

## The Use of Chlorine Materials in OCal Production

### 1. Purpose

This guidance provides clarification regarding the use of chlorine materials in OCal production.

### 2. OCal Regulations, Title 3 California Code of Regulations (3 CCR)

3 CCR § 10000. Definitions.

3 CCR § 10105. Allowed and prohibited substances and methods in OCal production.

### 3. Policy

Residual chlorine levels in water in direct contact with OCal products shall not exceed the maximum residual disinfectant limit under California Code of Regulations, title 22, § 64533.5 and the Safe Drinking Water Act (collectively, SDWA). To demonstrate compliance with the OCal regulations regarding chlorine, certified operators should monitor the chlorine level at the point where the water last contacts the OCal product in direct applications. The operation's OCal system plan (OSP), should contain a description of the operation's monitoring procedure. Certifying agents should review and verify records used by certified operations to demonstrate compliance during the operation's annual inspection.

#### 3.1. Cultivators

- a. Residual chlorine levels in water that's in direct contact with cannabis (when used pre-harvest) or as water from cleaning irrigation systems applied to soil should not exceed the maximum residual disinfectant level under the SDWA (currently 4mg/L expressed as Cl<sub>2</sub>).
- b. Chlorine products may be used up to maximum labeled rates for disinfecting and sanitizing equipment or tools. No intervening event is necessary before equipment is used in contact with crops.

#### 3.2. Distributors

- a. Chlorine materials may be used up to maximum-labeled rates for disinfecting and sanitizing cannabis contact surfaces. Rinsing is not required unless mandated by the label use directions.
- b. Water used in direct post-harvest cannabis contact is permitted to contain chlorine materials at levels approved by the Food and Drug Administration or the Environmental Protection Agency for such purpose.
  1. Rinsing with potable water that does not exceed the maximum residual disinfectant level for the chlorine material under the SDWA must immediately follow this permitted use.
  2. Certified operators should monitor the chlorine level of the final rinse water, the point at which the water last contacts the product. The level of chlorine in the final rinse water must meet limits as set forth by the SDWA.

#### **4. References**

##### **California Code of Regulations (CCR)**

22 CCR § 64533.5. Maximum Residual Disinfectant Levels.

##### **Code of Federal Regulations (CFR)**

7 CFR § 205.601. Synthetic Substances Allowed For Use in Organic Crop Production.

40 CFR § 141.2. Definitions. “Maximum residual disinfectant level” means the highest level of a disinfectant allowed in drinking water.

40 CFR Part 142. National Primary Drinking Water Regulations Implementation.

##### **United States Code (USC)**

42 USC § 300f (4) (B) (III). Authorizes national primary drinking water regulations/Safe Drinking Water Act.

##### **National Organic Standards Board (NOSB) Recommendations – Background**

November 1995 NOSB recommendation on the use of chlorine materials in organic production.

May 2003 NOSB recommendation on the use of chlorine materials in organic production.