



Understanding the FDA's Proposed Rule for Sunscreens

In February 2019, the FDA issued suggested sunscreen guidelines in a Proposed Rule, as part of their work to finalize the Sunscreen Monograph by November 2019. They are asking for public comments on their proposals before **June 27, 2019**. We are recapping key points of the proposals and including our feedback in the following 5 considerations.

1 Higher SPF protects better from sunburn

The Proposed Rule is suggesting a cap at SPF 60+, which would eliminate access to higher SPF products that are valuable for sun protection. This stands in contrast to new science confirming that SPF 100+ provides better protection than SPF 50+ from sunburn¹. Studies have also shown that one bad sunburn increases the risk of developing skin cancer.

An additional consideration is that sunscreen is often underapplied – commonly ¼ to ½ of the amount used to determine the SPF value. Sun protection levels depend on how much sunscreen is applied. In this case, ¼ of the tested amount of an SPF 30 sunscreen will provide only SPF 7.5 protection! Maintaining higher SPF standards can help counteract this problem.

NEUTROGENA® advocates for access to higher protection levels, above the proposed cap of SPF60+. We see this as helping to better serve interests of public health and consumer choice, especially for vulnerable groups like those with fair skin and skin cancer survivors.

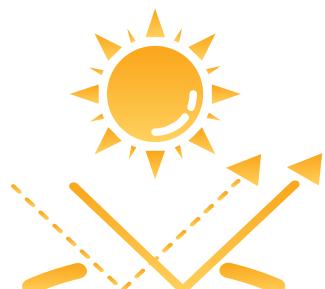


2 Keep wearing your favorite sunscreen

The proposals show no immediate changes to the way sunscreens are formulated, sold or packaged, and your favorite sunscreen will still be available. The 16 UV filters used in the US were approved as safe and effective in the 1990's.

The FDA is asking manufacturers to share more data on some of the approved filters, 6 of which are in our products today.

NEUTROGENA® maintains that the sunscreen ingredients we use are safe and effective, and will provide our data to the FDA.



③ Spray Away

The FDA proposes that spray sunscreens be included in the Final Sunscreen Monograph, along with oils, lotions, creams, gels, butters, pastes, ointment and sticks.

NEUTROGENA® offers a broad range of sunscreen forms -- including sprays, sticks and lotions, as well as formulas for acne-prone skin, sport activity and wet skin -- so that everyone can find a sunscreen they love to wear.

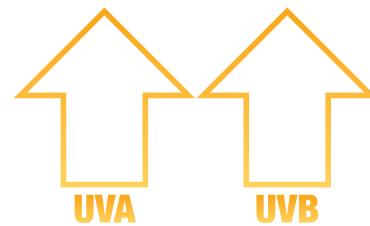


④ Place your bet on broad spectrum

The FDA proposes that all sunscreens SPF15 and higher must provide broad spectrum (UVA/UVB) protection.

They also suggest that as the SPF (UVB protection) increases, the UVA protection must also increase.

All NEUTROGENA® sunscreens provide broad spectrum protection. Knowing UVA rays are the most prominent year-round, and responsible for long-term cumulative exposure, we set a high bar for UVA protection in all formulas.



⑤ Read the label

Sunscreen labels have good information to help people make decisions about which formulas are right for their lifestyle.

The FDA suggests companies move active ingredients (filters) to the **front label**, with a stronger focus on SPF, broad spectrum and water resistance claims.

NEUTROGENA® supports updating labels to help people make their sunscreen decisions easily.



1 Williams JD, et. al, SPF100+ sunscreen is more protective against sunburn than SPF50+ in actual-use: Results of a randomized double-blind, split-face, natural sunlight exposure clinical trial, *Journal of the American Academy of Dermatology* (2018), doi: 10.1016/j.jaad.2017.12.062