

Technical Editor
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The borderline between drugs and cosmetics is always a fine line with many areas of grey. The MHRA (formerly the MCA) are reviewing the guidance note they have produced (GN8 Guidance Note) and should have this task completed some time this year. These are notes from a Management Forum Workshop July 2005.

Adverse Medical Conditions

They have defined these as eczema, dermatitis and psoriasis, spots, sores, acne and boils, bites, burns (all types) and scalds, stings, bumps and bruises, grazes, cuts, nappy rash and other rashes, inflammation, fungal infections, chapped or cracked lips or skin, styes, alopecia, varicose veins, headlice and chilblains, etc.

Other claims (not usually medicinal)

There are claims that they are not quite so worried about, like anti-wrinkle, anti-cellulite, anti-aging, anti-dandruff, anti-snoring and words like soften, moisturises, hydrates etc. They also seem to be quite happy with things like age spots, freckles and liver spots. Even words like medicated and antiseptic in certain contexts would be accepted.

Borderline Claims

Anti-itch, (antipruritic), anti-redness (anti-erythema), anti-scaling and anti-flaking may also be used, as long as the product claims do not step over the line and into the medicinal drug area.

Recommended Phrases

The most interesting and useful development is likely to be the provision of some useful phrases like: “also suitable (or safe) for people who may be prone to – (eczema / psoriasis / dermatitis)” and “protects against – the conditions that may cause/the causes of... (e.g. nappy rash)” or “kills the bacteria that may cause/lead to ... (e.g. spots)”. Finally, with things like muscle rubs the pack copy should concentrate on the act and function of massage.