

85353-5

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U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510C)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA Reg. Number: 85353-5

Date of Issuance: DEC 23 2008

Term of Issuance: Unconditional

Name of Pesticide Product: Copper Shield 91

NOTICE OF PESTICIDE:
[X] Registration
Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Global Brass and Copper Inc.
427 North Shamrock Street
East Alton, IL 62024

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all the data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit required by registration review under FIFRA Section 3(g).
2. Make the following labeling changes:
a. Revise the EPA Registration Number to read, EPA Reg. No. 85353-5.
b. Place the appropriate EPA Establishment Number on the product labeling.

Signature of Approving Official:

Marshall Swindell, Product Manager, Team 33
Regulatory Management Branch I, Antimicrobials Division

Date:

DEC 23 2008

The Confidential Statement of Formula dated October 22nd, 2008, is acceptable.

The following are a listing of Conditions of Registration for Antimicrobial Copper Alloy registrations and associated labeling issues:

Condition 1

CDA will prepare and implement an Antimicrobial Copper Alloy Stewardship Plan ("the Plan") designed to support the responsible use of antimicrobial copper products. The Plan will be submitted for EPA review and approval within two months after the registration date. If EPA determines at any time after 18 months following registration that the Plan is not being adequately or timely implemented or that implementation of the Plan is not effectively ensuring the proper sale, distribution, or use of antimicrobial copper alloy products, the registration may be automatically cancelled by the Agency by order with no opportunity for a hearing but only after notification to the Registrant and an opportunity to meet with the Director of the Office of Pesticide Programs.

The Plan will include, at a minimum, the following elements:

- (a) Outreach to the infection control community, including:
- (i) A goal of educating and reinforcing, for infection control professionals and other product users, the proper use of Antimicrobial Copper Alloys.
 - (ii) Written (including electronic) communications directed to associations of infection control professionals, including at the least APIC, ASHES, and any other relevant organizations identified by CDA or EPA, and State Departments of Health.
 - (iii) Outreach communications will be sent within six months after the date of registration and within one year after the date of registration, and then annually thereafter on the anniversary of the date of the registration unless more frequent outreach is deemed necessary.
 - (iv) The content of the outreach communications will include statements explaining the registered claims and applications of Antimicrobial Copper Alloys, as well as their proper use. The communications also will inform the recipients about (1) the Antimicrobial Copper Alloy Working Group (see below) and invite their participation; (2) other sources of information on Antimicrobial Copper Alloys, including the Stewardship Website (see below). Additional content of outreach efforts will be developed as part of the Working Group activities.

- (b) Development of a Stewardship Website (“the Website”) under the auspices of the Copper Development Association (“CDA”).
- (i) The Website will serve as a resource for conveying accurate information to the public about the efficacy and proper use of Antimicrobial Copper Alloys.
 - (ii) The Website will include information on proper labeling and claims (including advertising); supporting science; applications; maintenance; and federal and state regulations and statutory requirements.
 - (iii) A question and answer or Frequently Asked Questions (FAQs) section will be incorporated to address common issues or questions raised with regard to Antimicrobial Copper Alloys.
 - (iv) The Website also will serve as a forum to correct any false or misleading third party statements or publications, including scientific papers, concerning Antimicrobial Copper Alloys. Any such false or misleading third party statements or publications will be corrected promptly after CDA or any member of CDA becomes aware of such and the responsive Website update will be incorporated promptly thereafter. CDA shall inform EPA within 30 calendar days following its receipt of any such false or misleading third party statements or publications and at that same time provide the Agency with a copy of such statement or publication along with a hard copy of the Website entry correcting such statement or publication.
 - (v) Links will be arranged and established by CDA between the Stewardship Website and the websites of appropriate infection control organizations, including but not limited to APIC and ASHES.
- (c) Establishment of an Antimicrobial Copper Alloy Working Group (“the Working Group”).
- (i) Invited participants will include alloy manufacturers, component makers, and representatives from the infection control community, including appropriate trade associations (e.g., APIC and ASHES) and State Departments of Health.
 - (ii) The Working Group will meet at least twice a year, either in person or by live video conferencing (WEBEX) or teleconferencing.
 - (iii) The Working Group will serve as a forum to expand educational efforts, develop outreach communications, and address any questions or concerns from the public and infection control community.
 - (iv) CDA shall provide EPA with minutes of any such meetings within 60 days of the end of any such meeting.

Condition 2

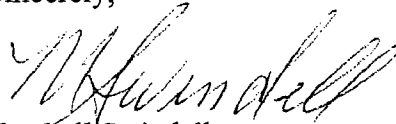
For at least the first 24 months after registration or until the Agency terminates this condition, whichever is later, the CDA will submit to EPA sample advertising materials. Advertising materials will be representative of advertisements intended for use in the marketplace.

