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# Guidance for Industry Labeling OTC Skin Protectant Drug Products

## ***DRAFT GUIDANCE***

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For questions regarding this draft document, contact Michael Koenig at 301-796-2090.

**U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)**

**August 2008  
OTC**

# Guidance for Industry Labeling OTC Skin Protectant Drug Products

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**U.S. Department of Health and Human Services  
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*Contains Nonbinding Recommendations*

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**Guidance for Industry<sup>1</sup>**  
**Labeling OTC Skin Protectant Drug Products**

This draft guidance, when finalized, will represent the Food and Drug Administration’s (FDA’s) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the FDA staff responsible for implementing this guidance. If you cannot identify the appropriate FDA staff, call the appropriate number listed on the title page of this guidance.

**I. INTRODUCTION**

This draft guidance is intended to describe the drug monograph for over-the-counter (OTC) skin protectant drug products, found in 21 CFR part 347. This guidance is intended to help interested parties understand the monograph for OTC skin protectant drug products and meet the requirements of the monograph. In the monograph, skin protectant drug products are defined as drug products that temporarily protect injured or exposed skin or mucous membrane surfaces from harmful or annoying stimuli and may help provide relief to such surfaces (§ 347.3). Skin protectant drug products include lip protectant drug products, typically referred to as *lip balms*. This guidance focuses on the labeling of skin protectant drug products with single or multiple skin protectant active ingredients as well as those containing skin protectant active ingredients combined with active ingredients from other OTC drug monographs. The guidance does not address issues or requirements related to skin protectant drug products used as astringents.

FDA’s guidance documents, including this guidance, do not establish legally enforceable responsibilities. Instead, guidances describe the Agency’s current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are cited. The use of the word *should* in Agency guidances means that something is suggested or recommended, but not required.

**II. BACKGROUND**

We published numerous rulemakings related to OTC skin protectant drug products in the *Federal Register*. Below is a list of the significant skin protectant rulemakings addressed by this guidance:

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<sup>1</sup> This guidance has been prepared by the Office of Nonprescription Products in the Center for Drug Evaluation and Research (CDER) at the Food and Drug Administration.

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- 43 • 1978 advance notice of proposed rulemaking (43 FR 34628): establishes a monograph for  
44 OTC skin protectant drug products
- 45 • 1983 proposed rule (tentative final monograph) (48 FR 6820): proposed rule that  
46 proposes generally recognized as safe and effective (GRASE) active ingredients and  
47 required labeling for OTC skin protectant drug products
- 48 • 1989 proposed rule (54 FR 40808): proposes to amend the tentative final monograph to  
49 include indications for the treatment of poison ivy, oak, and sumac and for the treatment  
50 and/or neutralization of insect bites
- 51 • 2003 final rule (final monograph) (68 FR 33362): establishes GRASE active ingredients  
52 and required labeling in 21 CFR part 347
- 53 • 2003 final rule (technical amendment) (68 FR 68509): provides additional labeling  
54 claims that should not have been excluded from the final monograph
- 55 • 2008 final rule (technical amendment) (73 FR 6014): revises labeling requirements for lip  
56 protectants

57  
58 This guidance addresses the provisions of the 2003 final rule (68 FR 33362) as amended (68 FR  
59 68509, 73 FR 6014), which are codified at 21 CFR part 347. The 2003 rule establishes the active  
60 ingredients that may be used in OTC skin protectant drug products, how these active ingredients  
61 may be combined with each other and with certain other classes of OTC active ingredients, and  
62 the labeling requirements for OTC skin protectant drug products. The 2003 final rule  
63 incorporates standardized labeling content and format requirements established by the FDA in  
64 1999 (64 FR 13254, 21 CFR 201.66). In addition to other OTC skin protectant drug products,  
65 the 2003 final rule addresses astringents. However, the 2003 final rule does not substantively  
66 revise the requirements previously established in the 1993 final rule for OTC skin protectant  
67 drug products used as astringents (58 FR 54458). Therefore, this guidance does not address  
68 these drug products.<sup>2</sup>

