



Bureau of Chemical Safety  
Food Directorate, Health Canada  
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October 30, 2023

Our file: IP21080901  
X-ref: IS21050401

Keith Tennant  
Sanera Canada  
[ktt@saneracanada.com](mailto:ktt@saneracanada.com)

Dear Mr. Tennant,

**RE: Hypochlorous acid (200 ppm)**

This is in reference to your e-mail of September 12, 2023, wherein you asked us to revised our letter of no objection on the subject product for use as a sanitizer without a potable water rinse in food processing establishments.

The subject sanitizer is an aqueous solution of *hypochlorous acid* produced through electrolysis from sodium chloride and water by the equipment manufactured by *Envirolyte Industries & Radical Waters Inc.* The solution will be diluted to produce a maximum concentration of 200 ppm of hypochlorous acid for use on food contact surfaces in food processing establishments.

**Re: Food Contact Surfaces Sanitizing**

Based on the information submitted, we have no objection to the use of active chlorine solution for sanitation procedure of food contact equipment and surfaces in food processing establishments, provided that:

- a) the equipment is installed, applied by qualified personnel and used, as directed by the manufacturer of the device;
- b) prior to sanitizing, the food contact surfaces have been previously rinsed with potable water;
- c) the concentration of available chlorine will **not exceed 200 ppm** that should be stated on the label with the proper dilution factor to reach this concentration;
- d) prior to application (spraying) of the solutions in food handling areas, all food should either be removed from the vicinity or otherwise protected; and
- e) the surfaces are hard and non-porous in nature and are thoroughly drained prior to re-use.

However, if the limitation as stated in c) above is exceeded, then a final rinse with potable water is required for surfaces with direct food contact.

It should be noted that this review relating to the use of the subject solution of hypochlorous acid as a sanitizer on food contact surfaces in food processing establishments has a *food safety focus only*. It is the responsibility of the

seller and user of such products to ensure that other safety related aspects (e.g. occupational health safety) are appropriately addressed.

**Re: For use as a disinfectant**

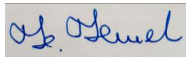
If this aqueous solution of hypochlorous acid produced through electrolysis by the equipment manufactured by Envirolyte Industries & Radical Waters Inc. is intended to be used as a disinfectant in food processing and manufacture and having therapeutic effect (preventing or controlling diseases), is considered to be a drug. . Such application requires a Drug Identification Number (DIN) registration that is under consideration of the Natural and Non-Prescription Health Products Directorate (NNHPD) of Health Canada. General inquiries regarding the Product Licensing Process may be directed to the Natural Health Products and Non-prescription Branch by email at [hc.nhpd-dpsnso.sc@canada.ca](mailto:hc.nhpd-dpsnso.sc@canada.ca).

For more information on disinfectant drugs guidelines, you can visit the following website at <https://www.canada.ca/en/health-canada/services/drugs-health-products/drug-products/applications-submissions/guidance-documents/disinfectants.html>.

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

Yours truly,

X



Signed by: Emelianova, E

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