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Brief Clarification on Sanitizer Use and 100% Organic Status

You may recall the client notification posted on August 28, 2007, regarding the use of sanitizers in direct contact with organic products and the affect that this will have on the 100% Organic claim. We realize that this notification may have caused some confusion among producers and handlers and so we offer the following clarification.

There are several ways in which sanitizers and antimicrobials are used in post harvest handling and food processing. Below is a summary of how the use of a sanitizer/antimicrobial will or will not affect the 100% Organic status of an agricultural product:

1. NOP-approved sanitizers used on farm or in post harvest facilities to wash and sanitize fruits and vegetables to be sold in their raw form will **NOT** affect the 100% Organic status of the agricultural product. Sanitizers used in this way fall under EPA jurisdiction; therefore, the use of these sanitizers are not considered to be food additives or processing aids.
2. NOP-approved no-rinse sanitizers used on post harvest handling equipment or food contact surfaces, including milking equipment (CIP lines or bulk tanks, etc.,) or in milk haul-tankers, will **NOT** affect the 100% Organic status of the agricultural product.
3. NOP-approved no-rinse sanitizers used on **food processing equipment or food contact surface** in food manufacturing operations will **NOT** affect the 100% Organic status of the agricultural product. Sanitizers used on equipment are deemed by the FDA as 'indirect food additives' and are not considered ingredients or processing aids in the product being handled on such equipment.
4. A NOP-approved sanitizer (referred to by the FDA for this use as an "antimicrobial") used to **wash/disinfect** meat carcasses or fruits and vegetables that are **NOT** raw agricultural commodities* **DOES** affect the 100% Organic status of the agricultural product. Antimicrobials used in this way are considered food additives (e.g., processing aids) under the FDA and NOP.

We hope that this clarifies the issue but please contact your Certification Project Manager if you have any questions or concerns.

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1. * The FDA defines a raw agricultural commodity as: "any food in its raw or natural state, including all fruits that are washed, colored, or otherwise treated in their unpeeled natural form prior to marketing." 21 U.S.C. 321 (r)