### **III. SKIN PROTECTANT ACTIVE INGREDIENTS**

#### **A. Which skin protectant active ingredients have special requirements?**

74  
75 There are 19 GRASE OTC skin protectant active ingredients (§ 347.10). Three active  
76 ingredients have special requirements: cod liver oil, colloidal oatmeal, and mineral oil. A skin  
77 protectant drug product containing cod liver oil as an active ingredient also must include mineral  
78 oil (§ 347.10(e)). In addition, a skin protectant drug product containing cod liver oil must be  
79 labeled so that the quantity used in a 24-hour period does not exceed 10,000 USP units of  
80 vitamin A and 400 USP units of vitamin D (cholecalciferol). A skin protectant drug product can  
81 contain colloidal oatmeal at a minimum of 0.007 percent or mineral oil at a minimum of 50 to  
82 100 percent as single active ingredients. However, a skin protectant drug product containing  
83 both colloidal oatmeal and mineral oil must include a minimum of 0.003 percent colloidal  
84 oatmeal and 30 to 35 percent mineral oil (§ 347.10).

85

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<sup>2</sup> Astringent active ingredients that may be used in OTC drug products are listed in 21 CFR 347.12, and labeling requirements for these astringents are provided in 21 CFR 347.52.

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### **B. Which skin protectant active ingredients can be combined?**

86  
87  
88 Although there are some limitations, all skin protectant active ingredients except sodium  
89 bicarbonate and topical starch can be combined with one or more of a subset of other skin  
90 protectant active ingredients listed in § 347.10. A skin protectant drug product containing cod  
91 liver oil also must contain another active ingredient (§ 347.10(e)). In all instances except the  
92 combination of colloidal oatmeal and mineral oil, the allowed concentrations of each active  
93 ingredient remain the same whether the active ingredient is used singly or in combination with  
94 other active ingredients (§ 347.20). Section III.A. of this guidance describes the amounts of  
95 colloidal oatmeal and mineral oil required when these ingredients are combined with each other.  
96

97 The following lists identify the three groups of skin protectant active ingredients that can be  
98 combined with each other according to § 347.20(a):  
99

- 100 • Allantoin, cocoa butter, cod liver oil, dimethicone, glycerin, hard fat, lanolin,  
101 mineral oil, petrolatum, white petrolatum
- 102 • Aluminum hydroxide gel, calamine, kaolin, zinc acetate, zinc carbonate, zinc  
103 oxide
- 104 • Colloidal oatmeal, mineral oil

105  
106 The active ingredients in each of these groups can be combined only with the other active  
107 ingredients in the same group. Active ingredients in different groups cannot be used in the same  
108 drug product. For example, cocoa butter can be combined with glycerin, but not with aluminum  
109 hydroxide gel.

### **C. Can skin protectant active ingredients be combined with active ingredients from other OTC drug monographs?**

110  
111  
112  
113  
114 Yes, a skin protectant drug product from the first bulleted list above can contain external  
115 analgesic, first aid antiseptic, or sunscreen active ingredients in combination with skin protectant  
116 active ingredients (see §§ 347.20(b), (c), and (d)). Table 1 specifies which skin protectant active  
117 ingredients can be combined with external analgesic, first aid antiseptic, or sunscreen active  
118 ingredients.  
119

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**Table 1. Permitted Combinations of Skin Protectant Active Ingredients with Active Ingredients from Other OTC Drug Monographs**

Skin Protectant Active Ingredients <sup>1</sup>	Other Active Ingredients
Any one (or two if required to be in combination) of the following: allantoin, cocoa butter, cod liver oil, hard fat, lanolin, mineral oil, petrolatum, white petrolatum	With specified <b>external analgesic</b> or <b>first aid antiseptic</b> active ingredients
Any one (or two if required to be in combination) or more of the following: allantoin, cocoa butter, cod liver oil, dimethicone, glycerin, hard fat, lanolin, mineral oil, petrolatum, white petrolatum	With specified <b>sunscreen</b> active ingredients

<sup>1</sup> For ease of reference, this list includes only active ingredient names. Permitted concentrations for skin protectant active ingredients are provided in 21 CFR 347.10. This table also does not address related labeling requirements.

