### SYCHEMPROTECT FOAM HAND SANITIZER CONCENTRATE

- Effective against MRSA, and Community Associated CA-MRSA
- NSF E3 approved for Food Handlers

### Overview

Sychem Protect Foam Hand Sanitizer is based on the active ingredient Benzalkonium Chloride in a unique non-drying, moisturizing and conditioning formulation. The formula is NSF Approved E3 for no-rinse hand sanitizing, Sychem Protect kills 99.999% of most common germs that may cause illness, including E. Coli and MRSA in just 15 seconds.

Benzalkonium Chloride, which is listed in the Antiseptic monograph as Category III for safety and efficacy. This category allows Benzalkonium chloride based products to be marketed in use patterns that fall within the monograph as long as the formulations conform to the percentage ranges in the monograph, which is 0.1-0.13% for Benzalkonium chloride. As in the case of Ethanol based Instant Hand Sanitizers, Benzalkonium chloride based products qualify for monograph "grandfathering" with a demonstrated use pattern established for a material time and extent prior to December, 1975.

### **Typical Properties**

PHYSICAL FORM BENZALKONIUM CHLORIDE, ACTIVE % ASSAY (EPTON), MEQ/KG PH SPECIFIC GRAVITY @25°C FLASH POINT (PMCC) BIORENEWABLE CARBON, %

### Sychem RTU

LIGHT AMBER LIQUID 0.1 6.1-7.1 4.5-6.5 1.00±0.02 >200°F(>93°C) 76 (COCONUT OIL, PALM KERNEL OIL)

### Handling Information

Note - Manufacturing, Packaging and Marketing of this product may be subject to regulation by the Food and Drug Administration and may be subject to Enforcement Action.

Refer to and follow the guidelines in the Material Safety Data Sheet (MSDS) available from Sychem Ltd for information on the safe use, handling and disposal of this product.



### SYCHEM PROTECT FACT SHEET

Sychem Protect Foam Hand Sanitizer, based on the active ingredient Benzalkonium chloride, is a unique formulation featuring exceptional skin feel, conditioning and moisturizing properties. The efficacy of this product has been confirmed to reduce S. aureus 99.999% in as little as 15 seconds.

Sychem Protect Foam Hand Sanitizer is in compliance with the FDA Final Tentative Monograph for OTC Hand Sanitizer preparations (leave-on sanitizers not requiring a rinse).

Sychem Protect Foaming Hand Sanitizer produces a fast drying, non-sticky foam that contains unique non-drying, conditioning and moisturizing ingredients, leaves the skin with a soft, refreshing and silky after feel, and does not contain polymer thickeners or silicones. We've received numerous questions regarding Sychem and the marketing environment for these types of products. Summarized below are some general answers:

### What are the FDA Regulatory issues relating to Leave-On Antiseptic Products?

One question that folks will have relates to the choice of quat active ingredient, either benzalkonium chloride or benzethonium chloride, and recent issues relating to them. With regard to benzalkonium chloride or benzethonium chloride and the Agency, note that both quats are listed in the Antiseptic monograph as Category III for safety and efficacy. Category III for safety and efficacy means FDA did not have sufficient efficacy and safety information to list them as Category I for hand antisepsis. However, this category allows them to be marketed in products that fall within the monograph as long as the formulations conform to the percentage ranges in the monograph (Benzethonium = 0.1-0.2%; Benzalkonium = 0.1-0.13% - note this is hard to track in the monograph but we have confirmed it with FDA). Sychem Hand Sanitizer is in compliance with 0.1% benzalkonium chloride.

Even though the monograph is tentative, products must follow FDA labeling and manufacturing requirements, but due to case law, the types and extent of efficacy testing is not being enforced. While Tally Environmental Care has generated formulation specific efficacy data confirming Sychem Foam Hand Sanitizer and is generating additional formulation specific efficacy data to support Sychem within industry practice guidelines, we may be required to generate additional efficacy data when the Monograph becomes final.

