

Un nuovo strumento di competitività per l'area *regulatory affairs* di ogni azienda cosmetica

Powered by



Matteo Zanotti Russo Cosmoprof Bologna, 29 Aprile 2022



## Highlights

- PIF, CPSR, Safety Assessment: obblighi o strumenti?
- In pratica
- Criticità ed evoluzioni
- La soluzione proposta: ToxTool™
- Credits





## Annex I: il Cosmetic Product Safety Report - CPSR

• Cos'è? Che funzione ha?





#### CPSR: cosa e come

- Obbligo (Reg. 1223/2009, art.. 10-11, all.l)
- All.I: struttura minima.
- Conclusioni (CPSR-B): «Disco verde» alla immissione in commercio
- Come? Linea Guida 'SCCS Notes of Guidance'
- → Decision Making (si- no si «se»)
- Responsible Person: esamina, segue le eventuali indicazioni (condizioni), approva (e immette in commercio)





## Perché 'documentato'?

Criterio di base: NO pre market approval, Post Market Survey

....

Autocertificazione

Validazione dei processi e Controllo Documentato Controllo de rischio (Riduzione)

Sorveglianza (autorità)





## Valutazione della Sicurezza

- Atto Scientifico
- Multifattoriale
- Ponderato













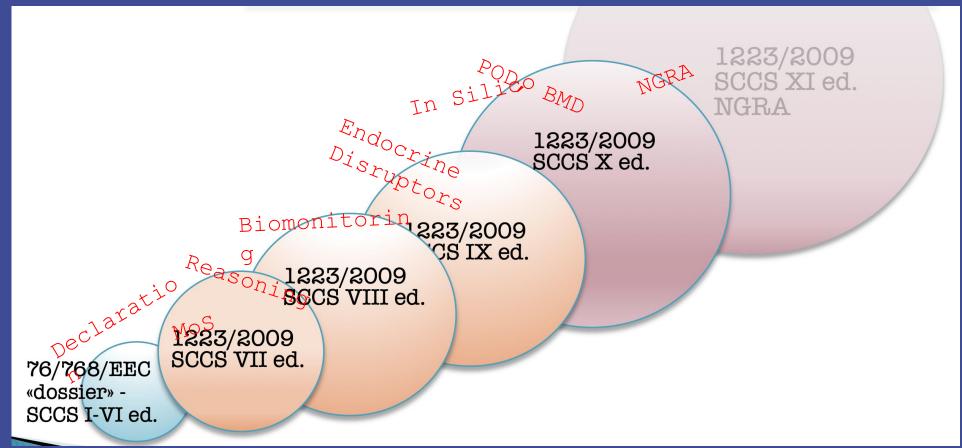
# I DATI nella vita del Safety Assessor: reperimento, trattamento, gestione

- Crescita esponenziale (time consuming)
- Realizzazione, implementazione, aggiornamento
- Si impone la realizzazione di un Database
- Interpretazione (margini di incertezza)
- Conclusioni (decision making)
- Reasoning scientifico
- Responsabilità





## Evoluzione: SCCS NoG







## Il CPSR nella vita reale: la nostra esperienza

- Auditing: +150 filiere
- Teaching: Università, Corsi Cosmetica Italia Servizi
- EU Working Groups
- Confronto con:
  - Aziende
  - Esperti-Safety Assessors
  - Associazioni Internazionali
  - Autorità Competenti





## Criticità di oggi

- Dati incompleti
- Dati non aggiornati
- Reasoning poco strutturati





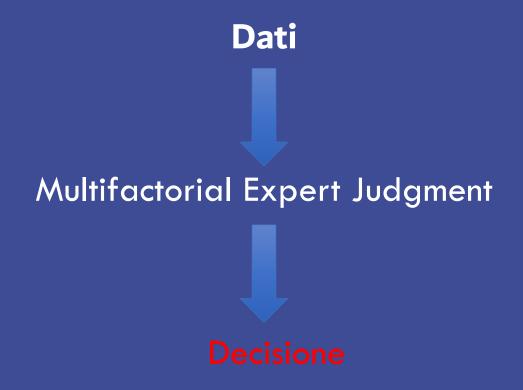
#### Criticità di domani

- SCCS NoG XI Ed.: NGRA
- Dati → non più sufficienti a un 'Expert Judgment'
- → Hypotesis Driven, Iterative, Tiered





