



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Office of Policy, Program, and
Education Development

Washington, D.C.
20250

Jessica Pate
Electric Aquagenics Unlimited, Inc.
1464 West 40 South
Suite 200
Lindon, UT 84042

OCT 27 2004

Dear Ms. Pate:

I am responding to your letter of September 8, 2004, regarding the use of a 0.05 percent sodium hydroxide solution, generated during the production of electrolytically generated hypochlorous acid, for application to poultry carcasses immediately after removal of the feathers and prior to evisceration. During a telephone conversation with this office on October 6, 2004, you stated that the reason for using the sodium hydroxide solution at this point was to minimize fecal material from adhering to the carcasses during the evisceration process. You are requesting a regulatory interpretation as to whether this use of sodium hydroxide would be consistent with the definition of a processing aid and, therefore, not require labeling.

The process, as described in previous correspondence with this office, involves subjecting a saline solution to electrolysis, followed by filtration through a semi-permeable membrane to separate the sodium ions from the chlorine ions. The chlorine ions are used to generate hypochlorous acid whereas sodium hydroxide is generated from the solution containing the sodium ions.

Sodium hydroxide is acceptable for use as a poultry scalding agent for de-feathering poultry carcasses (viz., 9 CFR, Section 424.21(c)) at a level sufficient for purpose. Poultry scalding agents are removed by subsequent cleaning operations and are considered to be processing aids that do not require labeling.

We would not have any objection to the use of this dilute sodium hydroxide solution being applied to poultry carcasses immediately after de-feathering and prior to evisceration because, like the poultry scald agents, the sodium hydroxide would be removed by subsequent carcass cleaning operations. We would consider this particular use of sodium hydroxide to be consistent with FDA's definition of a processing aid (viz., 21 CFR, Section 101.100(a)(3)(ii)) and, therefore, not subject to labeling.

If you have any questions, please contact Mr. Bill Jones, Chemist, or me at Area Code (202) 205-0279.

Sincerely,

Robert C. Post, Ph.D., Director
Labeling and Consumer Protection Staff

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BY: JkPate EAU