

Crosswalk Table for Non-public-Health Guidelines

This table provides a crosswalk between the 91b Series non-public-health test guidelines and the new 810 Series test guidelines. In certain instances, the methods used to support public health related label claims may also be used to support non-public-health label claims, with some exceptions (e.g., microorganisms related to odor or for animal pathogens). This crosswalk is intended to assist interested parties in determining which 810 guidelines may be appropriate for generating data to support non-public-health claims. In addition, other testing approaches also may be acceptable to support non-public-health label claims.

Registrants and applicants should also note that the agency has waived all requirements to submit efficacy data unless the pesticide product bears a claim to control pest microorganisms that pose a threat to human health and whose presence cannot readily be observed by the user including, but not limited to, microorganisms infectious to man in any area of the inanimate environment. However, each registrant must ensure through testing that his products are efficacious when used in accordance with label directions and commonly accepted pest control practices. The agency reserves the right to require, on a case-by-case basis, submission of efficacy data for any pesticide product registered or proposed for registration. [see 40 CFR Part 161.640, footnote (1)]

Label Claim	91 Series Guideline Number	810 Series Guideline Number
Disinfectants (animal health). Microorganisms infectious for both man and animals.	§ 91-52(a)(1)(i). Test Standard. Same as § 91-2 (b)(1), (c)(1), (d)(1), or (g)(1)	810-2200 (d)(1), (d)(3), (d)(5), or (g)(1)
	§ 91-52(a)(1)(ii) Suggested performance standard. Same as § 91-2 (b)(2), (c)(2), (d)(2), or (g)(2)	810-2200 (d)(1)(iv), (d)(3)(iv), (d)(5)(iv), or (g)(1)(iii)
Microorganisms infectious only for animals. Claims are the same as those which are recommended for public health uses, except for substitution of specifically claimed animal pathogens as test microorganisms.	§ 91-52(a)(2)(i). Test Standard. Same as § 91-2 (e)(1), (f)(1), or (i)(1)	810-2200 (e)(1)(i), (f)(1)(2)(3), or 810-2200 (d)(9) (i)(ii)(iii)
	§ 91-52(a)(2)(ii) Suggested performance standard. Same as § 91-2 (e)(2), (f)(2), or (i)(2)	810-2200 (e)(1)(ii), (f)(4), or 810-2200 (d)(9)(iv)
Odor control treatments (non-residual). Odor-causing bacteria should be employed as test microorganisms.	§ 91-52(b)(1). Test Standard. Same as §91-2 (b)(1), (c)(1), or (j)(1)	810-2200 (d)(1), (d)(3), or 810-2300 (d)(1)
	§ 91-52(b)(2). Suggested performance standard. Same as § 91-2 (b)(2), (c)(2), or (j)(2)	810-2200 (d)(1)(iv), (d)(3)(iv), or 810-2300 (j)(2)(iii)
Odor control treatments (residual). Treatments to reduce the number of odor-causing bacteria or bacteriostatic odor control in the presence of moisture. Odor-causing microorganisms should be employed as the test microorganisms.	§ 91-52(c)(1). Test Standard. Same as § 91-2 (m)(1)	810-2300 (k)(1)
	§ 91-52(c)(2) Suggested performance standard. Same as § 91-2 (m)(2)	810-2300 (k)(2)
Laundry additives – Odor control pre-soaking treatments. Odor-causing bacteria should be employed as test microorganisms.	§ 91-53(a)(1)(i). Test Standard. Same as § 91-4(a)(1)(i) references: 91-2 (b)(1), (c)(1), (d)(1)	810-2400 (d)(1)(i) (A), (d)(1)(ii)(A), or (d)(1)(iii)(A)

	§ 91-53(a)(1)(ii) Suggested performance standard. Same as § 91-4 (a)(1)(ii) references: 91-2 (b)(2), (c)(2), (d)(2)	810-2400 (d)(1)(ii)(B), (d)(1)(ii)(B), or (d)(1)(iii)(B)
Odor-causing laundry additives (non-residual). Odor-causing bacteria should be employed as test microorganisms.	§ 91-53(a)(2)(i). Test Standard. Same as § 91-4 (a)(2)(i) or (a)(3)(i) § 91-53(a)(2)(ii) Suggested performance standard. Same as § 91-4 (a)(2)(ii), or (a)(3)(ii)	810-2400 (3)(i), or 810-2400 (4)(i) 810-2400 (3)(ii), or 810-2400 (4)(ii)
Odor-causing laundry additives (residual). Odor-causing microorganisms should be employed as the test microorganisms.	§ 91-53(a)(3)(i). Test Standard. Same as § 91-4 (a)(4)(i) § 91-53(a)(3)(ii) Suggested performance standard. Same as § 91-4 (a)(4)(ii)	810-2400 (e)(1)(i) 810-2400 (e)(1)(ii)
Carpet treatments. Odor-causing bacteria should be employed as test microorganisms.	§ 91-53(b)(1). Test Standard. Same as § 91-4 (b)(1) § 91-53(b)(2). Suggested performance standard. Same as § 91-4 (b)(2)	810-2400 (f)(1) 810-2400 (f)(2)
Mattresses and upholstered furniture. Odor-causing bacteria should be employed as test microorganisms.	§ 91-53(c)(1). Gases or vapors. (i) Test Standard. Same as § 91-4 (c)(1) § 91-53(c)(1). Gases or vapors. (ii) Suggested performance standard. Same as § 91-2 (b)(2) or (c)(2) or (j)(2)	810-2400 (g)(1) 810-2400 (g)(1)
Toilet bowl and urinal surfaces – Odor-causing. Odor-causing bacteria should be employed as test microorganisms.	§ 91-55(b)(1). Test Standard. Same as § 91-2 (b)(1), (c)(1), or (j)(1) § 91-55(b)(2). Suggested performance standard. Same as § 91-2 (b)(2), (c)(2), or (j)(2)	810-2200 (d)(1), (d)(3), or 810-2300 (d)(1) 810-2200 (d)(1)(iv), (d)(3)(iv), or 810-2300 (j)(2)(iii)
Toilet and urinal bowl water – Odor-causing. Odor-causing bacteria should be employed as test microorganisms.	§ 91-55(c)(1). Test Standard. Same as § 91-7 (b)(1) § 91-55(c)(2). Suggested performance standard. Same as § 91-7 (b)(2)	810-2300 (i)(1) 810-2300 (i)(2)