## Il processo decisionale







## NGRA: Il nuovo processo decisionale







#### La soluzione?

- Un Database?
- Un elenco?
- Un software?



rappresentativo

dinamico

strutturato

aggiornato

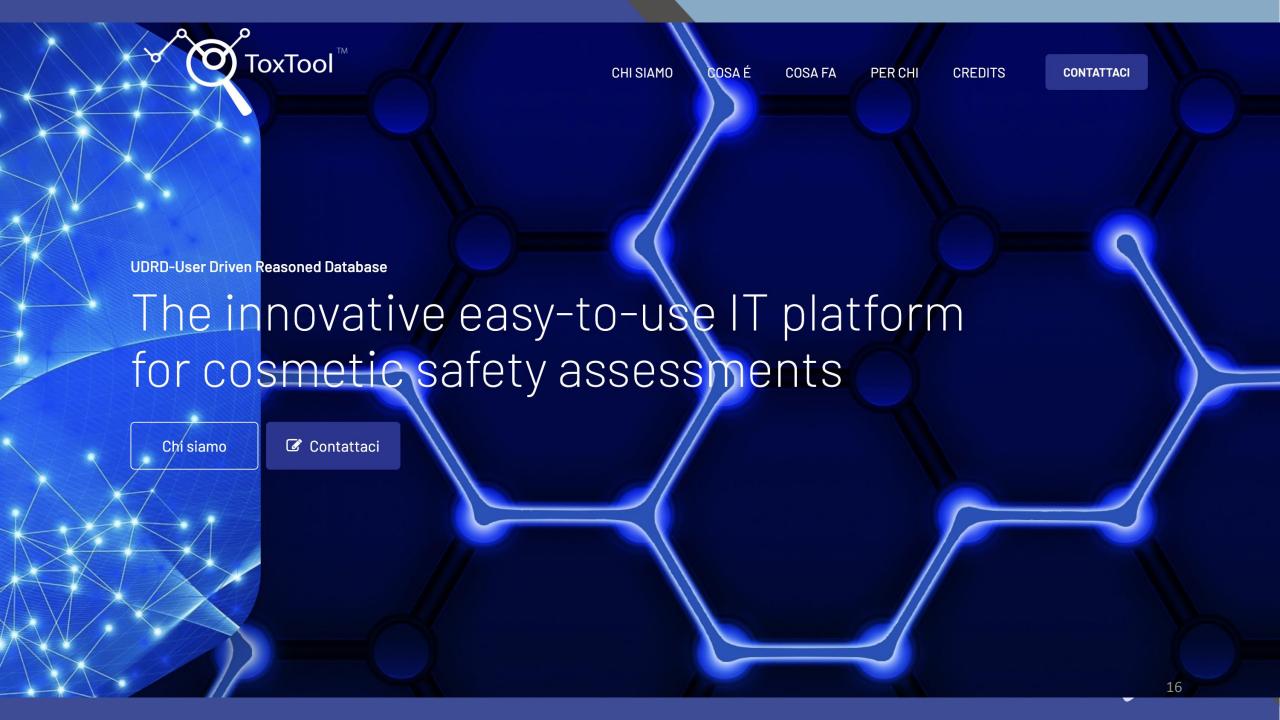
user driven

user friendly

condiviso







# Cosa è?

Un database tossicologico. E molto di più. Completo, condiviso, ragionato.





## Strutturato, User Driven, Condiviso

#### Condiviso

I dati sono condivisi fra i Safety Assessor e i contributor che vorranno aiutarci a implementare in maniera sempre più efficace il database. I documenti creati per aiutarti nella realizzazione di PIF e CPSR riporteranno un QR code di sicurezza ToxToolTM, così da incrementare la loro rappresentatività







#### Login to your account

Password

Remember me

Forgot password?

