March 1, 2021

Kendall Ziner
Antimicrobials Division (7510P)
Office of Pesticide Programs
Environmental Protection Agency
2777 S. Crystal Drive
Arlington, VA 22202

RE: HCPA Comments on the use and benefits of the peroxy compounds: hydrogen peroxide, peracetic acid, peroxyoctanoic acid, and sodium percarbonate. EPA docket ID: EPA-HQ-OPP-2009-0546.

Ms. Ziner:

The Household & Commercial Products Association (HCPA) appreciates the opportunity to provide use and benefit information for the peroxy compounds: hydrogen peroxide, peracetic acid, peroxyoctanoic acid, and sodium percarbonate. Our membership manufactures, supplies, and incorporates peroxy compounds into end-use products and we thank the Agency for considering our submission. Several of our members are also part of the Peroxy Compounds Task Force (PCTF).

HCPA is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution, and sale of more than $180 billion annually in the U.S. of familiar and trusted consumer products that help household and institutional customers create cleaner and healthier environments.

If you have questions on any information submitted in our comments, please feel free to reach out to me at amojica@thehcpa.org.

Sincerely:

Andrea Mojica
Vice President, Regulatory Affairs

HCPA Comments

Peroxy compounds are used in a variety of settings including the home and both healthcare and food preparation facilities. During the pandemic, peroxy compounds have played a critical role and there are currently over 80 peroxy compound-based disinfectant products on EPA's List N: Disinfectants for Coronavirus. As disinfectants, peroxy-based compounds have demonstrated wide-ranging efficacy including efficacy against difficult to kill bacterial spores. These compounds are also compatible for use on different surfaces and materials.

In healthcare settings peroxy compounds are used in surface cleaners, sanitizers, disinfectants, sterilants, and in fogging applications. They have proven effective to reducing the spread of hospital-onset infectious diseases like *C. difficile* and are a critical part of the hygiene practices in the healthcare environment, e.g., peroxy compounds are used in products applied on medical devices and in hospitals. Products containing peroxy compounds are used in facilities called clean rooms that produce critical need products such as vaccines that are intended to be sterile or substantially free from microbiological contamination. The products are used to control or eliminate microorganisms from the production environment.

Peroxy compounds are also essential to assuring a safe and healthful food supply. Treatments with peracetic acid (PAA) in food preparation facilities are effective methods for the control of microbial contamination. These facilities generally follow a practice of cleaning, sanitizing and disinfecting food contact surfaces to help prevent the possibilities of food borne illnesses. In these instances, PAA can be used as a sanitizer, disinfectant or sterilant, depending on the contact time and concentration. In addition to PAA, hydrogen peroxide is also used to sterilize packaging.

Peroxy compounds decompose into water and oxygen easily and are readily biodegradable. Two peroxy compounds, hydrogen peroxide and peracetic acid, are also included on EPA's Safer Chemical Ingredient List (SCIL) as antimicrobial active ingredients. A third peroxy compound, sodium percarbonate is also included on the SCIL as an oxidant and oxidant stabilizer. All have been "verified to be of low concern based on experimental and modeled data."[1]

HCPA appreciates the opportunity to provide information to EPA on the peroxy compounds. As responsible stewards of their products, HCPA members work to ensure the safety and sustainability of their products. HCPA welcomes the opportunity to answer any questions on information presented in this document.

[1] https://www.epa.gov/saferchoice/safer-ingredients#searchList