

## AERIS RESPONSE TO THE TGA PROPOSAL FOR RESIDUAL CLAIMS FOR DISINFECTANTS

This submission is made on the behalf of Aeris Environmental Ltd with respect to the TGA "Stakeholder Consultation".

### 1. A DEFINITION OF RESIDUAL ACTIVITY OF A DISINFECTANT PRODUCT.

The proposed TGA definition "The Capability of a Disinfectant Product to continue to produce a reduction in the number of viable cells of relevant test organisms on a surface under used conditions defined on the label of the product" is considered appropriate.

### 2. TESTING STANDARD FOR RESIDUAL ACTIVITY CLAIMS.

A precursor to any residual activity disinfection validation should, we agree, be a test such as BS EN13697 or the TGA's Option A or Option B disinfectant tests.

The EN16777:2018 Test for viricidal activity is an appropriate precursor test to a residual test.

The ASTM method PAS 2424:2014 is inappropriate for the validation of 24 hours residual activity and is more appropriate for the validation of six days residual activity with each cycle of dry and wet abrasion and challenge inoculation representing 24 hours residual disinfectant activity.

A "multi touch" test as mentioned in the Discussion seems more appropriate than the suggested Abrasion Test.

### 3. ACCEPTANCE CRITERIA

The proposed criteria are appropriate but only if the test method is appropriate. The severity of the PAS 2424:2014 is not appropriate and a fairer test should be found.

### 4. LIMITATIONS ON CLAIMED RESIDUAL ACTIVITY PERIOD

So long as the residual disinfectant test method satisfactorily validates the claimed residual activity period there should be no limitation.

### 5. RESTRICTING RESIDUAL ACTIVITY CLAIMS TO SPECIFIC ORGANISMS

There is no basis for any restriction to claims relating to specific organisms so long as an appropriate test method is employed to validate such claims.

### 6. ALLOWING RESIDUAL ACTIVITY CLAIMS

This proposal is logical and consistent as previous TGA methodology.