Login



## info@angelconsulting.eu



♣ Toxicological DB

3916

Products



My requests



I	Tox	DB	Q	Search
	To Design the Line			



3	3916 records, showing 0-14 Basic info Substance reason		oning	Regulatory status and scientific literature		Substance Information	Toxicological Data			
		Id	INCI ↑				CAS	EINECS		Cosmetic function
	100	2114	1-HEXYL 4,	,5-DIAMINO PYRA	AZOLE SULFATE	0	1361000-03-4	696-231-5		hair dyeing
		2115	1-HYDROX	YETHYL 4,5-DIAN	IINO PYRAZO	0	155601-30-2	429-300-3		hair dyeing
		2116	1-METHYLI	HYDANTOIN-2-IM	IIDE	0	60-27-5	200-466-7		Skin conditioning
		2117	1-NAPHTHOL i			0	90-15-3	201-969-4		hair dyeing
		5883	1-NAPHTHOL;			0	90-15-3	201-969-4		Technically unavoidable imp
	*	2118	1,10-DECA	NEDIOL		0	112-47-0	203-975-2		solvent
		1982	1,2-HEXAN	NEDIOL		0	6920-22-5	230-029-6		solvent
		2122	1,3-BIS-(2,4	4-DIAMINOPHEN	OXY)PROPANE	0	81892-72-0 / 74918-21-1	279-845-4 / 278-0	)22-7	Hair Dyeing
	0	2123	1,3-BUTAN	IEDIOL		0	107-88-0	203-529-7		Fragrance Humectant Skin
		2124	1,4-BUTAN	IEDIOL		0	110-63-4	203-786-5		solvent
	774									



