



September 13, 2023

Docket ID No. EPA-HQ-OPP-2023-0288

Ms. Luisa Samalot
Office of Chemical Safety and Pollution Prevention
Antimicrobial Division (7510M)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

**RE: Docket ID No. EPA-HQ-OPP-2023-0288
DRAFT Guidance for the Evaluation of Products
for Claims Against Viruses**

Dear Ms. Samalot:

ISSA, the worldwide cleaning industry association, greatly appreciates this opportunity to comment on the Draft Guidance for the Evaluation of Products for Claims Against Viruses (Docket ID No. EPA-HQ-OPP-2023-0288).

ISSA is a nonprofit, voluntary trade association that represents the commercial and institutional cleaning industry. Our membership is comprised of over 10,500 member companies worldwide, including manufacturers, wholesalers, and distributors of cleaning products, disinfectants, sanitizers and cleaning equipment, as well as cleaning service providers who use and apply these products on a daily basis.

ISSA supports the Draft Guidance for the Evaluation of Products for Claims Against Viruses (hereinafter “**Draft Guidance**”) because it would increase the number of sanitizer products that are effective against viruses that threaten public health, as well as increase the number of such sanitizer products that have reduced dwell time and possess a preferred environmental, safety and health profile. ISSA, therefore, urges EPA to issue the Draft Guidance as final in its present form for the reasons set forth below.

General Comments of ISSA in Support of the Draft Guidance. For a number of reasons, ISSA supports the Draft Guidance that would allow the addition of virucidal claims to products that meet the criteria for food/nonfood contact sanitizer claims consistent with current test guidelines. First and foremost, the Draft Guidance will empower manufacturers of antimicrobial products to produce and provide household, institutional and commercial customers with additional sanitizer products that are effective against viruses that are a threat to public health, including SARS-CoV-2 and other viral pathogens, emerging and otherwise. Additional products that are effective against viruses that threaten public health will provide the American public and businesses with the tools they need to protect the safety and health of their household, employees and invitees during the next outbreak of an emerging viral pathogen or other harmful viruses. Moreover, the Draft Guidance will ensure that a robust supply of efficacious sanitizers with virucidal claims is in place that will ensure there is no shortage of such essential products during an epidemic or pandemic.

Allowing the addition of virucidal claims for products that meet the criteria for food/non-food contact sanitizers will also result in an increase in the number of sanitizer products effective against viruses with reduced dwell time. In general, as a class of products, sanitizers require less dwell time compared to disinfectants to be effective. The Draft Guidance would increase the number of sanitizer products available to combat infectious viruses, all of which would generally require less dwell time compared to disinfectant products.

In a commercial or institutional setting, reduced dwell time results in substantial increases in cleaning efficiencies and a corresponding significant reduction in costs because of the reduced labor hours needed to apply sanitizer products with reduced dwell times. It is estimated that up to 80% of the costs associated with cleaning commercial, institutional and industrial facilities is labor related. As a consequence, small increases in cleaning efficiencies due to reduced dwell times will result in substantial savings in commercial, institutional and industrial settings.

In addition, the Draft Guidance will likely result in a greater number of efficacious sanitizer products with preferred environmental, safety and health profiles compared to disinfectant products with similar efficacy as it relates to virucidal claims. In general, sanitizers rely on less toxic chemistries, and therefore tend to be more environmentally preferable compared to disinfectant products. Sanitizers are more likely to be based on active ingredients that qualify for the EPA Design for the Environment label for antimicrobial pesticides that have been reviewed for human health and environmental fate.

Moreover, while delivering the above benefits, the Draft Guidance would also ensure that sanitizer products would be efficacious as claimed because the virucidal claims under the Draft Guidance would be based on the very same test methods and performance standards that are currently used to support existing virucidal claims. There are no proposed changes to the test methods or performance standards recommended for virus claims. As a consequence, sanitizer product performance against viruses will be based on well-established test methodologies under the Draft Guidance, ensuring product efficacy for those sanitizer products adding virucidal claims under the Draft Guidance.

As a consequence, ISSA urges EPA to finalize the Draft Guidance as proposed. ISSA greatly appreciates this opportunity to comment on the Draft Guidance, and is available to meet with EPA should the Agency need any clarification of our comments.

Respectfully Submitted,



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