

Response ID ANON-8W98-3C7K-R

Submitted to **Proposal for clarifying regulatory requirements for residual claims for disinfectants**
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Introduction

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NSW Health

Proposal 1: Definition of residual activity

definition:

Use conditions are so variable. How can users be assured that the use conditions have parity with the conditions under which the residual activity has been tested?

Proposal 2: Testing standards

testing:

If residual activity is considered, then it should apply to pathogens other than bacteria and yeasts

Proposal 3: Acceptance criteria

acceptance:

agreed

Proposal 4: Limitations on claimed residual activity period

limitations:

The residual activity duration needs to be applicable to normal usage situations.
There is no benefit of having lengthy residual use claims if the treated surface would be ordinarily re-cleaned or disinfected within that time.
ie no point having lengthy residual claims for a product used to clean and disinfect US probes that should be reprocessed before and after each and every use, and may be used multiple times in a day. Residual claims will not negate the need for that before and after reprocessing to happen.

Proposal 5: Restricting residual activity claims to specific organisms

specific organisms:

No. Users need to be able to understand the limitations of those claims to their particular clinical setting

Proposal 6: Allowing residual activity claims

allowing claims:

Sounds rather messy. Why not wait until you have validated suitable test methods.