



April 3, 2023

Subject: Detrex Generally Regarded as Safe (GRAS) Statement

To whom it may concern,

Hydrochloric acid in concentrated form is a strongly corrosive agent and the consequences of exposure to it are well known. However, as it is used in food processing, or as a food additive to adjust the pH, hydrochloric acid is neutralized or buffered by the food to which it is added. Thus, human consumption is not of the acid, but of the chloride ion in the salts formed in the neutralization process. The small amounts of hydrochloric acid that may persist in foods or drinks, would, in turn, be neutralized and buffered during ingestion and digestion, or after absorption. Hydrochloric acid is also a natural secretory product of the stomach of animals, including man (about 0.5 percent concentration in the gastric juice). The normal production of hydrochloric acid by the stomach exceeds manyfold the amounts that could be derived from foods.

Animal experiments have not revealed untoward effects of hydrochloric acid consumption in amounts greatly exceeding those that can be reasonably expected to result from consumption of foods treated with hydrochloric acid.

Based on these considerations, the US Food and Drug Administration's Select Committee on GRAS Substances (SCOGS) has concluded the following:

There is no evidence in the available information on hydrochloric acid that demonstrates or suggests reasonable grounds to suspect a hazard to the public when it is used at levels that are now current or that might reasonably be expected in the future.

In accordance with this finding, which dates to 1979, Hydrochloric Acid was added to the SCOGS database, and its status as a GRAS substance subsequently became codified in Title 21 of the Federal Code of Regulation, Part 182.1057.

Based on this ruling the Hydrochloric Acid manufactured by Detrex Corporation in their Ashtabula, OH facility meets all FDA requirements to be considered a GRAS substance.

Sincerely,

A handwritten signature in black ink that reads "Dave Morgan". The signature is written in a cursive style with a large, looped initial "D".

Dave Morgan
Global Product Manager, Hydrochloric Acid
Detrex Chemicals