The specific active ingredients that may be combined could be expanded, reduced, or otherwise revised as we complete the rulemakings for OTC external analgesic, first aid antiseptic, and sunscreen drug products. As we complete these three final rules, we will revise the lists of permitted combinations in the skin protectant monograph (§§ 347.20(b), (c), and/or (d)) as needed to ensure consistency among all of these OTC drug monographs. We have issued tentative final monographs for OTC external analgesic and first aid antiseptic drug products (48 FR 5852 and 56 FR 33644, respectively). The tentative final monograph for external analgesic drug products would allow combinations of specified external analgesic active ingredients singly or in combination with specified, single, or combination skin protectant ingredients (proposed 348.20(b)). The tentative final monograph for first aid antiseptic active ingredients allows combinations only of specified, single first aid antiseptic ingredients with single skin protectant ingredients (proposed 333.20(b)).

Until we issue final rules for external analgesic and first aid antiseptic drug products, we do not intend to take enforcement action if an OTC drug product combines external analgesic or first aid antiseptic active ingredients identified in these tentative final monographs with applicable skin protectant active ingredients listed in Table 1 if the drug product is labeled with skin protectant claims (§ 347.60(b)(1) or (2)) and either external analgesic claims (proposed 348.20(b)(1)) or first aid antiseptic claims (proposed 330.60) as appropriate (CPG 450.300).

We stayed the effective date of the final monograph for OTC sunscreen drug products (21 CFR part 352) so that we could address ultraviolet A testing and labeling (66 FR 67485). In 2007, we proposed revisions to this monograph, including a revision to add two more permissible combinations of sunscreen active ingredients with skin protectant active ingredients (72 FR 49070). Until a final monograph for OTC sunscreen drug products becomes effective, we do not intend to take enforcement action if an OTC drug product contains combinations of any sunscreen active ingredients identified in § 352.10 (including those proposed in 2007) with the applicable skin protectant active ingredients listed in Table 1 if the drug product is labeled with claims in § 347.60(b)(3) and § 352.60(b).

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157 **D. Are there any ingredients that cannot be used as skin protectant active**  
158 **ingredients?**

159  
160 Yes. The only ingredients that can be used as skin protectant active ingredients are those listed  
161 in § 347.10. Other active ingredients that have been used in OTC skin protectant drug products  
162 are listed in 21 CFR 310.545(a)(18). We have not received sufficient data to establish that the  
163 ingredients in 21 CFR 310.545(a)(18) are GRASE. Therefore, these ingredients are not  
164 permitted as skin protectant active ingredients under the monograph.

165  
166

167 **IV. LABELING FOR OTC SKIN PROTECTANT DRUG PRODUCTS**

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169

170 **A. What are the general labeling content and format requirements?**

171  
172

173 General labeling requirements for drug products are provided in 21 CFR part 201 and part 330,  
174 subpart A. After the tentative final monograph for OTC skin protectant drug products was  
175 published in 1983, we issued a 1999 final rule standardizing the content and format for labeling  
176 OTC drug products (64 FR 13254). Among other changes, the final rule revised 21 CFR part  
177 201 to include § 201.66, which requires that OTC drug products include a Drug Facts box  
178 containing each active ingredient and corresponding purpose (statement of identity), indications,  
179 warnings, directions, and other information.

180  
181

182 The attachment to this guidance provides a sample Drug Facts box for an OTC skin protectant  
183 drug product that would comply with the requirements of § 201.66 and the other regulations  
184 described in this guidance. Additional guidance on labeling of OTC drug products can be found  
185 on our Web site (<http://www.fda.gov/cder/guidance/index.htm>).

186  
187

188 **B. What is the appropriate statement of identity (*Purpose*) for my drug**  
189 **product?**

190  
191

192 The statement of identity must appear on the principal display panel according to § 201.61 and  
193 must include the established name, if any, and the general pharmacological category(ies) or the  
194 principal intended action(s). The established name also must appear in the Drug Facts box under  
195 the *Active ingredient* heading. The general pharmacological category(ies) or the principal  
196 intended action(s) also must appear in the Drug Facts box under the *Purpose* heading, in  
197 accordance with §§ 201.66(c)(2) and (3), respectively.