Now, the real issue is that FDA does not feel that the 1994 TFM includes hand sanitizers (e.g. waterless or leave-on products). Though there are many paragraphs within the monograph that suggest otherwise, this is the stance of the Office of Enforcement. So, today, you can market a quat wash-off product within the above ranges and complying with the above regulations without concern. However, since the hand sanitizer use pattern is not part of the monograph in the eyes of Office of Enforcement, the product may only be on the monograph with an NDA or if it qualifies for what is called "grandfathering". A product may be grandfathered, if records can be shown that it was in the market for a material time and extent prior to December, 1975. Enforcement did the research to prove that this was true for ethanol hand sanitizers thus they are "grandfathered". Recently, FDA enforcement staff shared with us that they have been shown information to allow grandfathering of IPA, IPA and Ethanol combinations, and benzalkonium chloride. Benzalkonium chloride "grandfathering" has been confirmed, and FDA enforcement staff verbally stated to us that thus they plan no further regulatory action against waterless benzalkonium products that comply with the other items listed above.

### Why Benzalkonium chloride based Hand Sanitizers?

**History** - Benzalkonium chloride is an alcohol-free antimicrobial compound that has been widely used in the health care industry for more than 60 years in formulas for preservatives, surface cleaners, sterilizing agents, and leave-on, FDA Monograph anti-bacterial skin treatment products. The chemical properties of benzalkonium chloride make it a good candidate for persistent antimicrobial activity in mammalian tissue.

EJ Singer, "Biological evaluation," in Cationic Surfactants: Analytical and Biological Evaluation, ed. J Cross, EJ singer (New York: Marcel Dekker, 1994) 29; RS Boethling, "Environmental aspects of cationic surfactants," in Cationic Surfactants: Analytical and Biological Evaluation, ed. J Cross, EJ Singer (New York: Marcel Dekker, 1994) 95-135; J Cross, "Introduction to cationic surfactants," in Cationic Surfactants: Analytical and Biological Evaluation, ed. J Cross, EJ Singer (New York: Marcel Dekker, 1994) 4-28.

**Effectiveness** - Benzalkonium chloride-based leave-on Hand Sanitizers have demonstrated efficacy in real-world environments. When evaluated in Elementary School environments where the importance of proper hygiene practices including hand washing is taught and emphasized, the use of non-alcohol benzalkonium chloride-based leave-on instant hand sanitizers reduced illness absenteeism 30-40% in double-blind, placebo-controlled studies versus hand washing alone.

DL Dyer, AL Shinder & FS Shinder (2000). Alcohol-free instant hand sanitizer reduces illness absenteeism. Family Medicine, 32(9), 633-638; CG White, FS Shinder, AL Shinder & DL Dyer (2001). Reduction of Illness Absenteeism in Elementary Schools Using an Alcohol-free Instant Hand Sanitizer. The Journal of School Nursing, 17(5), 258-265.

### What are the advantages of Benzalkonium chloride-based over Alcohol-based Hand Sanitizers?

Benzalkonium chloride based Hand Sanitizers have several distinct advantages over alcohol-based hand sanitizers. While both product forms are FDA Monograph for leave-on products, fast acting and allow for use without water or towels, benzalkonium chloride based products are non-flammable, non-damaging to skin, are persistent, and will not stain clothing or flooring.

**Safety** - Sychem benzalkonium chloride-based instant Hand Sanitizer is non-flammable. An internet search for alcohol-based Hand Sanitizers and fire will produce multiple hits. Flash fires associated with use of alcohol-based hand hygiene products can have potentially severe consequences for health care workers and their patients. A published example reported an incidence of flash fire associated with the use of an alcohol-based hand antiseptic agent. The fire occurred when a spark of static electricity ignited the alcohol-based hand gel on the hand of a health care worker who had just removed a 100% polyester gown. The health care worker put the pre-measured amount of alcoholbased hand gel in the palm of her hand from a wall-mounted dispenser. She then removed the 100% polyester gown, placed it on a metal surface, and began rubbing the gel onto both hands. While her hands were damp, she pulled open a metal sliding door, heard an audible static spark, saw a flash of light, and experienced spontaneous flames on the palm of one hand. After the incident, the palm showed redness but no blisters. Flames singed the hair on her arm.

KA Bryant, J Pearce & B Stover (2002). Flash fire associated with the use of alcohol-based antiseptic agent. American Journal of Infection Control, 30 (June 2002), 256-257.

