



September 22, 2020

Ed Messina
Acting Director, Office of Pesticide Programs
2777 S. Crystal Drive
Arlington, VA 22202

Dear Mr. Messina:

The Household & Commercial Products Association (HCPA) understands that the EPA intends to issue documentation on test methods for long-lasting antiviral products and treatments. While HCPA acknowledges the constraints imposed on the Agency by the current pandemic, we do feel it is important for the Agency to solicit stakeholder input on this critical topic. Our members have extensive experience with efficacy testing and specifically residual test methods as well as extensive viral testing knowledge and BSL-3 safety experience. In providing a comment period this will allow stakeholders to provide knowledge of user preferences and address potential labeling concerns. In the interest of transparency and public trust we therefore urge the Agency to set up a short public comment period for any documentation that is published on this topic.

HCPA appreciates the Agency's continued dedication to ensuring that products are available during the pandemic. Thank you for your consideration.

Sincerely,

Andrea Mojica

Andrea Mojica
Vice President, Regulatory Affairs

cc: Anita Pease, Director, Antimicrobials Division
Kimberly Nesci, Acting Director, Biological Economic Analysis Division