# Code of Practice for Household & Commercial Cleaning Products Claiming Antibacterial Action

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# Code of Practice for Household & Commercial Cleaning Products Claiming Antibacterial Action

## 1. Preface

This Code of Practice has been developed to provide standards for advertising, labelling and performance to manufacturers and importers of cleaning products making claims of antibacterial action. It is based on a self-regulatory model that is self-assessable; i.e. the onus of responsibility to demonstrate compliance with the Code is on the Company at all times. The Australian Consumer & Specialty Products Association (ACSPA) encourages both member and non-member companies to comply with this Code

The Code has been developed with the input of key stakeholders including industry, consumers, regulators, and microbiologists.

## 2. Definitions

**'ACSPA'** means The Australian Consumer & Specialty Products Association

**'Antibacterial'** means reduces bacteria by $\log_{10}3$. (Refer to Appendix II).

**'Cleaning'** includes cleaning and conditioning

**'Cleaning Wipe'** means a piece of fabric used for cleaning, e.g. sponge, tissue, woven or non-woven cloth.

**'Code'** means the ACSPA Code of Practice for Household and Commercial Cleaning Products Claiming Antibacterial Action

**'Commercial Cleaning'** means the cleaning in commercial situations, including kitchens, bathrooms, toilets, floors, and laundries in industrial and institutional settings, such as hospitals, hospices, schools, nursing homes, restaurants, motels, hotels, offices and other areas accessible to the public or staff where the cleaning is to maintain good human hygiene standards.

**'Commercial Cleaning Products'** means detergents, laundry soaps and other preparations the primary purpose of which is commercial cleaning.

**'Conditioning'** means the application of an agent or product to improve the condition of an object or surface eg its odour, feel, texture or appearance, and/or to provide protection of the object or surface.

**'Deodorisers'** means products designed to mask or remove unacceptable odours in the air.

**'Household Cleaning Products'** means detergents, laundry soaps and other preparations the primary purpose of which is household cleaning.

**'Industrial Food Sanitisers'** means sanitisers exclusively used for cleaning food contact surfaces in industrial situations, which includes Clean In Place (CIP) applications or other industrial food premises cleaning applications. Their performance outcomes are in accordance with recognised International, Australian and Industry Standards. The prime purpose of industrial food sanitisers is to protect food products from unacceptable levels of contamination with pathogens and food spoilage organisms.

**'Household Cleaning'** means cleaning in domestic situations.

**'Sanitiser'** means an agent that reduces the number of bacterial contaminants to meet public health requirements. The term is commonly applied to substances that are applied to inanimate objects such as food contact surfaces in kitchens, and includes those for use on non-food contact surfaces.

## 3. Scope

This Code of Practice relates to any of the following product categories which claim an antibacterial action:

3.1 Sanitisers (other than industrial food sanitisers)

3.2 Deodorisers;

3.3 Cleaning wipes;

3.4 Household cleaning products; and

3.5 Commercial cleaning products.

which are not subject to either the Therapeutic Goods Act 1989 or the Agricultural and Veterinary Chemicals Code Act 1994, which regulate disinfectant products.

## 4. Purpose

The purpose of this Code is:

- to provide industry with a clear set of standards for advertising, labelling and performance for cleaning products making claims of antibacterial action, and
- to provide consumers with the assurance that cleaning products claiming antibacterial action will kill bacteria

## 5. Principles of the Code

The basic principle underlying this Code is that antibacterial action claims must not be false or misleading.

To ensure that anti-bacterial action claims are not misleading or deceptive, manufacturers should ensure, among other things, that:

i. The exact nature of the antibacterial action is clearly identified;

ii. The antibacterial action occurs when the product is used as directed;

## 6. Standards

To comply with this Code, the following standards must be met:

### 6.1 Antibacterial action claims must be specific:

Consumers should be able to readily identify the exact nature of the antibacterial action being claimed; e.g. if an antibacterial substance is included in a product as a preservative only, then the claim should not imply antibacterial action beyond preservation.

The claim should be clear, concise and simply worded.

Claims for antibacterial effectiveness should be limited to those uses where test methods are able to demonstrate the claimed antibacterial action.

### 6.2 Consistency between claim of antibacterial action and the directions for use:

The antibacterial action must take place when the product is used according to the directions for use. Therefore the directions for use should reflect the conditions under which the product is performance tested.

If particular situations are known where the antibacterial action would be negated or neutralized e.g. by inappropriate use of the product, this should be indicated in the directions for use on the label.

It is recommended that the directions for use on the label contain a statement similar to the following:

***"This product should be used in conjunction with good hygiene practices".***

### 6.3 Claim of antibacterial action to be valid for the expected lifetime of the product:

An antibacterial claim must be valid for the expected lifetime or recommended use life of the product.

There should be an indication on the label:

- if particular storage conditions or a limit on use life are required to maintain the claimed antibacterial action, and/or
- if the antibacterial action meets the claimed performance for a storage period of less than two years (i.e. expiry date should be indicated on the label if the shelf life is less than two years).

**6.4 Reproducible performance testing for measurement of antibacterial action:**

Performance of antibacterial action is to be demonstrated either:

1. in accordance with the bactericidal test in Therapeutic Goods Order, TGO 54; or

2. by **both** of the following:

   (a) A microbiological in vitro test, with appropriate soil added which is relevant to the antibacterial action claimed with a performance indicator of a minimum 3 $\log_{10}$ kill compared to an appropriate control.

