**Antimicrobial hand sanitisers and gels**

**All hand cleansing and sanitising products are regulated in the UK**

Hand sanitising products generally fall into one of three categories depending on the products’ intended use, function, composition or how they are described:

* Products primarily used to clean, protect, and condition skin or any other cosmetic enhancement while providing a secondary antimicrobial effect, such as a liquid soap, solid soap bars, sun lotion and moisturising hand creams. These are classed as a **cosmetic product**.
* Products primarily claiming to kill germs, disinfect or sanitise using an active antimicrobial ingredient such as the hand sanitisers used in the work environment. These are classed as a **biocide**.
* Products specifically used as surgical scrubs for use in operating theatres and products which make claims to treat and / or prevent infection associated with specifically named pathogens. These are classed as **medicines**.

For hand gels and sanitisers they may be a cosmetic, a biocide or even a medicine. For such ‘borderline products’, the decision on a product’s classification must be taken on a case-by-case basis and will depend on the product’s primary function, presentation and claims.

**Cosmetic Products**

The Cosmetic Products Enforcement Regulations 2013 apply and are enforced by the Local Council Environmental Health Department. Please contact eh@fermanaghomagh.com for further advice.

Guidance for cosmetic products <https://www.businesscompanion.info/en/quick-guides/product-safety/cosmetic-products>

Related trade association The Cosmetic, Toiletry and Perfumery Association <https://www.ctpa.org.uk/>

**Biocide Products**

A biocidal product must comply with the [EU Biocidal Products Regulation](https://echa.europa.eu/regulations/biocidal-products-regulation/legislation) and are enforced by Health and Safety Executive for Northern Ireland. Contact HSENI’s biocides helpdesk at biocidesenquiries@hse.gov.uk for further advice.

Guidance for biocides

HSE - Hand sanitiser products and surface disinfectants during the coronavirus outbreak – use, manufacture and supply <https://www.hse.gov.uk/coronavirus/hand-sanitiser/index.htm>

Coronavirus (COVID-19) manufacture and supply of hand sanitisers <https://www.hse.gov.uk/coronavirus/assets/docs/hand-sanitiser-manufacture-supply-coronavirus.pdf>

**Medical Products**

If a product claims to prevent infection against specific viruses, such as COVID-19 or other named pathogens or illnesses, it will be classed as a medicine.

Marketing Authorisations are required for medicines ([www.gov.uk/topic/medicines-medical-devices-blood/marketing-authorisations-variations-licensing](http://www.gov.uk/topic/medicines-medical-devices-blood/marketing-authorisations-variations-licensing)). Contact the Medicines and Healthcare Products Regulatory Agency (MHRA) at borderline medicine@mhra.gov.uk for information and advice.

**Other Sources of Information**

CTPA-Placing Hand Gels or Sanitisers on the UK market – What You Need to Know

<https://www.ctpa.org.uk/news/placing-hand-gels-or-sanitisers-on-the-uk-market-what-you-need-to-know-4448>

Temporary changes to the use and supply of denatured alcohol and duty-free spirits, to help businesses who produce hand sanitiser and gel.

<https://www.gov.uk/guidance/producing-hand-sanitiser-and-gel-for-coronavirus-covid-19>