

US EPA ARCHIVE DOCUMENT



Overview

Anti-Microbial Cleaning Products,
e.g. Mr. Clean, Febreze, Scrubbing
Bubbles, Windex Anti-Microbial

Non-Animal Hazard Evaluation,
e.g. formulation analysis, in vitro test
information

EPA Labeling Categories,
e.g. CAUTION (Toxic Category III
eye irritant)





General Approach

- Subdivide anti-microbial cleaning formulations into smaller categories, according to their expected mechanisms of eye and skin irritation.
- Gather non-animal and animal data for registered (and unregistered) products for each category.
- Conduct additional in vitro testing if needed.
- Factor all parameters into a non-animal approach, and determine its predictive capacity





Anticipated Approach

It is anticipated that the final product will be a tiered approach to both eye and skin irritation that would have a similar form to the Globally Harmonized System for skin and eye irritation





Estimated Time Frame

- All data, formulation and bucket information submitted and entered into database – Mid April
- Data gaps identified – End April
- Testing agreed to and initiated – Mid May
- First round data analysis – Early June
- Planned testing completed – End June
- Second round data analysis – End July
- Completion of submission document – Mid Sept/mid October





Progress

- Decisions made on categories, confidentiality (no data in the submission will be traceable to an individual company) and formulation descriptions.
- Seven companies (Clorox, Colgate Palmolive, Dial, EcoLabs, JohnsonDiversey, P&G and SC Johnson) have submitted ocular data and will assist in the program in various ways.
- Database has been constructed and most of ~330 animal studies (280 with full information), and ~500 in vitro studies (~160 paired with animal data) have been entered by category!

