



Sunscreen Secondary Claims

What Else Can I Claim?

Apart from the above regulated claims, marketers of sunscreens make additional non-standardised or non-harmonised performance claims for sunscreen products.

Caution is advised where additional claims are made for Primary Sunscreens in Australia. These products are classified as lower scrutiny Listable (AUST L) but this status can change to fully registerable if claims related to additional ingredients are made. For this reason, claims related to added “actives” are not included below.

Safety

Human Repeat Insult Patch Testing, or 48 hr Patch Testing, are safety tests which should not be confused with efficacy claims. Higher level of safety claims can be “Sensitive Skin” RIPT and “Dermatologist Certified”.

Suitable for Sensitive skin - Baby or Children's Formula

This is supportable by selection of a self-nominated sensitive skin test panel in the RIPT test described above.

Sweat Resistance

In USA, FDA recognises water resistance testing as equivalent to sweat resistance. That is, for “Sweat Resistance”, the post immersion SPF value from a 40 min water resistance test could be claimed. The same applies for Canada

Sweat Resistance can also be supported by SPF testing

following a prescribed period of persistent sweating, induced in a high temp and humidity chamber, or by extended exercise e.g. exercise bike. The period should be nominated – 40 min or 80 min. Testing beyond this period involves high risk to the test volunteers.

Sand Resistance

A frustration associated with many formulations, particularly water in oil emulsions, or those containing film formers, is stickiness. A simple test can be performed to qualify a claim for comparative sand resistance. A benchmark should be used as a comparator. As far as the author is aware, no formulation will completely resist sand pickup. This claim can be extended to include “easy brush off”.

Photo-stability

This remains undefined. An attempt was made at ISO Technical Committee TC 217 to introduce a test method which could arrive at an ISO Standard. However, this was rejected in 2013 as no national member had a published method upon which an international one might be modeled. The term remains unqualified from a test method point of view and a rationale for the claim is left to the marketer of that claim.

Wet Skin Application

This claim can be supported by a test protocol incorporating the application of the test product to “wet” skin, induced by the water immersion of the test

Protection. Although some marketers are suggesting this, it runs counter to the mandated requirement in several standards to the effect that the product should be reapplied every two hours, after swimming or after toweling. This requirement is necessary because standard SPF testing does not include high physical water based activity nor any other friction challenge.

Non Run

The rheology of formulations can be constructed so as to direct the product to remain in the area of application, without spreading beyond this area. This can be an important formulation attribute in order to avoid product running into the eyes after application to the scalp.

The claim is more difficult to support under SPF application conditions, as the application rate is 2 mg/ sq cm, which is around twice as high as typical application rate in use. Comparative testing is useful in maximising this formulation property.

Non Eye Sting

Eye sting is reported for many sunscreens. This is mostly a function of the actives selected for the formulation, but can be aggravated by other ingredients. The “No eye sting” claim is expensive to support, however Ophthalmologist certification provides higher credibility.

Tanning

The addition of a chemical tanner can be supported by efficacy study involving spectrophotometric measurement of skin colour change. Intensity and persistence can be evidenced by an erythema regression study.

Extreme

With the move to SPF 50+ and higher UVA protection, the “extreme” formulation claim probably needs to be a total of SPF of at least 60 + UVAPF of more than 0.5 + 4 hr Water (and sweat) resistance + high friction resistance. Such formulations find market support in the extreme sports environment – cycling, long distance eventing – extended session surfing.

Negative Claims

Nano free - Not Tested on Animals – “chemical” free - paraben free. These are all inherent attributes of formulating and not usually subject to testing. It should be noted that E.U. has recently moved towards banning negative statements on labeling.

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