

## Executive Summary

Renfro Corporation is a leading global manufacturer, designer and distributor of legwear products in North America. In response to the COVID-19 pandemic, Renfro teamed up with healthcare professionals to design and manufacture a face mask to abide by the United States Centers for Disease Control (CDC) recommendation to wear cloth face coverings as source control, which may help reduce the risk of transmission of COVID-19 from both symptomatic and asymptomatic people. The face mask is manufactured in the USA.

**Renfro's face masks are made in accordance with the U.S. Food and Drug Administration (FDA) Emergency Use Authorization (EUA) for nonsurgical masks.**

The face masks comply with the FDA EUA issued on April 24, 2020.

Similar to face masks manufactured by other companies, the Renfro face masks utilize DuPont's SILVADUR™ 930 FLEX Antimicrobial. SILVADUR™ 930 FLEX Antimicrobial is an Environmental Protection Agency (EPA) registered antimicrobial widely used for inhibiting microbial growth in order to reduce odor on textiles and garments. SILVADUR™ 930 FLEX Antimicrobial is not registered for the control of viruses. SILVADUR™ 930 FLEX Antimicrobial has been registered for more than ten years for use in textiles and garments, including those that come in close contact with the face and body, such as pillow cases, sheets, jackets, towels, and athletic wear.

**Recent news articles incorrectly identified and made inaccurate statements regarding the type of Silvadur used in the Renfro face masks.**

Renfro face masks utilize DuPont's SILVADUR™ 930 FLEX Antimicrobial (EPA Reg. No. 464-785). The news articles erroneously provided links to a different EPA Registration for SILVADUR™ (EPA Reg. No. 707-313).<sup>1</sup>

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<sup>1</sup> See News Channel 9 article, available at <https://newschannel9.com/news/local/free-masks-provided-by-the-state-of-tennessee-treated-with-registered-pesticide> (accessed May 30, 2020) provides a link to Dow Chemical's registration for SILVADUR™, EPA Registration Number: 707-313. This is a different and unrelated EPA registration. SILVADUR™ is not used in Renfro masks. See also <https://www.newschannel5.com/news/newschannel-5-investigates/tennessee-governors-free-sock-masks-treated-with-registered-pesticide> (accessed May 31, 2020).

## **Summary of Facts**

The use of SILVADUR™ 930 FLEX Antimicrobial in the Renfro face mask complies with all applicable FDA and EPA policies and requirements and has been determined to be safe in consumer products.

- I. **Renfro’s face mask conforms to FDA’s COVID-19 policies and guidance and the EUA because it is intended to be used as “source control.”**
  - a. The Renfro face masks provided to Tennessee:
    - i. Comply with FDA EUA requirements issued on April 24, 2020.
    - ii. Support the CDC recommendation to wear cloth face coverings as source control.
  
- II. **Silvadur™ 930 FLEX Antimicrobial is regulated by EPA. Renfro’s face masks use a scientifically reviewed, EPA registered product based on Silver ions to inhibit the growth of microbes on the face mask.**
  - a. Silvadur has been used for years in all kinds of textile consumer products including high-end brand name products and it is widely accepted.
  - b. The EPA registration process, includes a comprehensive review of product safety to ensure there are no unreasonable adverse effects when used as approved.
  - c. EPA Registration for SILVADUR™ 930 FLEX Antimicrobial does not include any warnings regarding inhalation, skin contact risks, or irreversible eye damage.
  - d. Silvadur™ 930 FLEX Antimicrobial is termed a “pesticide” from the EPA perspective because it is intended to inhibit microbial growth and it is not intended to be harmful to humans, insects, or rodents. “Pesticide” is a broad term originating under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and means any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.
  - e. SILVADUR™ 930 Flex Antimicrobial is registered with the Agency and is classified as a pesticide.

**III. Silvadur™ 930 Flex Antimicrobial when applied to treated articles such as face coverings are at such low levels that the fabric poses negligible risk to consumers.**

- a. The independent International Oeko-Tex Association conducted a thorough evaluation of the technology, and confirmed SILVADUR™ 930 FLEX Antimicrobial has been demonstrated to be harmless to human health when used as intended.
- b. DuPont’s product information provides “Silver contains inherent antimicrobial properties. It has been a time-tested antimicrobial used since ancient times in healthcare, food preservation, and water treatment as well as other applications where effective, long-term bacterial protection is required.”
- c. Silvadur™ 930 FLEX Antimicrobial technology helps to inhibit bacteria growth and buildup of microbes on fabric surfaces.

**IV. The CDC Recommends use of cloth face masks in public settings.**

- a. The Renfro face masks were designed with the sole purpose of addressing the CDC recommendations for source control, which involves wearing a face covering or facemask over the mouth and nose to contain respiratory secretions, which may help reduce the risk of transmission of COVID-19 from both symptomatic and asymptomatic people.
- b. Renfro face masks are not and never purported to be medical devices.