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**From:** Pat Quinn [pquinn@theaccordgroup.com]  
**Sent:** 12/6/2017 3:32:46 PM  
**To:** Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Keigwin, Richard [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=151baabb6a2246a3a312f12a706c0a05-Richard P Keigwin Jr]  
**CC:** Keller, Kaitlin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d7a6b15adfd745c6ada1c121dec27ac4-Keller, Kai]  
**Subject:** Meeting Request--Efficacy Working Group on OECD Method Implementation Issues

**Importance:** High

Nancy/ Rick, the companies comprising the Efficacy Working Group ( ..the other "EWG" (; ) have asked me to request a meeting with both of you to discuss concerns they have regarding OPP's plans to implement the OECD Quantitative Efficacy Method for Bacteria and TB during the first few months of 2018. Those companies are :

- 1) Ecolab
- 2) Reckitt Benckiser
- 3) Procter & Gamble
- 4) Lonza
- 5) Stepan
- 6) Mason

These companies and others have expressed longstanding concerns about the readiness of the OECD Method for implementation; its reproducibility, and how the new method will co-exist with well-established efficacy methods ( AOAC Use Dilution Method, EN-13697 ) currently in place to test the efficacy of antimicrobial products.

The potential market impact of the OECD Method is enormous since certain chemistries ( Quaternary Compounds, Phenols ) which consistently pass the UDM test for hospital disinfectants regularly fail the OECD Method; these compounds comprise the majority of hospital disinfectants used in the U.S today. An estimated 75% of all concentrate disinfectants currently marketed will fail the OECD Method and as many as 1500 EPA registered disinfectant products will be jeopardized, requiring reformulation with Active Ingredient levels at much higher concentrations.

The EWG companies have a long historical involvement with the OECD Method , participating in test collaboratives and testifying in Paris in 2011 at the OECD when concerns expressed by the German and French delegations delayed the method's full approval. We have worked closely with BEAD and AD on these matters and continue that collaboration.

With a Guidance Document implementing the OECD Method for use in the U.S. now imminent, we want to ensure that broad industry concerns are expressed clearly and in a timely fashion. To that end, the EWG companies are requesting a one hour meeting with you for either January 9<sup>th</sup> or January 11<sup>th</sup> . We could meet anytime between 9am -5pm on 1/9 and anytime between 1-5 pm on January 11<sup>th</sup>.

Thanks in advance for your consideration of this request and we look forward to the discussion.

Pat

Ex. 6 Personal Privacy (PP)