**Skin Irritation** - Alcohol-based hand sanitizers are effective for occasional use, but long-term, frequent use of the alcohol products can cause skin irritation. Alcohol solubilizes and strips away sebum and lipids that guard against bacterial infections of the skin. Extensive use of alcohol-based hand sanitizers actually increases the skin's susceptibility to infection by transient disease-causing bacteria. This situation can increase the chances of spreading disease-causing microorganisms among patients.

SC Harvey, "Antiseptics and disinfectants; fungicides; ectoparasiticides," in Goodman and Gilman's The Pharmacological Basis of Therapeutics, sixth ed., AG Gilman, LS Goodman, A Gilman eds. (New York: Macmillan Publishing, 1980) 964-987; GL Grove, CR Zerweck, JM Heilman (2000). Comparison of skin condition in a 5-day healthcare personnel hand washing using a new ethanol-emollient waterless antiseptic versus Purell or water. Atlanta, GA. Paper presented at the Centers of Disease Control 4th Decennial International Conference on Nosocomial and Healthcare-associated Infections. Abstracts P-S1-62.

**Effectiveness and residual activity -** Alcohol-based hand sanitizers stop working the instant they dry. The leading manufacturer of alcohol-based hand sanitizers claims that their product kills 99.99% of most common germs that may cause disease in as little as 15 seconds. Alcohol-based hand sanitizers dry in 8-10 seconds, and fall below the efficacious concentration of alcohol in seconds. It has been reported that alcohol-based hand sanitizers offer no residual protection, and that if your hands feel dry after rubbing them together for 15 seconds, an insufficient volume of alcohol gel was likely applied(1). Sychem benzalkonium chloride-based hand sanitizer dries fast, but 10-15 seconds slower than alcohol-based hand sanitizers allowing more than the minimum contact time for complete efficacious coverage, including under fingernails. Additionally, benzalkonium chloride-based hand sanitizers deliver 2 to 4 hours of residual protection.

Published studies report that benzalkonium chloride-based hand sanitizers demonstrated greater sustained antibacterial activity than gelled alcohol-based hand sanitizers that actually became less effective with repeated use and made the skin dirtier, not cleaner due to removal of protective natural skin oils and entrapment of dead skin cells by the polymer thickeners used in the gelled alcohol-based products.

In the referenced study to simulate repeated usage, alcohol-based and alcohol-free benzalkonium chloride-based hand sanitizers were compared. In the study, subject's hands were repeatedly inoculated with bacteria followed by application of hand sanitizer, then evaluated for antimicrobial effectiveness. The antimicrobial efficacy of the alcohol-based hand sanitizer showed a markedly decreased antimicrobial efficacy with subsequent contamination and decontamination cycles, whereas the alcohol-free benzalkonium chloride-based hand sanitizer showed a steady increase in antibacterial efficacy.

In addition to these objective results, subjects were asked to subjectively evaluate the condition of their hands after the completion of the test protocol. 47% of the subjects who had completed the test protocol with the alcohol-based hand sanitizer reported palmar pain or discomfort, and tended to indicate some discomfort in palmar surfaces for one to several days after the test. In contrast, none of the subjects that used the alcohol-free benzalkonium chloride-based formula reported any pain or discomfort of their hands after completing the test protocol <sup>(2).</sup>

#### <u>In summary:</u>

- Benzalkonium chloride-based hand sanitizers had a greater sustained antibacterial activity than alcohol-basedhand sanitizers.
- Alcohol-based hand sanitizers became less effective with repeated use and irritated the hands of subjects.
- Benzalkonium chloride-based hand sanitizers became more effective without irritation after repeated use.

(1)Marples, RR, & Towers, AG (1979). A laboratory model for the investigation of contact transfer of microorganisms. The Journal of Hygiene, 82(2), 237-248.

(2)Dyer, DL, Gerenraich, KB, & Wadhams, PS (1998). Testing a new, alcohol-free sanitizer to combat infection. Association of Operating Room Nurses Journal, 68(2), 239-251.