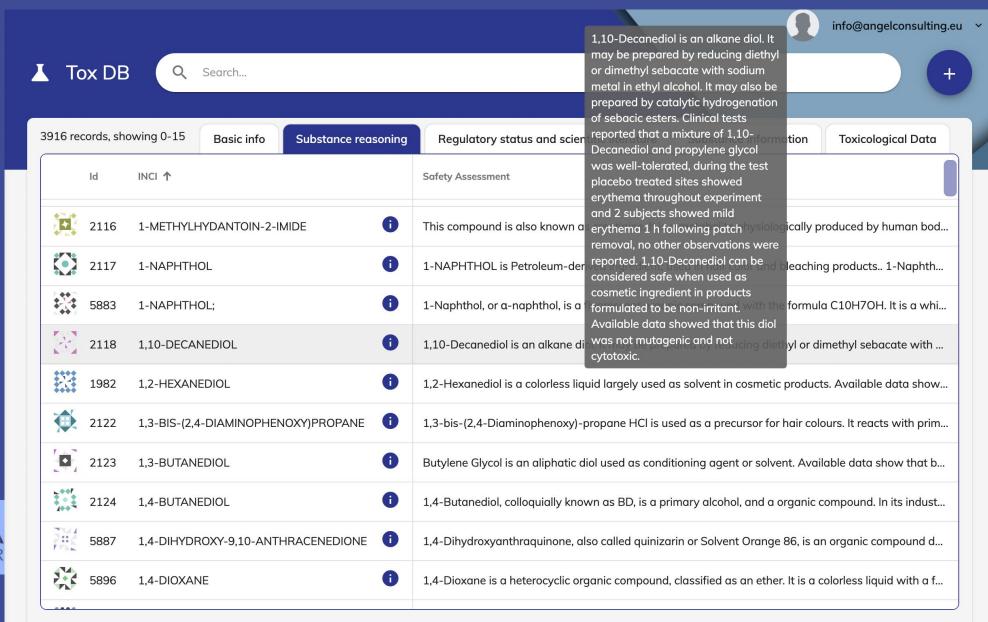


#### **Basic Info**





## Substance Reasoning





#### **▲** Tox DB

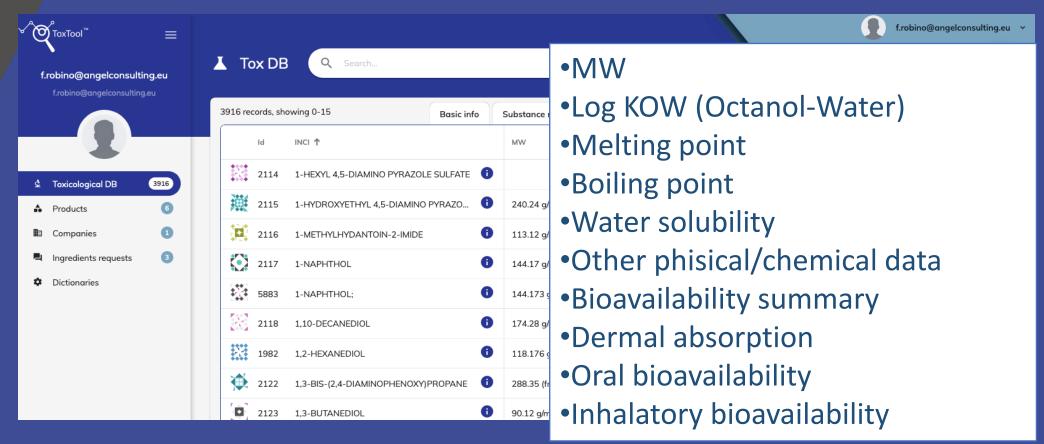
Q Search...



3916 records, sho	wing 0-15 Basic info Substance reasoning		Annex III/16 Product Type, body parts: Hair dye substance in oxidative hair dye products	ture Substance Information Toxicolog	ical Data
Id	INCI ↑	EU	concentration in ready for use preparation:/ Other: After mixing under oxidative conditions the	Harmonised CLP classification	Scientific Lite
2116	1-METHYLHYDANTOIN-2-IMIDE		maximum concentration applied to hair must not exceed 2,0% Wording of conditions of use and warnings:	There is no harmonised classification.	-ECHA web
2117	1-NAPHTHOL i	A	To be printed on the label: Hair colorants can cause severe allergic	Hazard Class and Category Codes: Acute T	-SCCNFP/0
5883	1-NAPHTHOL;	Aı	reactions. To be printed on the label: The mixing ratio "Hair colorants can 4 cause severe allergic reactions. Read	ECHA: Harmonised Classification Acute To	ECHA A mo
2118	1,10-DECANEDIOL i		and follow instructions. Hair colourants can cause severe allergic	There is no harmonised classification	ECHA web
1982	1,2-HEXANEDIOL i		reactions. Read and follow instructions. This product is not intended for use on persons under	There is no harmonised classification	- ECHA we
2122	1,3-BIS-(2,4-DIAMINOPHENOXY)PROPANE i	A	the age of 16. Temporary 'black henna' tattoos may increase your		Scientific C
2123	1,3-BUTANEDIOL i		risk of allergy. Do not colour your hair if: — you have a rash on your	There is no harmonised classification.	- ECHA We
2124	1,4-BUTANEDIOL i		face or sensitive, irritated and damaged scalp, — you have ever experienced any reaction after		- ECHA we
5887	1,4-DIHYDROXY-9,10-ANTHRACENEDIONE i		colouring your hair, — you have experienced a reaction to a	Don't have the Harmonised Classification	ECHA web
5896	1,4-DIOXANE	Aı	temporary 'black henna' tattoo in the past Regulation: (EC) 2013/344 Regulation: (EC) 2009/1223	ECHA Harmonised Classification Flam. Liq	ECHA web

