



TO: Whom It May Concern

FROM: CH<sub>2</sub>O, Inc.

DATE: January 1, 2026 to December 31, 2026

RE: Product Guarantee for Chlorine Dioxide and Acidified Sodium Chlorite Precursors and Gluten, GMO & Allergen Statement

Title 21 of the Code of Federal Regulations (CFR) Part 173.300 and 173.325, govern the use of chlorine dioxide and acidified sodium chlorite in various food applications; Table 1 (next page) is an outline of the regulations with respect to fruits and vegetables.

CH<sub>2</sub>O, Inc. manufactures several sodium chlorite products and GRAS acid products that are acceptable to use in accordance with the applications referenced in Table 1. The following is a list of those products.

**CH<sub>2</sub>O Inc.**  
**Sodium Chlorite Products:**

Aqua Clear 15  
Clean Finish  
Freeze Fresh 7.5  
Freeze Fresh 15  
IVR-SAN 7.5

**CH<sub>2</sub>O Inc.**  
**GRAS Acid Products:**

Color Guard  
Activator CH, Adjuvant CH  
Activator DW  
Activator H, Adjuvant H  
Adjuvant HW

We hereby certify that the products listed above, as manufactured by CH<sub>2</sub>O, Inc. are free from undesirable microorganisms and will be safe and adequate under their intended conditions of use.

The use of CH<sub>2</sub>O, Inc. products for generating acidified sodium chlorite and chlorine dioxide shall be conducted in a manner that protects against contamination of food, food contact surfaces, and food-packaging materials, as well within the parameters of all labeling requirements.

CH<sub>2</sub>O, Inc. products used for generating acidified sodium chlorite and chlorine dioxide do not contain gluten (wheat, rye, or barley), genetically modified organisms (GMOs) or the following allergens and their derivatives:

Peanuts  
Eggs  
Fish

Tree nuts  
Milk  
Soybeans

Wheat  
Shellfish  
Sesame

Refer to the product bulletin and safety data sheets for your products for additional information. Contact your CH<sub>2</sub>O field representative for more detailed information with respect to regulatory issues.



## TABLE 1

Application	Specific Additive and Reference	Product Usage	Use Instruction	Limit
Fruits and vegetables that are not raw agricultural commodities (fresh cut/peeled)	Chlorine Dioxide  FDA: 21 CFR 173.300	1. Sodium chlorite plus chlorine gas or mixture of sodium hypochlorite and hydrochloric acid. 2. Sodium chlorate plus hydrogen peroxide plus sulfuric acid. 3. Electrolysis of sodium chlorite.	Followed by potable water rinse or blanching, cooking, or canning	Not to exceed 3 ppm residual ClO <sub>2</sub>
Raw agricultural commodities	Acidified Sodium Chlorite  FDA: 21 CFR 173.325	Sodium chlorite solution plus GRAS acid	Dip or spray. Potable water rinse, or blanching, cooking, or canning	Chlorite concentrations of 500-1,200 ppm plus GRAS acid to pH 2.3-2.9
Water applied to processed fruits, and processed root, tuber, bulb, legume, fruiting, and cucurbit vegetables	Acidified Sodium Chlorite  FDA: 21 CFR 173.325	Sodium chlorite solution plus GRAS acid	Spray or dip, followed by potable water rinse and 24 hour holding period prior to consumption	Sodium chlorite concentrations 500-1,200 ppm plus GRAS acid to pH 2.3-2.9
Organic Applications	Chlorine Dioxide  7 CFR 205.601(a)	(a) As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems (2) Chlorine materials-Except that residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Act. (ii) Chlorine dioxide Crops Committee Recommendation March 3, 2011: Relist chlorine materials (calcium hypochlorite, chlorine dioxide, and sodium hypochlorite). Residual chlorine levels in the water in direct crop contact or as water from cleaning irrigation systems applied to soil should not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act. Chlorine products may be used up to maximum labeled rates for disinfecting and sanitizing equipment or tools.	National Organic Standards  National List Citation	MRDL: As Cl <sub>2</sub> : 4 mg/L  Chlorine Dioxide 0.8 mg/L or 800 ppb  MCL for by-product: Chlorite 1.0 mg/L