198  
199

200 In addition, every OTC skin protectant drug product must include one or more of the following  
specified descriptors in the statement of identity:

201  
202

- Any OTC skin protectant drug product may include “skin protectant” in the statement of identity (§ 347.50(a)(1)).
- An OTC skin protectant formulated as a lip protectant may include “lip protectant” or “lip balm” (§ 347.50(a)(2)).



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- 201 • Those OTC skin protectant drug products containing the following six active ingredients  
202 may include “poison ivy, oak, sumac drying”: aluminum hydroxide gel, calamine, kaolin,  
203 zinc acetate, zinc carbonate, and zinc oxide (§ 347.50(a)(3)).  
204 • OTC skin protectant drug products containing any of the above six active ingredients, or  
205 colloidal oatmeal or sodium bicarbonate, may include “poison ivy, oak, sumac  
206 protectant” (§ 347.50(a)(4)).  
207

208 The statement of identity for any OTC skin protectant drug product also may include the dosage  
209 form. For example, the statement of identity for a lotion containing cocoa butter could be either  
210 “skin protectant” or “skin protectant lotion” (§ 347.50(a)(1)).  
211

### 212 C. What are the appropriate indications (*Uses*) for my drug product?

213  
214 The indication(s) must appear in the Drug Facts box under the *Uses* heading in accordance with  
215 §§ 201.66(c)(4) and 347.50(b). Table 2 provides skin protectant indication statements that can  
216 be made under the *Uses* heading, including optional language for certain active ingredients.<sup>3</sup>  
217 Skin protectant indication statements are included in the labeling whenever a skin protectant  
218 active ingredient is present in a drug product, whether as a single active ingredient or in  
219 combination with other skin protectant, external analgesic, first aid antiseptic, or sunscreen  
220 active ingredients (see sections III.B. and C.).  
221

222 **Table 2. Skin Protectant Indications**  
223

Skin Protectant Active Ingredients <sup>1</sup>	Indications ( <i>Uses</i> ) <sup>2</sup>
allantoin, cocoa butter, cod liver oil, hard fat, lanolin, mineral oil, petrolatum, white petrolatum	<ul style="list-style-type: none"><li>temporarily protects minor cuts</li><li>scrapes</li><li>burns</li></ul>
allantoin, cocoa butter, cod liver oil, dimethicone, glycerin, hard fat, lanolin, mineral oil, petrolatum, white petrolatum	<p><b><u>If not formulated and labeled as a lip protectant:</u></b></p> <ul style="list-style-type: none"><li><i>helps prevent and temporarily protects and helps relieve chafed, chapped or cracked skin and lips</i></li></ul>
	<p><b><u>If formulated and labeled as a lip protectant:</u></b></p> <ul style="list-style-type: none"><li>temporarily protects <i>and helps relieve chafed, chapped or cracked lips</i></li></ul>
	<p><b><u>Optional for both:</u></b></p> <ul style="list-style-type: none"><li><i>helps prevent and protect from the drying effects of wind and cold weather<sup>3</sup></i></li></ul>

<sup>3</sup> Other truthful and nonmisleading statements, describing only the uses that have been established and listed in 21 CFR 347.50(b), also may be used as provided in 21 CFR 330.1(c)(2).

