



November 9, 1992

Mr. Bill B. Dixon
Star-Lee Products Co.
A Division of Mil-Tex Corp.
2670 South 200 East
Salt Lake City, Utah 84109

Mr. Dixon was the original
owner/developer of Chimal
& Star Lee Skin Shield

Dear Mr. Dixon:

This is in response to your letter to Charles Edwards received on October 5, 1992, regarding the use of a skin care product by food handlers as a secondary hand protector under their gloves.

During our meeting we informed you that although hand creams are not generally allowed for use by employees who handle edible food products, we have no objection to the use of a skin care product, as prescribed by a health professional at a USDA inspected meat or poultry establishment, provided:

1. the plant supplies and monitors the appropriate use, (this includes maintaining a current list of the names and work locations of the treated employees);
2. the employee's hands are covered by an intact rubber or plastic glove that conforms to the requirements of the Federal Food, Drug, and Cosmetic Act for direct food contact, and is maintained in a sanitary condition;
3. the Inspector in Charge (IIC) is notified prior to use of this skin care product and is furnished a copy of the list required in provision #1, above.

Intact gloves are expected to provide an impervious barrier between the employee's hands and the food product to prevent the possibility of food adulteration caused by any transfer of the hand care product to the food. IIC notification is necessary so that a USDA representative can monitor the use of the hand cream and gloves.

The appropriate use of the product must be acceptable and satisfactory to the Inspector in Charge at the establishment. The IIC may discontinue use of the hand cream if any of the provisions stated above are not met or if use, in the opinion of the IIC, is resulting in the adulteration of food product.

If we can be of further assistance, please feel free to contact us.

Sincerely,

John M. Damaré, Chief
Compounds and Packaging Branch
Product Assessment Division

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