies that electrolyzed water is a type of chlorine material that is allowed in organic production and handling. This memorandum replaces PM 14-3.

### Issue:

On June 9, 2014, the National Organic Program (NOP) published a policy memorandum (PM 14-3) on the status of electrolyzed water under the U.S. Department of Agriculture (USDA) organic regulations at 7 CFR Part 205. Following the release of PM 14-3, stakeholders provided additional technical and regulatory information on electrolyzed water to the NOP.

Chlorine materials are allowed to be used in organic production and handling. The National Organic Program (NOP) Handbook includes guidance (NOP 5026) *The Use of Chlorine Materials in Organic Production and Handling*. This guidance clarifies the allowable uses of chlorine products under the USDA organic regulations.

Chlorine materials are included on the National List of Allowed and Prohibited Substances (National List). In water, chlorine materials such as calcium and sodium hypochlorite form an equilibrium of related chlorine species, including hypochlorous acid (HOCl) and hypochlorite (ClO<sup>-</sup>). Similar chlorine species are formed in the generation of electrolyzed water. Accordingly, the NOP considers hypochlorous acid generated by electrolyzed water to be an allowable type of chlorine material.

If you have any questions regarding this memorandum, please contact Lisa M. Brines, National List Manager, at (202) 720-3252 or [lisa.brines@ams.usda.gov](mailto:lisa.brines@ams.usda.gov).

### References:

#### **Organic Foods Production Act of 1990, as amended**

7 U.S.C. § 6517 National List



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## USDA Organic Regulations ([7 CFR Part 205](#))

7 CFR § 205.2 Terms defined.

*Allowed synthetic.* A substance that is included on the National List of synthetic substances allowed for use in organic production or handling.

7 CFR § 205.601 Synthetic substances allowed for use in organic crop production.

7 CFR § 205.603 Synthetic substances allowed for use in organic livestock production.

7 CFR § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

## Other Laws and Regulations

Safe Drinking Water Act of 1974 ([40 CFR Part 142](#))

## NOP Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations

NOP 5026 The Use of Chlorine Materials in Organic Production and Handling

PM 11-4 Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations

## Document Control:

This Policy Memo supersedes NOP Policy Memo 14-3, Electrolyzed Water, dated June 9, 2014, which is now obsolete.