   Reusable impregnated wipe products that make an antibacterial action claim within the wipe may be different as the antibacterial substance is released to produce its antibacterial action within the material. In these cases, the reduction may be demonstrated through an aqueous extract from the wipe and will be considered satisfactory provided that a 3 $\log_{10}$ reduction is achieved.

   *Staphylococcus aureus* and *Escherichia coli* are to be the minimum set tested as indicator organisms, with other organisms added if relevant for the use where the antibacterial action is claimed.

   (b) A suitable microbiological simulated in-use test, representing normal use conditions, showing a statistically significant antibacterial performance over and above an appropriate control product. Wherever possible, the control should be the formulation with the active ingredient(s) omitted.

A wide variety of published and official standard methods exist for the measurement of antibacterial efficacy which are either nationally or internationally recognized. However, some antibacterial applications are not specifically covered by these testing procedures. For new products or novel application systems, methods of testing may need to be either developed

or existing methods modified in order to give relevance to the data generated.

Modifications such as utilizing microorganisms relevant to the application or modifying the antibacterial contact time to reflect conditions of use, are commonly made to existing methods.

Standard test methods conducted in accordance with the principles of good laboratory practice (GLP) should be used where available and relevant. However, where new test methods are to be developed or existing methods modified, four criteria are essential to conform to this code of practice.

i) The performance test method must be appropriate for the product and claim. The conditions of the test must reflect as closely as possible the in-use criteria of the product, e.g. contact time, appropriate soil, etc.

ii) The performance test and result must be able to be reproduced by a third party.

iii) The antibacterial activity claimed should have as part of the performance tests, a suitable control to demonstrate a significant antibacterial performance over and above an appropriate control product. Claims for significant antibacterial performance must be substantiated by the use of standard statistical evaluation methods. In so doing, the significance level should be set at the 95% confidence level (p=0.05). Wherever possible, the control should be the formulation with the active ingredient(s) omitted.

iv) The performance test method used is to be consistent throughout the life of the product.

## 7. Administration, Commitment and Reporting

### 7.1 Administration

The Code is to be administered by ACSPA through the Code Administration Committee, who are responsible to the ACSPA Board of Directors.

The Code Administration Committee will conduct periodic reviews of the effectiveness of the Code and its procedures, and, where appropriate, recommend amendments. These reviews will be conducted annually.

At the time of the Code review, ACSPA may seek the participation of the following stakeholder groups:

- A consumer representative with public health experience and an understanding of regulatory and advertising controls;
- A recognised expert microbiologist
- A representative from the TGA
- A person with extensive experience in advertising and its controls.

### 7.2 Code commitment and compliance

All member companies of ACSPA which market products falling within the scope of the Code, are expected to be compliant with the Code. Such companies will be asked to confirm their compliance with ACSPA in writing annually.

Their compliance will be promoted.

### 7.3 Reporting

An annual report will be prepared and presented to the ACSPA Board. It will record:

- complaints received and action taken
- amendments to the Code to overcome unfair, unexpected or inappropriate outcomes
- improvements in Code administration

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**APPENDIX I**

## BACKGROUND

In recent years there has been increasing awareness of the prevalence of harmful pathogens in the home environment and in public settings such as restaurants, schools and fast-food outlets. Scientists have identified the importance of good hygiene practices to prevent the spread of these pathogens by cross contamination. Marketers of household and commercial cleaning products have responded and there are now many products on the Australian market, which claim antibacterial action. Many of these products, such as kitchen cleaners, floor cleaners, general surface cleaners etc, are both cleaners and disinfectants, and are regulated by the Therapeutic Goods Administration.

Products such as antibacterial handwashes, are both cleaners and antiseptics and are also regulated by the Therapeutic Goods Administration. Other products such as cleaning cloths and sponges, dishwashing liquids, or laundry powders, may also claim an antibacterial action, however, there are no regulatory requirements for supporting data, as there are for disinfectants and antibacterial handwashes/antiseptics.

Many of these antibacterial cleaners and sponges/cloths have been promoted as being of value in helping to keep food preparation areas in the kitchen clean and hygienic. Consequently advertising campaigns, promoting the benefits of using such products in the kitchen to help keep food safe, have been launched.

This Code provides performance standards for cleaning products claiming antibacterial action, which are excluded as therapeutic goods. These products are not disinfectants which are therapeutic products, and therefore must comply with the Therapeutic Goods Act 1989 and the requirements of the Therapeutic Goods Order No.54.

**APPENDIX II**

## DEFINITION OF ANTIBACTERIAL

Pearsall & Trumble (1995) in the Oxford English Reference Dictionary define the term 'antibacterial' simply as a substance that is "active against bacteria". Singleton & Sainsbury (1995) in the Dictionary of Microbiology & Molecular Biology, have defined 'antibacterial agents': "Antibacterial agents: agents which kill, or inhibit the growth of, bacteria – e.g. certain antibiotics, antiseptics & disinfectants".

Consumer research undertaken by a number of large companies that manufacture household cleaning products, suggests that consumers understand 'antibacterial' to mean 'kills bacteria'. Therefore Industry has agreed to recognise the consumer understanding of "antibacterial" by requiring a test methodology that demonstrates the killing of bacteria by $\log_{10}3$.

In accordance with the above definition of "antibacterial", products which reduce bacteria by simple removal are NOT permitted to claim antibacterial action, e.g. an aqueous surfactant solution used to rinse a dirty surface may reduce the bacteria by removal of the bacteria. This is not regarded as 'antibacterial' action; this is an action of 'removing bacteria'.