Title Page

Name and Address of Submitter

Livinguard, AG
Bahnhofstrasse 12
6300 Zug, Switzerland

Study Title
Request for Waiver for Acute Oral Toxicity
OCSPP Guideline 870.1100

Product
Fabric treated with Livinguard® Technology
EPA Reg. No. 95700-R

Date: 2/20/2020

Statements of No Data Confidentiality Claims

No claim of confidentiality is made for any information contained in this study on the basis of its falling within the scope of FIFRA section 10(d) (1) (A), (B), or (C).

Company : Livinguard, AG

Company Agent: Kevin Kutcel

Date: 2/20/2020

Signature _____

Good Laboratory Practice Statement

This document is descriptive. The descriptive information is not subject to the requirements of 40 CFR Part 160.

Sponsor/Submitter_____ Date 2/20/2020

Kevin R. Kutcel
Registration Agent

OCSPP Guideline 870.1100: Acute Oral Toxicity

Introduction

"Fabric treated with Livinguard® Technology" is an Enduse Product that contains the following active ingredients:

3 (Trimethoxysilyl) Propyldimethyloctadecylammoniumchloride	0.59%
Polyhexamethane Hydrochloride	0.23%
Silver Ions	0.16%
Propiconazole	0.40%

The total concentration of active ingredients in this product is 1.38%.
Please note that the active ingredients are impregnated into a treated fabric that comprises 98.62% of the product. Thus, the enduse product is fabric that has been treated with the active ingredients above.

Rationale for Requesting Waiver for Acute Oral Toxicity

According to the 2012 Guidance for Waiving or Bridging of Mammalian Acute Toxicity Tests for Pesticides, the product must be able to be ingested. In conversing with Product Safety Labs, it is not practical to conduct an oral toxicity study on a piece of fabric as there is no logical means by which the fabric could be ingested. Therefore, the registrant requests that the Acute Oral Toxicity requirement for the "Fabric Treated with Livinguard® Technology" be waived.