### Virucidal Efficacy (Influenza A H1N1, Swine Flu, Mexican Flu)

The infectious agent for Swine flu (H1N1, Mexican flu) is an Influenza A virus (H1N1). The allowed FDA OTC claim for Sychem benzalkonium chloride-based and for Alcohol-based Hand Sanitizers is "reduces bacteria on the skin." However, it is known that benzalkonium chloride is effective at inactivating Influenza A virus, based on hard surface disinfectant data, at concentrations of 0.03-0.05% benzalkonium chloride. By comparison, Sychem contains 0.10% benzalkonium chloride: 2 to 3 times higher than what is required for disinfectant activity against Influenza virus. Typically, enveloped viruses such as Influenza A are easily inactivated by benzalkonium chloride. Note that for the same FDA claim of "reduces bacteria on the skin," alcohol-based products require 62% alcohol, where benzalkonium chloride requires only 0.1%. However, as mentioned above, FDA doesn't allow for virucidal claims under the Topical Antimicrobials monograph, for either benzalkonium or alcohol-based Hand Sanitizer products.

While we believe that virus claims can't be made on the product label, product literature can make reference to studies that indicate virucidal effectiveness, just as organizations such as CDC make recommendations based on literature references.

#### Is Sychem Effective?

Sychem Instant Foaming Hand Sanitizer is very efficient at reducing bacteria on the skin, effective against a broad range of pathogenic bacteria in as little as 15 seconds as the Chlorine Equivalency and Time Kill Data below illustrate:

#### Chlorine Equivalency Test

The object of this test is to determine the available chlorine germicidal equivalent concentration of the product as compared to 200, 100 and 50 ppm available chlorine in the NaOCl standard controls.

Initial Suspension Population Staphylococcus aureus ATCC Salmonella typhi ATCC 6539

6538 7.6 X 108 CFU/ml\* 1.2 X 108 CFU/ml

\*Colony Forming Units per ml of test mixture

Test	Test	est Concentration Subculture Series										
Organism	Substance		1	2	3	4	5	6	7	8	9	10
S. aureus	NaOCI Control	200 ppm	0	0	0	0	0	+	+	+	+	+
		100 ppm	0	0	+	+	+	+	+	+	+	+
		50 ppm	0	+	+	+	+	+	+	+	+	+
	Protect	RTU	0	0	0	0	0	0	0	0	0	0
S. typhi	NaOCI Control	200 ppm	0	0	0	0	0	0	+	+	+	+
		100 ppm	0	0	0	+	+	+	+	+	+	+
		50 ppm	0	0	÷	+	+	+	+	+	+	+
	Protect	RTU	0	0	0	0	0	0	0	0	0	0

+ = Growth of Organism

0 = No Growth of Organism

The subcultures of positive broths (tubes showing growth) demonstrated pure cultures of test organism.

Efficacy Result Sychem Foam Hand Sanitizer demonstrated an available chlorine equivalent to greater than the 200 ppm NaOCl standard control when tested against Staphylococcus aureus and Salmonella typhi.

#### **Efficacy Result**

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#### Is Sychem Safe for Use?

Sychem Foaming Hand Sanitizer is very effective at reducing bacteria on the skin, yet very gentle on the skin and eyes as the Toxicity Profile below indicates:

Toxicity Profile Sychem Instant Han	d Foam Sanitizer	Toxicity Profile Sychem 10X Concentrate			
Acute Oral LD <sub>50</sub>	>5.0 g/kg, Category IV	Acute Oral LD <sub>50</sub>	>5.0 g/kg, Category IV		
Acute Dermal LD <sub>50</sub>	>2.0 g/kg, Category III	Acute Dermal LD <sub>50</sub>	>2.0 g/kg, Category III		
Eye Irritation	Category III	Eye Irritation	Category I		
Skin Irritation	Category IV	Skin Irritation	Category IV		
Sensitization	Not a Skin Sensitizer	Sensitization	Not a Skin Sensitizer		

#### **Time Kill Study**

This study is designed to examine the rate of kill of a test substance after inoculation with a test organism. Results are expressed in percent reduction and log reduction of the test organism. Exposure time 15 Seconds