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Skin Protectant Active Ingredients <sup>1</sup>	Indications (Uses) <sup>2</sup>
cocoa butter, petrolatum, white petrolatum <i>not</i> marketed as a lip protectant	<b>Select one of the following:</b> <sup>3</sup> <ul style="list-style-type: none"><li>• Use helps protect minor cuts and burns</li><li>• Use helps <i>prevent and</i> protect chapped skin</li><li>• Use helps protect minor cuts and burns and <i>prevent and protect</i> chapped skin</li></ul>
aluminum hydroxide gel, calamine, kaolin, zinc acetate, zinc carbonate, zinc oxide	<ul style="list-style-type: none"><li>• dries the oozing and weeping of poison: • ivy<ul style="list-style-type: none"><li>• oak</li><li>• sumac</li></ul></li></ul>
colloidal oatmeal	<ul style="list-style-type: none"><li>• temporarily protects and helps relieve minor skin irritation and itching due to: [<b>select one or more of the following:</b>]<sup>4</sup> • rashes • eczema • poison ivy, oak, or sumac • insect bites</li></ul>
sodium bicarbonate	<ul style="list-style-type: none"><li>• temporarily protects and helps relieve minor skin irritation and itching due to:<ul style="list-style-type: none"><li>• poison ivy, oak, or sumac</li><li>• insect bites</li></ul></li></ul>
topical starch	<ul style="list-style-type: none"><li>• temporarily protects and helps relieve minor skin irritation</li></ul>
colloidal oatmeal combined with mineral oil	<ul style="list-style-type: none"><li>• temporarily protects and helps relieve minor skin irritation and itching due to: [<b>select one of the following:</b>]<sup>4</sup> • rashes • eczema</li></ul>

224 <sup>1</sup> For ease of reference, this list includes only active ingredient names. Permitted concentrations for skin  
225 protectant active ingredients are provided in 21 CFR 347.10.

226 <sup>2</sup> Bolded, underlined language and bolded language in brackets is explanatory; not to be included in  
227 labeling. Italicized language is optional.

228 <sup>3</sup> This entire bulleted statement is optional. If this statement is not included in labeling, do not place a  
229 bullet before the remaining statement.

230 <sup>4</sup> If only one term is used, do not use a bullet.

231

### 232 **D. What are the appropriate *Warnings* for my drug products?**

233

234 There are a few warnings that are required in the labeling of OTC skin protectant drug products  
235 (§§ 201.66(c)(5) and 347.50(c)). The skin protectant active ingredient and, in some cases, the  
236 labeled indication (as shown in Table 3) determine which warnings are required.

237

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**Table 3. Skin Protectant Warnings**

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239

<b>Active Ingredients and Indications<sup>1</sup></b>	<b>Warnings</b>
all active ingredients <i>except</i> <ul style="list-style-type: none"> <li>• cocoa butter, petrolatum, or white petrolatum,<sup>2</sup></li> <li>• those formulated and labeled as lip protectants that meet the criteria in § 201.66(d)(10)</li> </ul>	<b>When using this product</b> <ul style="list-style-type: none"> <li>• do not get into eyes</li> </ul> <b>Stop use and ask a doctor if</b> <ul style="list-style-type: none"> <li>• condition worsens</li> <li>• symptoms last more than 7 days or clear up and occur again within a few days</li> </ul>
cocoa butter, petrolatum, or white petrolatum <i>not</i> marketed as a lip protectant	<ul style="list-style-type: none"> <li>• Do not get into eyes</li> <li>• See a doctor if condition lasts more than 7 days</li> <li>• <b>Do not use on</b> <ul style="list-style-type: none"> <li>• deep or puncture wounds</li> <li>• animal bites</li> <li>• serious burns</li> </ul> </li> </ul>
allantoin, cod liver oil, dimethicone, glycerin, hard fat, lanolin, mineral oil <i>except</i> if they are formulated and labeled as a lip protectant that meets the criteria in § 201.66(d)(10)	<b>Do not use on</b> <ul style="list-style-type: none"> <li>• deep or puncture wounds</li> <li>• animal bites</li> <li>• serious burns</li> </ul>
all active ingredients <i>not</i> formulated and labeled as a lip protectant that meets the criteria in § 201.66(d)(10)	<b>Keep out of reach of children.</b> If swallowed, get medical help or contact a Poison Control Center right away.
all active ingredients <i>except</i> <ul style="list-style-type: none"> <li>• mineral oil or sodium bicarbonate if labeling for oral use is included</li> <li>• cocoa butter, petrolatum, or white petrolatum<sup>2</sup></li> <li>• if drug product is formulated and labeled as a lip protectant that meets the criteria in § 201.66(d)(10)</li> </ul>	<b>For external use only</b>
kaolin or topical starch in powder products	<b>Do not use</b> <ul style="list-style-type: none"> <li>• on broken skin</li> </ul> <b>When using this product</b> <ul style="list-style-type: none"> <li>• keep away from face and mouth to avoid breathing it</li> </ul>
colloidal oatmeal labeled for use as a soak in a tub	<b>When using this product</b> <ul style="list-style-type: none"> <li>• to avoid slipping, use mat in tub or shower</li> </ul>
colloidal oatmeal or sodium bicarbonate labeled for use as soak, compress, or wet dressing	<b>When using this product</b> <ul style="list-style-type: none"> <li>• in some skin conditions, soaking too long may overdry</li> </ul>

