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A.16 - Hypochlorous acid

MSF strongly supports the application for the inclusion of aqueous hypochlorous acid (HOCl) in the WHO Model List of Essential Medicines, in section 15.1 (Antiseptics), section 15.2 (Disinfectants), and section 13 (Dermatological medicines).

Hypochlorous acid is a chlorine generating disinfectant. The active chlorine released by hypochlorous acid has a broad spectrum of bactericidal, virucidal, and fungicidal activity. Hypochlorous acid is a well-studied, non-toxic, non-corrosive, easy to use compound, and a more effective and a safer alternative to other chlorine generating disinfectant agents, such as sodium dichloroisocyanurate (NaDDC).

After the coronavirus pandemic and the worldwide spread of environmental decontamination measures, hypochlorous acid has emerged as an efficient, cost-effective, and safe disinfectant. Simultaneously, previously unrecognized hazards associated with conventional disinfectants have been highlighted. In the eventuality of future epidemics and pandemics, hypochlorous acid is extremely valuable due to its broad-spectrum activity, including its efficacy against all variants of coronaviruses and highly resistant pathogens such as prions and HPV-16.

The European Chemical Agency (ECHA) lists hypochlorous acid as a biocide product type 1 (human hygiene), product type 2 (surface disinfection), product type 3 (veterinary hygiene), product type 4 (food and feed area) and product type 5 (drinking water).

Hypochlorous acid has been also approved by the US Food and Drug Administration (FDA) for disinfection of food-contact surfaces, for high level disinfection, for topical applications, for use in drinking water and as a no-rinse food sanitizer.

Since 2020, due to the need of specific guidance in the context of the COVID-19 pandemic, hypochlorous acid has also been listed in the following documents:

· The WHO list of coronavirus-effective biocides (Cleaning and disinfection of environmental surfaces in the context of COVID-19, WHO, 2020).

· The United States Environmental Protection Agency (EPA) “N” list of Disinfectants for use against SARS-CoV-2, “H” List EPA’s Registered Antimicrobial Products Effective Against Methicillin-resistant Staphylococcus aureus (MRSA) and/or Vancomycin-resistant Enterococcus faecalis/faecium, “G’ List EPA’s Registered Antimicrobial Products Effective Against Norovirus (feline calicivirus) and “Q” List - Disinfectants for Emerging Viral Pathogens.

· The Health Canada list of disinfectants with evidence for use against COVID-19 and list of surface disinfectants for emerging viral pathogens.

· The Australian Register of Therapeutic Goods, as a hospital grade disinfectant effective against COVID-19.

According to the application, since 2021 when the previous application for hypochlorous acid inclusion was submitted, costs of production have been highly reduced and multiple local manufacturing facilities have been established even in remote settings.

In 2021, MSF supported the inclusion of hypochlorous acid in the EML and emphasized the need to have a stable, concentrated product with a long shelf life (≥ 3 years), designed for easy and ready dilution to address shipping needs, particularly in low- and middle-income countries to minimize logistical constraints and enhance availability and affordability. According to the current application, these previously existing constraints are no longer relevant.

Considering all these elements, MSF urges the 25th Expert Committee on the Selection and Use of Essential Medicines to include hypochlorous acid in the WHO Model List of Essential Medicines, in section 15.1 (Antiseptics), section 15.2 (Disinfectants), and section 13 (Dermatological medicines).

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