

Response ID ANON-8W98-3C7H-N

Submitted to **Proposal for clarifying regulatory requirements for residual claims for disinfectants**
Submitted on **2021-03-03 15:01:50**

Introduction

What is your name?

Name:

What is your email address?

Email:

Would you like to receive updates on this consultation by email?

Updates:

What is your organisation?

Organisation:

Effective Organics Pty Ltd

Proposal 1: Definition of residual activity

definition:

Residual activity claims should only be allowed if the TGA stipulates one standard test method for all products (existing & new) to be tested against.

Proposal 2: Testing standards

testing:

Residual activity claims should only be allowed if the TGA stipulates one standard test method for all products (existing and new) to be tested against.

Proposal 3: Acceptance criteria

acceptance:

I agree.

Proposal 4: Limitations on claimed residual activity period

limitations:

I believe the TGA needs to stipulate set periods e.g. 24 Hrs, 7 Days, 14 Days, 30 Days.

Proposal 5: Restricting residual activity claims to specific organisms

specific organisms:

I believe the TGA needs to stipulate general bacteria and specific organisms to limit the amount marketing spin that can be put on any claims.

Proposal 6: Allowing residual activity claims

allowing claims:

Existing residual activity claims should be disallowed until a standard test is decided on by the TGA as it puts all products that have been abiding by the existing TGA rules and doing the right thing at a huge disadvantage to the companies making these unregulated claims. They put a marketing spin on a complicated area that confuses and misleads the general public. In the real world there is no way that one application of a product claiming to have 28 residual activity on a surface is going to be possible in every situation. In a controlled laboratory situation perhaps, but in the real world there are too many variables and too much risk when it comes to duty of care. If the TGA do settle on a test method then all products need to be tested against the new test, particularly the existing listings as it you must compare apples to apples. Some of the existing products making residual claims are doing so based on tests that were conducted to their own protocol and absolutely would not be able to substantiate such claims in a real world environment.

We would happily have our product tested only once there is a TGA standard test the EVERYONE has to test against, otherwise it is playing into the hands of the spin doctors and weasel words of the marketeers.