240  
241  
242  
243  
244

<sup>1</sup> For ease of reference, this list includes only names of active ingredients. Permitted concentrations for skin protectant active ingredients are listed in § 347.10.

<sup>2</sup> Use these warnings if drug product contains other active ingredients in addition to cocoa butter, petrolatum, or white petrolatum.

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245 **E. What are the appropriate *Directions* for my drug product?**

246  
247 The directions for an OTC skin protectant drug product are determined by the active ingredient  
248 and by dosage form for colloidal oatmeal and sodium bicarbonate, as described in Table 4.

249  
250 If specific directions are not listed in Table 4 for a particular active ingredient, the directions are  
251 “apply as needed,” in accordance with § 347.50(d).

252  
253 **Table 4. Skin Protectant Directions**

254

Active Ingredients and Dosage Form <sup>1</sup>	Directions <sup>2</sup>
colloidal oatmeal	<p><b><u>For products requiring dispersal in water:</u></b></p> <ul style="list-style-type: none"><li>• turn warm water faucet on to full force</li><li>• slowly sprinkle (insert amount) of colloidal oatmeal directly under the faucet into the tub or container<sup>3</sup></li><li>• stir any colloidal oatmeal settled on the bottom</li></ul> <p><b><u>For products to be used as a soak in a bath:</u></b><sup>4</sup></p> <p>For use as a soak in a bath:</p> <ul style="list-style-type: none"><li>• soak affected area for 15 to 30 minutes as needed, or as directed by a doctor</li><li>• pat dry (do not rub) to keep a thin layer on the skin</li></ul> <p><b><u>For products to be used as a compress or wet dressing:</u></b><sup>4</sup></p> <p>For use as a compress or wet dressing:</p> <ul style="list-style-type: none"><li>• soak a clean, soft cloth in the mixture</li><li>• apply cloth loosely to affected area for 15 to 30 minutes</li><li>• repeat as needed or as directed by a doctor</li><li>• discard mixture after each use</li></ul>
sodium bicarbonate	<ul style="list-style-type: none"><li>• adults and children 2 years of age and over:</li></ul> <p><b><u>For products to be used as a soak in a bath:</u></b></p> <p>For use as a soak in a bath:</p> <ul style="list-style-type: none"><li>• dissolve 1 to 2 cupfuls in a tub of warm water</li><li>• soak for 10 to 30 minutes as needed, or as directed by a doctor</li><li>• pat dry (do not rub) to keep a thin layer on the skin</li><li>• children under 2 years: ask a doctor</li></ul>

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Active Ingredients and Dosage Form <sup>1</sup>	Directions <sup>2</sup>
sodium bicarbonate (continued)	<p data-bbox="790 268 1349 331"><b><u>For products to be used as a compress or wet dressing:</u></b></p> <p data-bbox="790 369 1240 401">For use as a compress or wet dressing:</p> <ul data-bbox="810 407 1386 680" style="list-style-type: none"><li>• add sodium bicarbonate to water to make a mixture in a container</li><li>• soak a clean, soft cloth in the mixture</li><li>• apply cloth loosely to affected area for 15 to 30 minutes</li><li>• repeat as needed or as directed by a doctor</li><li>• discard mixture after each use</li><li>• children under 2 years: ask a doctor</li></ul> <p data-bbox="790 718 1222 749"><b><u>For products to be used as a paste:</u></b></p> <p data-bbox="790 787 1003 819">For use as a paste:</p> <ul data-bbox="810 825 1386 989" style="list-style-type: none"><li>• add enough water to the sodium bicarbonate to form a paste</li><li>• apply to the affected area of the skin as needed, or as directed by a doctor</li><li>• children under 2 years: ask a doctor</li></ul>
aluminum hydroxide gel	<ul data-bbox="810 1037 1252 1068" style="list-style-type: none"><li>• children under 6 months: ask a doctor</li></ul>
glycerin	<ul data-bbox="810 1115 1252 1146" style="list-style-type: none"><li>• children under 6 months: ask a doctor</li></ul>
zinc acetate	<ul data-bbox="810 1178 1230 1209" style="list-style-type: none"><li>• children under 2 years: ask a doctor</li></ul>

