

To: Agricultural Commissioners Subject: BioDox™ Compliance

Date: January 15, 2023

BioCentric Solutions would like to thank you for your review of our recently released AQUEOUS chlorine dioxide product, BioDox™. Our team at BioCentric Solutions that created BioDox has years of experience creating, manufacturing, and marketing proprietary solutions to the global market that are safe, environmentally friendly, and compliant.

Scientific studies have shown BioDox to be extremely effective at controlling viruses, bacteria, and mold. However, unlike other products, BioDox is not harmful to the user or the environment and has the lowest possible toxicity ratings from the EPA as well as the FDA and OSHA.¹ The BioDox formulation DOES fall under the class of minimum risk pesticides which include this "family" of chlorites. Therefore, multiple applications in the agricultural community exist from replacing sulfur treatments to washing fruits, vegetables, and other produce.

\*\*\*\*This is *not* to be confused with *chlorine gas* which is *not* an exempt product and does fall under all regulatory registrations and testing requirements set forth by the U.S. EPA, FDA, and OSHA.<sup>2</sup>

Title 21 of the U.S. Food and Drug Administration defines that chlorine dioxide is approved in an aqueous form to be used as a secondary direct food additive permitted for human consumption under specific usage conditions and is a Generally Regarded as Safe (GRAS) product. <sup>2</sup>

In our ongoing effort to comply with all regulations, we reached out to the DPRR (Department of Pesticide Registration and Reporting) for California. DPRR brought to our attention that the State had devised a simple flow chart to aid in determining if a product qualifies as a minimum risk pesticide. <sup>3</sup> Based on this and other guidelines we have ensured BioDox is properly labeled and does not mislead the user.<sup>4</sup>

Though not required, we have also conducted our own toxicological and efficacy studies with several independent third-party laboratories including Microchem Labs and Q Laboratories. These studies are available on our website for your review as well as the cited references in this communication.

BioDox is produced in a GMP (Good Manufacturing Practices) facility located in Grass Valley, CA. Our consistency and validation reports are generated with a third party GLP (Good Lab Practices) testing facility located in Nevada City, CA.

BioDox is safe for workers and consumers as well as the ecosystem. If you have any questions or concerns, please feel free to reach out to our team.

Sincerely,

**Justin Gonzalez** 

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- 1. FDA. [Online] Https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm?fr=173.300
- 2. Rutz, Roy. ENF 01-08 Chlorine post harvest commodity treatment. 2001.
- 3. CDPR Minimum Risk Pesticide Exemption Qualification Flow Chart rev12/06/21.
- 4. Jolynn Mahmourdi-Haeri. A guide to understanding pesticide registration. October 2015.
- 5. http://cdpr.ca.gov/docs/registration/sec25/sect25intro.htm>. [Online]

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