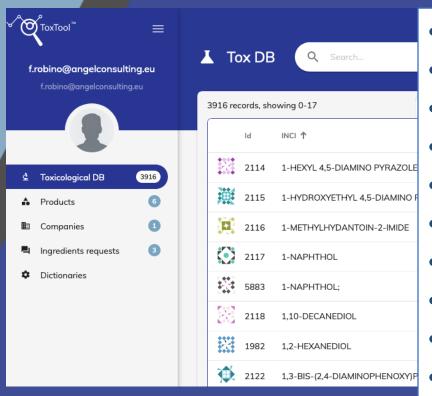


#### **Substance Information**





## Toxicological Data



- Skin irritation
- Eye irritation
- Skin sensitization
- Photo-induced toxicity
- Dermal sensitization
- Repeated toxicity data
- Acute toxicity data
- Toxicity to reproduction data
- Genetic toxicity / Carcinogenicity data
- Endocrine activity
- Organospecific toxicity
- TTC
- Selected POD





## In Silico



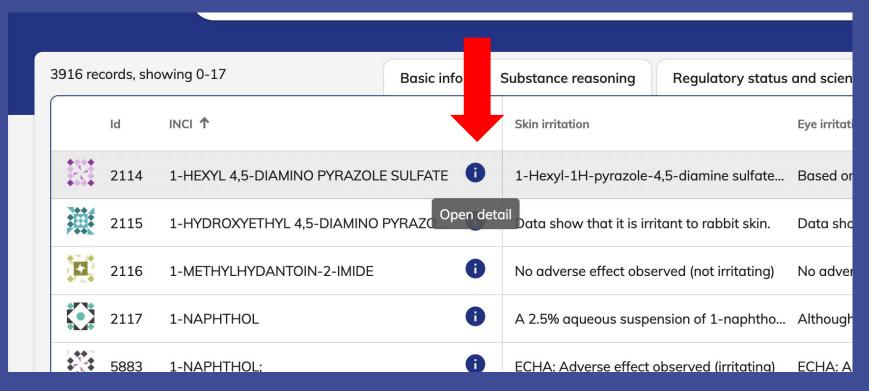


- Vermeer Cosmolife : Include Vega, ToxRread, Merlin Expo Erica
- Con nuovi algoritmi specifici per gli ingredienti cosmetici per:
  - NOAEL,
  - Risk Caracterisation,
  - TTC