255 <sup>1</sup> For ease of reference, this list includes only active ingredient names. Permitted concentrations for skin  
256 protectant active ingredients are provided in 21 CFR 347.10.

257 <sup>2</sup> Bolded, underlined language is explanatory and not to be included in labeling.

258 <sup>3</sup> Parentheses mark insertion point for colloidal oatmeal amount and should not be included in labeling.

259 <sup>4</sup> Manufacturer also must include adequate directions to obtain solution with appropriate concentration of  
260 colloidal oatmeal in accordance with 21 CFR 347.50(d)(2)(A) and (B).

261

262

### 263 V. SPECIAL LABELING REQUIREMENTS OR EXCEPTIONS FOR SKIN 264 PROTECTANT DRUG PRODUCTS

265

#### 266 A. Are lip protectants with small packaging allowed reduced labeling?

267

268 Yes, OTC lip protectant drug products are allowed reduced labeling if marketed in small  
269 packages with space limitations specified in 21 CFR 201.66(d)(10). Much of this abbreviated  
270 labeling is captured in Tables 2 through 4, but the following list summarizes all otherwise  
271 required labeling that can be omitted for these lip protectants (§ 347.50(e)):

272

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- 273 • *Drug Facts* title
- 274 • *Purpose* heading and related information
- 275 • All information under *Warnings*
- 276 • *Directions* heading and related information
- 277 • *Other information* heading
- 278 • Horizontal barlines and hairlines described in § 201.66(d)(8)

279  
280 In addition, the *Uses* heading and indication statement may be reduced to the following: “**Use**  
281 helps *prevent*, protect, and *relieve* chapped lips” (italicized language is optional). The active  
282 ingredients should be listed in alphabetical order.

283  
284 **B. Are skin protectant drug products containing cocoa butter, petrolatum,**  
285 **and/or white petrolatum allowed reduced labeling?**  
286

287 Yes, OTC skin protectant drug products containing cocoa butter, petrolatum, or white petrolatum  
288 as a single active ingredient or in combination with each other are allowed reduced labeling as  
289 specified in 21 CFR 347.50(f). Much of this reduced labeling is captured in Tables 2 through 4,  
290 but the following lists summarize all otherwise required labeling that can be omitted or reduced  
291 for these drug products (§ 347.50(f)):

292  
293 The following labeling may be omitted:

- 294
- 295 • *Purpose* heading and related information
- 296 • **For external use only**
- 297 • *Other information* heading and related information

298  
299 *Uses* heading and indication statement may be reduced to one of the following statements  
300 (italicized language is optional):

- 301
- 302 • “**Use** helps protect minor cuts and burns”
- 303 • “**Use** helps *prevent and* protect chapped skin”
- 304 • “**Use** helps protect minor cuts and burns and *prevent and protect* chapped skin”

305  
306 As stated in § 347.50(f)(1)(iii) and (iv), *Warnings* must contain the following shortened  
307 statements or the corresponding full-length statements listed in § 347.50(c):

- 308
- 309 • “*See a doctor* if condition lasts more than 7 days”
- 310 • “**When using this product** do not get into eyes”
- 311 • “**Do not use on** • deep or puncture wound • animal bites • serious burns”

312  
313 The active ingredients should be listed in alphabetical order.

