April 27, 2020

Dr. Zaida Figueroa
Designated Federal Officer (DFO)
1200 Pennsylvania Avenue, NW
Washington, DC 20004

Dr. Figueroa:

The Household & Commercial Products Association (HCPA) thanks you for the opportunity to submit comments for consideration during the U.S. Environmental Protection Agency's (EPA) Scientific Advisory Board (SAB) COVID-19 Review Panel on April 30, 2020. It is evident that significant work has been done to address new areas of research. Given the short time frame it is important to consider published literature as well as work of other governmental agencies and research partners prior to beginning work. As the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than $180 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments, HCPA would like to submit the questions and comments below for consideration.

HCPA represents a variety of products including disinfectants that kill germs in hospitals, homes and restaurants. HCPA member companies work closely with the EPA and ASTM in the development and improvement of disinfectant efficacy test methods, providing important resources of expertise and laboratory hours for interlaboratory studies in these endeavors. Our member companies possess a wealth of talent that includes many experienced microbiologists, chemists, toxicologists, clinical specialists, application specialists and communication experts, with a variety of advanced degrees, long tenure in the industry and diverse perspectives. We would welcome the opportunity to assist as our members work daily to respond to the pandemic.

<u>Questions/Comments for Consideration</u>

- Are there other categories of antimicrobials that demonstrate sufficient viral performance to provide a public health benefit (e.g. food contact sanitizers, non-food contact sanitizers, laundry sanitizers, treated/impregnated materials)?
    - HCPA believes products for use in these categories will provide a public health benefit and can serve a critical role by demonstrating virucidal activity. The current EPA guidelines restrict that only disinfectants can make viral claims. Considering that these types of claims were previously allowed HCPA is aware that products other than disinfectants, e.g., food contact sanitizers, non-food contact sanitizers, laundry sanitizers, treated/impregnated materials, will also pass

the EPA required virucidal disinfection test for an enveloped virus like SARS-CoV-2. Before EPA established this stance, several products were registered as sanitizers with viral claims (EPA Reg. No. 69268-3 (sanitizer with virucidal claims), EPA Reg. No. 10324-81 (laundry sanitizer with HIV claim (See 1-15-15 stamped label with HIV claim approval)). The food contact sanitizer use is of concern as those facilities are currently using a surface disinfectant to inactivate the virus, using a rinsing step, then following with a food contact sanitizer as required. This excessive and labor-intensive process could be eliminated if food contact sanitizers could be labeled with viral claims once passing the virucidal disinfectant test. While the treated/impregnated articles typically demonstrate lower efficacy, when maintained with proper cleaning they provide continuous kill over months and could offer a long-term benefit.

- If the virus is proved to be transmitted in the air can a new air disinfection protocol be developed? Can air treatments reduce the amount of virus that reach the surface? Can the role of ventilation and indoor air exchanges in 'diluting out' airborne virus in both the air and on surfaces be explored? What is the risk of transmission indoors verses outdoors?

- Can work with FDA be done to validate if transmission to pets and back to humans is an exposure route? If so, what other disinfection methods can be employed to address this potential pathway?

- When determining if disinfection was effective it is important to consider and understand the limitations of using the Polymerase Chain Reaction method. While this method provides a good indication if the virus was/is present it does not detect an infectious virus. Is there a need for an additional method to detect if the virus is still infectious?

- Is fecal contamination a route of transmission?

- HCPA would like to direct the panel to the current (810 guidelines[1]) and historical (DIS/TSS) EPA guidelines that lay the foundations of how to determine the effectiveness of sanitizers, disinfectants, laundry products etc. We urge the panel to consider the effectiveness of SARS-CoV-2 alongside these pillars of public health. Current science tells us that SARS-CoV-2 is likely to be a relatively easy virus to kill and therefore we need to be mindful of promoting technologies in a COVID-19 vacuum that may not be effective against other pathogens in healthcare, industrial or residential environments. We caution the Agency to give the public a false sense of security.

- When it comes to PPE decontamination, we understand the need to increase reutilization of PPE, however the examples listed; N95 masks and hand sanitizers on gloves are under the purview of FDA as medical devices or hand-care monograph products. No actions should be taken without collaboration with the FDA or without consideration of the

[1] https://www.epa.gov/test-guidelines-pesticides-and-toxic-substances/series-810-product-performance-test-guidelines

regulatory framework needed for companies to deploy this type of technology safely and legally, e.g. Emergency Use Authorizations.

Thank you again for the opportunity to provide input on this very important public health matter.

Sincerely,

Andrea Mojica
Vice President, Regulatory Affairs