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8/31/2020

**Subject: Updated Emerging Viral Pathogen Claim – 2019 novel coronavirus (SARS-CoV-2)
EPA Reg. No. 1839-83**

Dear Stepan Subregistrant,

The emerging viral pathogen claim on the EPA master label for Stepan DETERGENT DISINFECTANT PUMP SPRAY (EPA Registration No. 1839-83) was recently updated. Since SARS-CoV-2 is an enveloped virus, Subregistrants may now reference directions for use against Human Rotavirus with a 3 minute contact time. Subregistrants may communicate their 1839-83 subregistration product efficacy off-label claims against SARS-CoV-2, the virus that causes COVID-19, in accordance with the policy and terms of subregistration.

Per the master label for EPA Registration No. 1839-83, the following statement can be made on an 1839-83 subregistration:

*Product **X** (EPA Reg # **1839-83-xxx**) has demonstrated effectiveness against viruses similar to 2019 novel coronavirus (SARS-CoV-2) on hard non-porous surfaces. Therefore, this product can be used against 2019 novel coronavirus (SARS-CoV-2) when used in accordance with the directions for use against Human Rotavirus or Rhinovirus 39 on hard, non-porous surfaces. Refer to the CDC website (<https://www.cdc.gov/coronavirus/2019-ncov/index.html>) for additional information.*

Per the EPA’s emerging viral pathogen policy, the statements shall be made only through the following communication outlets: technical literature distributed exclusively to health care facilities, physicians, nurses and public health officials, "1-800" consumer information services, social media sites and company websites (non-label related). **These statements shall not appear on marketed (final print) product labels.**

In addition, per the EPA’s emerging viral pathogen policy, all such non-label communications intended for consumers shall be ceased and removed no later than 24 months after the original notification of the outbreak on the CDC website, unless the agency provides guidance to the contrary due to continued public health concerns.

Per the terms and conditions of the subregistration agreement, the subregistrant is responsible for complying with all applicable laws and regulations relating to its sale and marketing of subregistration products, including, without limitation, the EPA’s emerging viral pathogen policy.

Thank you,
Stepan Company