

As members of the Pigmentary Disorders Academy, we would like to express our comments on the Food and Drug Administration's (FDA) review of skin-bleaching drug products for over-the-counter (OTC) human use (Docket No. 1978N-0065 /RIN No. 0910-AF53).¹ As part of the FDA's ongoing review of OTC drug products, the FDA intends to consider all skin-bleaching drug products, whether currently marketed on a prescription or OTC basis, to be new drugs requiring an approved new drug application (NDA) for continued marketing. The enforcement of this rule will remove from the market unapproved prescription and non prescription skin bleaching drug products containing hydroquinone that have not undergone formal FDA review. To our knowledge, many ingredient combinations containing hydroquinone have not been adequately tested for safety and efficacy.

In 1982 the FDA proposed that hydroquinone (1.5–2.0 %) should be generally recognized as safe and effective (GRASE), however we understand that a need for safety data has now been identified. Concerns raised include the potential for carcinogenicity, leukoderma and ochronosis.

We agree that in the absence of direct medical supervision by way of prescription, the availability of hydroquinone in OTC preparations is not desirable at least until the safety of hydroquinone has been thoroughly documented. We are aware that in a similar action, authorities in the European Union have restricted the availability of hydroquinone to prescription only status.

In order to practice evidence-based medicine, we fully support the principle that data regarding the efficacy and safety of skin-bleaching products should be available to clinicians to aid decision making and good clinical practice. This also applies to data documenting the pharmaceutical quality and stability of OTC preparations (and prescription preparations) combining hydroquinone with other active and inactive ingredients. In the absence of FDA review, users of these products could be exposed to unknown health and safety risks posed by these ingredient combinations. As skin-bleaching products are intended for use in otherwise healthy individuals, the risk-benefit ratio is of particular importance.

Pigment disorders, while not life-threatening, can have a significant psychosocial impact. Hydroquinone is an effective treatment that provides significant improvements in both appearance and quality of life. Trials of topical hydroquinone treatments have provided data on the efficacy of this treatment, extending over 40 years of use.²

As members of the Pigmentary Disorders Academy we therefore still value hydroquinone as part of the therapeutic armamentarium and feels it has an important role to play in the treatment of specific pigment disorders. We however acknowledge that the New Drug Application (NDA) (or the Marketing Authorization Application –MAA- in Europe) is the regulatory process by which the FDA establishes whether or not products are both safe and effective³. We hope and actively encourage that all manufacturers of hydroquinone for use as a medication provide the data by way of an NDA regarding the

safety and efficacy of their products to the FDA so that we can continue to prescribe safe hydroquinone-containing products and patients can continue to receive the benefits of their use under medical supervision.

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References

1. Department of Health and Human Sciences. Food and Drug Administration. 21 CFR Part 310. RIN 0910-AF53. Skin bleaching drug products for over-the-counter human use; proposed rule. Federal Register 2006;71(167):51146–55.
2. Arndt KA and Fitzpatrick TB. Topical use of hydroquinone as a depigmenting agent. JAMA 1965;194:965–7.
3. U.S. Food and Drug Administration • Center for Drug Evaluation and Research

The Pigmentary Disorders Academy's mission is to increase awareness of pigmentary disorders among the dermatology community and the broader medical profession.

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