



# Acceptable Claims for Articles Treated with Antimicrobial Preservatives

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## Introduction

An antimicrobial preservative used to treat an article is always required to be registered under the *Pest Control Products Act* for that use. Claims made about an article treated with an antimicrobial preservative must be consistent with the approved label for that antimicrobial preservative. **This document provides general guidance on acceptable labelling claims for articles treated with antimicrobial preservatives.** It is intended to help registrants or users of antimicrobial preservatives, as well as distributors and retailers of articles treated with antimicrobial preservatives, to be compliant with the regulatory requirement under subsection 6(7) of the *Pest Control Products Act* with regards to packaging and advertisement of pest control products. It is the responsibility of manufacturers, importers, retailers and distributors of treated articles to ensure that the claims associated to the articles treated with antimicrobial preservatives are consistent with the guidance provided in this document, as well as in Regulatory Directive 2016-01: *Guidelines for the Advertising of Pest Control Products*.

## Guiding Principles

- 1) The treated article may only reference the type of organism(s) for which the antimicrobial preservative was registered (in other words, bacteria, fungi, mould and/or mildew, etc.). If the antimicrobial preservative label does not specifically reference the type of organism for which the product was registered, the claims about the treated article itself cannot refer to specific types/species of organisms. In such a case, only the general purpose of the treatment may be stated (for example, *“This article contains a preservative to extend its shelf life”*).
- 2) Claims such as *“antimicrobial”* and *“preservative”* cannot be used alone and must be properly qualified. A properly qualified claim would be similar to the following:  
  
*“Treated with an antimicrobial that provides mildew-resistant dried paint coating”*.
- 3) Labelling claims must not create false or misleading impressions. Label claims with respect to treated articles used in areas where food-borne or disease-causing organisms may be present have the potential to create the misleading impression that the article provides protection against food-borne and disease-causing bacteria. This should be addressed through very careful narrowing and qualification of the non-public health claims, as in the following examples:  
  
*“This product does not protect users or others against food-borne (or disease-causing) bacteria. Always clean this product thoroughly after each use”*, or  
  
*“This product does not protect users or others against bacteria, viruses, germs or other disease-causing organisms. Always clean this product thoroughly after each use”*.
- 4) Claims should be limited to the effect of the antimicrobial treatment on the pest itself (for example, *“prevents aesthetic disfigurement caused by mould”*). A claim that goes beyond this in terms of alleged efficacy-related health benefits such as *“prevents infection”* or product labels that identify specific pathogens, are not permitted (for example, effective against *E. coli* O157 H7). See Regulatory Directive 2016-01: *Guidelines for the Advertising of Pest Control Products* for more information.

- 5) References to pesticide properties should not be given any greater prominence than any other described product feature. All references to the pesticidal properties and the required qualifying statements should be located together, should be printed in type of the same size, style and colour, and should be given equal prominence to any other described product feature.

Below are examples of acceptable labelling claims for articles treated with antimicrobial preservatives, provided they are consistent with the approved use pattern of the registered antimicrobial preservative used for treatment. The following examples are not intended to be an all-inclusive listing of acceptable claims.

#### **In-can preservation (for example, paints, adhesives and household detergents)**

- This article contains a preservative to extend its shelf life.
- A fungistatic agent has been incorporated into the article to prevent deterioration caused by mildew.
- Article treated to resist deterioration by mould fungus/mildew.
- This article has been treated with a fungistatic agent to protect the product from spoilage.
- This article contains a preservative to inhibit the growth of spoilage bacteria and fungi during the manufacture, storage and use of water-based emulsions.
- Article treated for the preservation of decomposable raw material solutions or dispersions during storage.
- This article contains a preservative that imparts in-can protection.

#### **Dry-film preservation (for example, paints, caulking and sealants)**

- This article contains a preservative to prevent film discolouration by algae/fungi.
- A fungistatic agent has been incorporated into the article to make it resistant to stain and deterioration caused by mildew.
- Article treated with a preservative to resist deterioration by mould fungus/mildew.
- Dried paint film treated to resist mould fungus and stains caused by mould.
- This article has been treated with an antimicrobial in order to allow the dry enamel coating to resist discolouration from mildew.
- Formulated to resist mildew growth on the paint film.
- This article contains a preservative to resist film attack by mildew.
- This article contains a preservative to prevent paint film spoilage.
- This article contains a dry-film preservative.

#### **Plastic preservation (for example, lawn furniture and garden hoses)**

- This article contains a preservative to prevent bacteria from degrading the product.
- This product contains an antimicrobial agent to prevent defacement caused by mould/mildew.
- This article has been treated with a bacteriostatic and fungistatic additive to prevent physical breakdown or embrittlement of the plastic.

- This article has been treated with a preservative to protect the vinyl compounds from mildew growth and stiffening caused by bacteria and fungi.
- This article contains a preservative to prevent aesthetic disfigurement.

**Textile preservation (for example, socks, canvas, tarps, tents and awnings)**

- This article has been treated with an antimicrobial agent to control odours.
- This product has been treated to resist the development of bacterial odours.
- Extends the useful life of the article by controlling deterioration caused by mould/mildew.
- This article contains a preservative to mitigate the development of odours.
- This article has been treated with an antimicrobial agent to preserve the processing materials and finishing yarns and cloth during storage.

**Wood preservation (for example, joinery/millwork, wood for above ground and ground contact)**

- Finished wood products that are typically not in ground contact have been treated with a preservative to impart in-service protection against decay fungi.
- Wood has been treated with preservative to provide protection against wood decay fungi for above ground and ground contact.