

Response ID ANON-8W98-3C7D-H

Submitted to **Proposal for clarifying regulatory requirements for residual claims for disinfectants**
Submitted on **2021-03-24 19:05:28**

Introduction

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What is your organisation?

Organisation:

Sydney Dental Hospital & OHS

Proposal 1: Definition of residual activity

definition:

Yes - if TGA specifies the testing Standard that represents a realistic worst case scenario for measuring organic soil and the microbial burden for surfaces in all types of healthcare facilities and residential care facilities and childcare centres.

Proposal 2: Testing standards

testing:

'... and periods of greater than 24 hours for residual activity.' Definitely!!!!

Proposal 3: Acceptance criteria

acceptance:

The acceptance criteria should be the same as a freshly decontaminated surface.
Otherwise the label will have to say "Surfaces will remain sort-of-clean". (!)

Proposal 4: Limitations on claimed residual activity period

limitations:

No.

The target audience for these products includes staff in small healthcare facilities and residential care facilities and childcare centres who may have no access to anyone who can assist them to assess their facility's risks and the product's "sounds too good to be true but will save us time & money claims".

Proposal 5: Restricting residual activity claims to specific organisms

specific organisms:

Proposal 6: Allowing residual activity claims

allowing claims:

No!

The new test criteria need to apply retrospectively to all these products.

Sorry, but I think we need to be really careful, otherwise we'll sound like we're supporting the products in the advertisements in the USA that promise to cure cancer.