

Marketing Treated Textiles in the United States

About FIFRA

FIFRA is a federal law that regulates the use of pesticides, including antimicrobials, in the United States. FIFRA provides that pesticides must be registered. Goods, including textiles, which have been treated with a pesticide do not need to be registered with the EPA, provided they meet the requirements of the Treated Articles Exception.

The Treated Articles Exception provides an exemption from all requirements of FIFRA for qualifying articles or substances treated with, or containing a pesticide, if:

- 1. The incorporated pesticide is registered for use in or on the article or substance, and;**
- 2. The sole purpose of the treatment is to protect the article or substance itself.**

To qualify for the Treated Articles Exemption, both conditions above must be met. If both are not met, the article must be registered as being a pesticide in its own right.

Manufacturers and sellers of treated goods can find themselves outside of the Treated Articles Exemption by making public health claims that extend beyond the protection of the article itself. In addition, any claims about the pesticide contained in the treated article must be consistent with the claims on the pesticide label.

Do Arch® Products Satisfy the Requirements of the Treated Articles Exemption?

Arch Chemicals, Inc. offers the following products that are registered for use in the United States for treating textiles:

- **Reputex™ 20 Antimicrobial. EPA Registration #1258-1253.**
- **Reputex™ 48 Antimicrobial. EPA Registration #1258-841.**

When you incorporate these Arch® products into your textile manufacturing processes according to label directions, you protect the textile from odor-causing antimicrobial growth.

How Do I Describe the Benefits of Treated Textiles to My Customers and Stay within the Treated Articles Exemption?

Benefit:

A key benefit of an antimicrobial treated textile is its lasting freshness when used in apparel. This benefit is achieved by controlling the number of odor generating bacteria, giving consumers confidence that their apparel will keep that just-laundered effect for longer. Consumers will have the option to use their products for longer between washes - saving consumers time and money.

Example of an acceptable claim:

This product has been treated to help keep it fresher for longer. The antimicrobial treatment works by combating the growth of odor-causing bacteria arising during normal use and complements existing cleaning routines.

Benefit:

Consumers are looking for ways to save water, energy, and detergent. Less frequent washing offers these savings.

Example of an acceptable claim:

This product has been treated with a durable textile treatment which combats odor-causing bacteria arising in normal wear – offering you savings by requiring less frequent washing.

Choose Arch Chemicals, Inc. as your resource for antimicrobial treatments. We offer a variety of registered products and can support you in developing compliant marketing claims. Contact us to learn more about how we can become a part of your textile and apparel treated solution.

¹40 CFR 152.25(a).

²U.S. EPA, Pesticide Registration (PR) Notice 2000 – 1. Notice to Manufacturers, Formulators, Producers and Registrants of Pesticide Products.