Organism	Test Population Control (CFU/ml)	Number of Survivors (CFU/ml)	% Reduction	Log Reduction	
Campylobacter jejuni ATCC 29428	1.02 X 10 <sup>7</sup>	<1 X 10 <sup>2</sup>	>99.999	>5.00 Log <sub>10</sub>	
Candida albicans ATCC 10231	1.60 X 10⁵	6.0 X 10 <sup>3</sup>	96.3	1.42 Log <sub>10</sub>	
Clostridium difficile ATCC 9689	3.40 X 10 <sup>6</sup>	<2	>99.9999	>6.20 Log <sub>10</sub>	

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Enterococcus faecalis Vancomycin Resistant (VRE) ATCC 51575	1.12 X 10 <sup>6</sup>	3.2 X 10 <sup>1</sup>	99.99	4.54 Log <sub>10</sub>	
Escherichia coli ATCC 11229			99.999	6.00 Log <sub>10</sub>	
Escherichia coli O157:H7 ATCC 35150	1 26 8 100		>99.999	>5.80 Log <sub>10</sub>	
Xlebsiella pneumoniae 1.10 X 10 <sup>6</sup>		2	99.999	5.70 Log <sub>10</sub>	
Listeria monocytogenes ATCC 19117	4.7 X 10 <sup>6</sup>	1.9 X 103	99.9	3.39 Log <sub>10</sub>	
Pseudomonas aeruginosa ATCC 15442	3.5 X 10 <sup>6</sup>	<2	99.9999	>6.20 Log <sub>10</sub>	
Salmonella choleraesuis serotype enteritidis ATCC 4931	6.8 X 10 <sup>5</sup>	2	>99.999	5.50 Log <sub>10</sub>	
Salmonella choleraesuis serotype paratyphi ATCC 8759	5.6 X 10 <sup>5</sup>	<2	>99.999	>5.50 Log <sub>10</sub>	
Salmonella choleraesuis serotype pullorum ATCC 19945	8.9 X 10 <sup>5</sup>	<2	>99.999	>5.70 Log <sub>10</sub>	
Salmonella choleraesuis serotype typhimurium ATCC 23564	7.7 X 10 <sup>5</sup>	6	>99.999	>5.10 Log <sub>10</sub>	
Salmonella typhi ATCC 6539	1.27 X 10 <sup>6</sup>	2	99.999	5.80 Log <sub>10</sub>	
Shigella dysenteriae ATCC 13313	1.3 X 10 <sup>6</sup>	<2	>99.999	>5.80 Log <sub>10</sub>	
Shigella flexneri ATCC 12022	1.39 X 10 <sup>6</sup>	2.8 X 10 <sup>1</sup>	99.99	4.69 Log <sub>10</sub>	
Shigella sonnei ATCC 25931	2.43 X 10 <sup>7</sup>	2.0 X 101	99.9999	6.09 Log <sub>10</sub>	
Staphylococcus aureus ATCC 6538	6.7 X 10 <sup>6</sup>	<2	>99.9999	>6.53 Log <sub>10</sub>	
Staphylococcus aureus Methicillin Resistant (MRSA) ATCC 33592	1.23 X 10 <sup>7</sup>	3.8 X 10 <sup>3</sup>	>99.9	3.51 Log <sub>10</sub>	
Staphylococcus aureus Community Associated Methicillin Resistant (MRSA) NARSA NRS 123, Genotype USA400	1.18 X 10 <sup>6</sup>	5.8 X 102	>99.9	>3.30 Log <sub>10</sub>	
Staphylococcus epidermidis ATCC 12228	7.2 X 10 <sup>5</sup>	<2	99.999	5.56 Log <sub>10</sub>	
Streptococcus pneumonia ATCC 6305	6.4 X 10⁵	<2	>99.999	>5.51 Log <sub>10</sub>	
Streptococcus pyogenes ATCC 19615	1.77 X 10 <sup>6</sup>	<2	>99.999	>5.90 Log <sub>10</sub>	
Vibrio cholera ATCC 11623	4.7 X 10⁵	<2	>99.999	>5.40 Log <sub>10</sub>	
Xanthomonas axonopodis (Citrus Canker) ATCC 49118	odis (Citrus 1.28 X 10 <sup>6</sup> 3.		>99.99	4.55 Log <sub>10</sub>	
Yersinia enterocolitica ATCC 23715	2.23 X 10 <sup>6</sup>	3.8 X 10 <sup>1</sup>	99.99	4.77 Log <sub>10</sub>	