



INFECTION
CONTROL
ASSOCIATION
AUSTRALIAN CAPITAL TERRITORY
PO Box 5122 Garran ACT 2605

02/05/2008

Ms Siepie Larkin
PO Box 100
Woden ACT 2606

Dear Ms Siepie

The Infection Control Association ACT appreciates the opportunity to comment on the 'Proposed changes to regulatory requirements for hospital, hospital and commercial grade disinfectants'.

After the breakfast meeting on the 22nd April the following comments were summarised:

- Reviewing the definition of Hospital Grade disinfectant (page vii)
 - Removing references to commercial premises (beauty therapy, podiatry) is acceptable as any premises conducting a skin penetration procedure is still addressed by (ii) procedures that are carried out involving the penetration of the human skin
- Risks associated with failure of disinfectants and related products (page 17)
 - Cannot group beauty therapy and hair dressing together as beauty therapists can perform skin penetration procedures
 - The group agrees the risk for a beauty therapist would be medium
- Reference to use of a disinfectant as a cleaner a number of times throughout the paper (page 18,19, 23)
- Efficacy Standards (page 22)
 - The report has quoted section 7.2.2 from The Infection Control Guidelines (DoHA), but then proceed to substitute the word detergent for disinfectant further into this section. Is the concept of cleaning before disinfecting understood?
- Prefer Option 4 as the proposed modified regulation of disinfectants and sanitisers
- **Question** : Do NICNAS look at the quantity/concentration of a chemical in a product ?

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