314

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315           **C.     What are the labeling requirements for skin protectant drug products**  
316           **containing active ingredients from other OTC drug monographs?**  
317

318 Table 1 lists the skin protectant active ingredients that may be combined with active ingredients  
319 from other OTC drug monographs, specifically external analgesic, first aid antiseptic, and  
320 sunscreen active ingredients. If skin protectant active ingredients are combined with active  
321 ingredients from these specified OTC drug monographs, the labeling requirements of each  
322 applicable OTC drug monograph must be met.  
323

324 However, as set forth in § 347.60, labeling statements can be combined to eliminate duplicative  
325 words and phrases to produce clear, understandable statements that include all required  
326 information.<sup>4</sup> In some cases, there may be conflicting dosing directions such as different time  
327 intervals between doses or different minimum age limits. In such situations, the directions must  
328 not include a dosage that exceeds the dosage established for any individual active ingredient, and  
329 the minimum age limit must be the highest established for any individual active ingredient. For  
330 example, if one active ingredient can be used by children 12 years of age and over while another  
331 active ingredient can be used by children 6 years of age and over, then the drug product should  
332 be labeled for use by children 12 years of age and over.  
333

334 Cosmetic ingredients and skin protectant active ingredients may be combined in a single product  
335 as long as cosmetic ingredients and drug active ingredients are listed separately. All of the  
336 cosmetic ingredients appear under the *Inactive ingredients* heading in the Drug Facts box, in the  
337 manner set forth in 21 CFR 201.66(c)(8) and 701.3(d). However, any cosmetic claims should  
338 appear outside the Drug Facts box.  
339

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<sup>4</sup> When we issued the final rule for OTC skin protectant drug products in 2003, we lifted the stay on the sunscreen final rule (21 CFR part 352) and amended the sunscreen rule to include sunscreen-skin protectant combination drug products. In the same 2003 final rule, we then reinstated the stay on part 352 and also stayed § 347.20(d), the provision of the skin protectant monograph addressing combination sunscreen-skin protectant drug products. As discussed above, we published a proposed rule in 2007 to revise the sunscreen monograph. In the 2007 proposed rule, we propose that the stays of both part 352 and § 347.20(d) be lifted when that proposed rule is finalized. Accordingly, we currently intend to maintain these stays until a final rule based on the 2007 sunscreen proposed rule becomes effective. In the interim, sunscreen manufacturers are encouraged, but not required, to adhere to the regulations set forth in part 352 and § 347.20(d), as revised in the 2007 sunscreen proposed rule, regarding combinations of skin protectant and sunscreen active ingredients.

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**ATTACHMENT: HAND LOTION CONTAINING 25% DIMETHICONE**

<b>Drug Facts</b>	
<b>Active ingredients</b>	<b>Purpose</b>
Dimethicone, 25%.....	Skin Protectant
<b>Uses</b>	
<ul style="list-style-type: none"><li>temporarily protects and helps relieve chapped or cracked skin</li><li>helps protect from the drying effects of wind and cold weather</li></ul>	
<b>Warnings</b>	
<b>For external use only</b>	
<b>Do not use on</b>	
<ul style="list-style-type: none"><li>deep or puncture wounds</li><li>animal bites</li><li>serious burns</li></ul>	
<b>When using this product</b>	
<ul style="list-style-type: none"><li>do not get into eyes</li></ul>	
<b>Stop use and ask a doctor if</b>	
<ul style="list-style-type: none"><li>condition worsens</li><li>symptoms last more than 7 days or clear up and occur again within a few days</li></ul>	
<b>Keep out of reach of children.</b> If swallowed, get medical help or contact a Poison Control Center right away.	
<b>Directions</b>	
<ul style="list-style-type: none"><li>apply as needed</li></ul>	
<b>Other information</b>	
<ul style="list-style-type: none"><li>store at 20-25°C (68-77°F)</li></ul>	
<b>Inactive ingredients</b> [list of inactive ingredients in alphabetical order]	
<b>Questions or comments?</b> call toll free 1-800-xxx-xxxx	

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**Note:** Font, font size, and font attributes (e.g., bold) shown above comply with Drug Facts format specifications in 21 CFR 201.66(d).