3. Submit three (3) copies of the final printed label prior to releasing this product for sale.

A stamped copy of the label is enclosed for your records.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e) or as may be deemed appropriate by the Agency, as provided for in Condition 1. Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Branch I
Antimicrobials Division (7510P)

Enclosure: (Stamped Labeling)

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[Front panel]

Copper Shield 91

*NOTE: Product labels will bear the name of a copper alloy specified in the approved registration. Distributors may substitute a Product Brand Name in place of the name of the copper alloy on the label.

Active Ingredient:

Copper	91.3% [#]
Other	8.7% [#]

[#] Nominal percentages for purpose of review and approval. Actual percentage of copper and other ingredients will be indicated on labels distributed with the product.

Total 100%

EPA Registration No. ****

Made in the United States by *****

EPA Establishment No. *****

Distributed by *****

Net Contents: *****

ACCEPTED
with COMMENTS
EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
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[Back panel]

Laboratory testing has shown that when cleaned regularly:

[This [product] [surface] continuously reduces bacterial* contamination, achieving 99.9% reduction within two hours of exposure.]

[This [product] surfaces kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within two hours of exposure.]

[Antimicrobial Copper Alloys surfaces delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within two hours, even after repeated wet and dry abrasion and re-contamination.]

[When cleaned regularly, this [product] surface kills greater than 99.9% of bacteria* within two hours, and continues to kill more than 99% of bacteria* even after repeated contamination.]

[This [product] surfaces help inhibit the buildup and growth of bacteria* within two hours of exposure between routine cleaning and sanitizing steps.]

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

The use of a copper surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. The copper surface material has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[The directions in bracketed text below may be included in an insert. If so, there will be a statement to see the insert for additional directions for use of the product.]

[Directions for Use in the insert also may include installation and operation instructions, user manuals, and similar instructional materials appropriate for the end use product. No additional pesticidal claims will be made as part of these materials.]

Proper Care and Use [of Copper Shield 91]: The use of [antimicrobial copper surfaces] [this surface] does not replace standard infection control procedures and good hygienic practices. Surface[s] must be cleaned and sanitized according to standard practice. Health

care facilities must maintain the product in accordance with infection control guidelines; users must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.

Surface[s] may be subject to recontamination and the level of active bacteria at any particular time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order for the surface to have proper antimicrobial effect, the product must be cleaned and maintained according to the directions included on this label.

This product must not be waxed, painted, lacquered, varnished, or otherwise coated.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of the [antimicrobial] copper surface. Cleaning agents typically used for traditional touch [hard] surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. [Normal tarnishing or wear of [antimicrobial] copper surfaces will not impair the antibacterial effectiveness of the product.]

This product can not be used for any direct food contact or food packaging uses.

[This product may be used in hospitals, other healthcare facilities, and various public, commercial, and residential buildings for the non-food contact surfaces listed below.] [The following statement will appear on the label if the use involves potential exposure to outdoor conditions: Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings ~~ACCEPTED~~ and brackets with COMMENTS ?
- Bedrails, assistance rails, EPA Letter Dated:
- Toilet safety rails
- Carts

Hospital carts (table surfaces, handles, legs) Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 85353-5

Computer carts

Record carts

Phlebotomy carts

Other Carts (tables/surfaces, shelving, railings, handles, pulls)

- Equipment carts (horizontal surfaces, frames; handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever

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- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles
 - Medical equipment knobs, pulls and handles for:
 - Drug delivery systems
 - Monitoring systems
 - Hospital beds
 - Office equipment
 - Operating room equipment
 - Stands and fixtures
- Types of knobs: e.g., Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs
- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars

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- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges)
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles
- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers

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Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates
- Lids of laundry hampers, trash canisters, and other containers

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Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails

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- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers

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Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring

STORAGE AND DISPOSAL

Copper Shield 91 should be disposed in a responsible manner, including recycling.

WARRANTY STATEMENT

If used as intended, Copper Shield 91 is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

Optional Label Claims:

[Residential]

- Kills 99.9% of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
 - This product kills *bacteria continuously.
 - Kills bacteria continuously
 - This product inhibits the growth of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
 - Continuously kills bacteria on its surface
 - Continuously reduces bacterial contamination
 - Kills/eliminates/reduces germs/bacteria left behind (by dirty hands)
 - Works even when you're sleeping.
 - Provides On-Going Protection
 - Continues to reduce/kill bacteria even when you don't have time to clean/disinfect
- * Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

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[Industrial and Commercial]

- Kills 99.9% of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- Kills *bacteria continuously.
- Inhibits the growth of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously Reduces bacterial growth on this common touch surface

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- Continuously kills bacteria left behind on this surface by users/the public/your customers.

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

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