

## ***Hand Sanitizers – What You Need to Know***

On March 13<sup>th</sup>, President Trump declared a National Emergency with respects to the Coronavirus. By such declaration, the Food & Drug Administration (FDA), who approves all topical hand sanitizers, is allowing (via Non-Enforcement) for additional manufacturing of Hand Sanitizers by various manufacturers throughout the US. During this time of National Emergency these new Hand Sanitizer manufacturers are commonly referred to as “Distillers”, despite what they made prior to The Pandemic.

Many ISG dealers are most likely dealing with one of the hundreds of the Distillers making Hand Sanitizer. Be aware, that once the National Emergency ends (which has no specific end date), many of these new Hand Sanitizer suppliers will have to stop manufacturing their versions of the product. Generally, it is believed that this time frame will be on or about June 30<sup>th</sup>, 2020. ISG has identified & vetted a Direct Supplier options for Alcohol Based Gel Hand Sanitizer companies:

### **Direct Supplier**

Mill Mats – 65% Alcohol – Gel Hand Sanitizer – check them out in the Back To Work Playbook

- (5.1.20) 16 oz. with a Pump will cost you under \$5.50 shipped – minimums apply – Terms & Conditions

Should you buy from a Hand Sanitizer supplier on your own, I recommend that you ask the following questions of your Hand Sanitizer supplier:

- 1) Who is the Pharmacist involved with their operation?
- 2) Do they plan on producing Hand Sanitizer beyond the National Emergency (Post-Pandemic)?
- 3) Does your product’s Safety Data Sheet state how to properly store & transport your product?
- 4) Has your company (the distiller) registered their manufacturing process with the FDA, and will they provide that information to you as a distributor?

Now these questions are bound to get a bunch of proverbial blank stares. Here are some resources you can use to help you stay in compliance as a Hand Sanitizer Distributor.

### **Additional Manufacturing:**

The FDA has provided guidance to Distillers allowing them to produce alcohol hand sanitizers during the National Emergency until around June 30<sup>th</sup>, 2020. Again, the FDA’s stance will take a position of Non-Enforcement their traditional rules and regulations due to the COVID-19 Pandemic.

Reference this site from the Alcohol & Tobacco Tax & Trade Bureau (TTB) to learn more about the guidance given to actual Manufacturing of the product:

<https://www.ttb.gov/public-guidance/ttb-pg-2020-1a>

### **Delivery & Transport:**

*Pipeline and Hazardous Materials Safety Administration* (PHMSA) a department found within the U.S. Department of Transportation (DOT) has ruled that they will not enforce DOT regulations based on FDA guidance for Pandemic Hand Sanitizers. There is reference that they’ll follow the same time line guidelines within the following document, but there is no reference to specific dates.

Based on FDA guidance, there is an assumption that June 30<sup>th</sup> would be the end date of non-enforcement of traditional DOT regulations with regards to Alcohol Hand Sanitizer. Go to PHMSA website to read the latest about relief notices

<https://www.phmsa.dot.gov/news/revised-temporary-relief-notice-companies-transporting-hand-sanitizer-highway>

## Warehousing Ready to Use Hand Sanitizer:

Unfortunately, there is no “one size fits all” answers with proper warehousing of Hand Sanitizer. Factors like volume, packaging, flash points, & the recipe a distributor is selling all go into how Hand Sanitizers should be stored.

With the many different variations of Hand Sanitizers that are on the market, its best to read the SDS to determine how the Hand Sanitizer you are distributing is to be stored. Most Hand Sanitizers are considered Class 2 or 3 flammable liquids (even if they are a gel based product).

I recommend that you look at this website from SAFTENG which bases its content on Occupational Safety & Health Association (OSHA) & International Fire Code (IFC) information.

<https://www.safteng.net/index.php/free-section/safety-info-posts/flammable-liquids/6278-when-a-business-converts-to-handling-flammable-liquids-for-the-pandemic-response-part-2-indoor-storage>

If you have questions, feel free to email me to discuss.

Frank Hoard  
Director, Facility Supply Channel



Independent Suppliers Group  
330-212-5985 / [Hoard@isg.coop](mailto:Hoard@isg.coop)