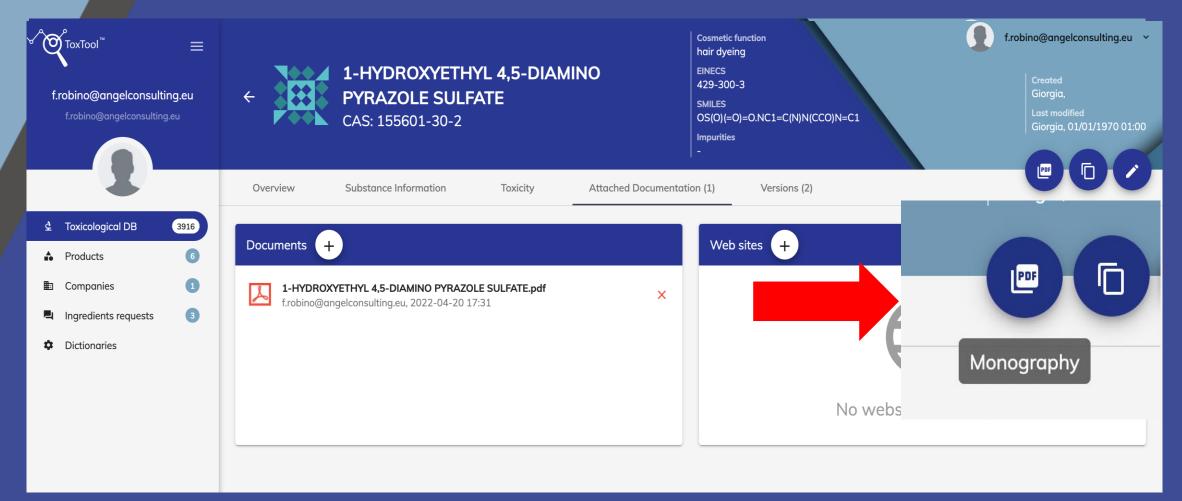


#### Overview





## Dettagli





## COSA FA?

## Le sue caratteristiche

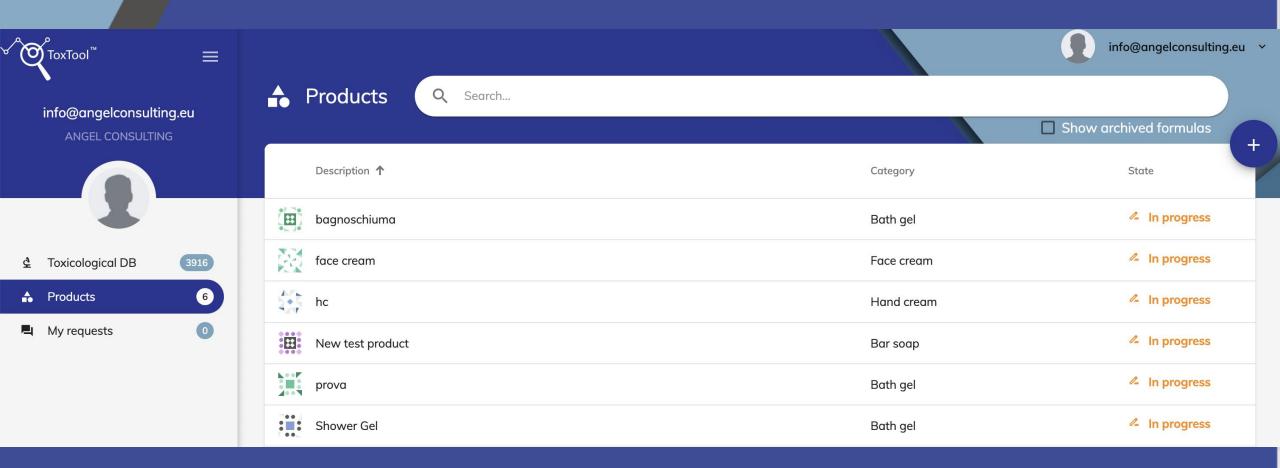


## Esportazione dei dati

Per una facile introduzione nel Cosmetic Product Safety Report, offre in pochi click una reportistica impeccabile in pdf e compatibile con gli attuali software per la realizzazione PIF



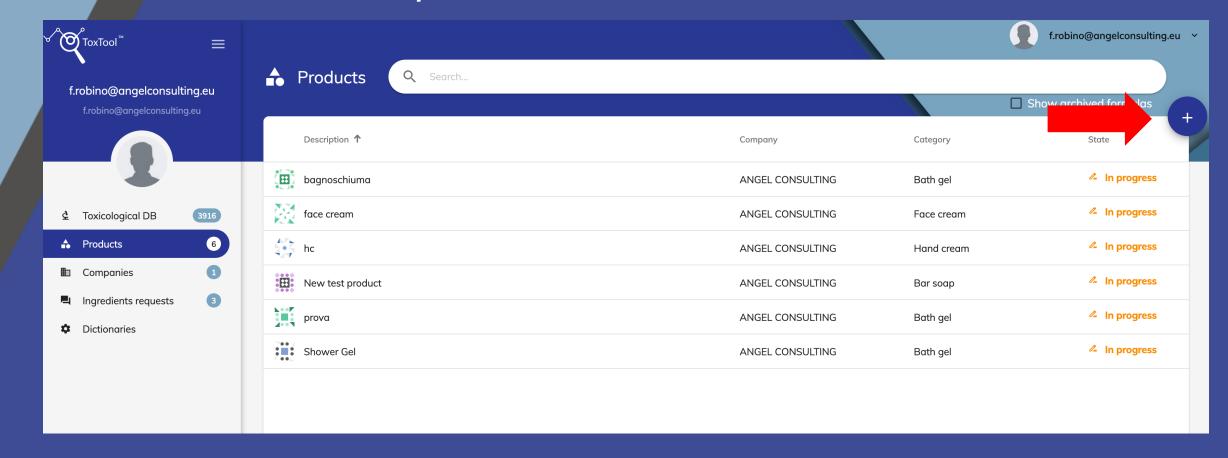






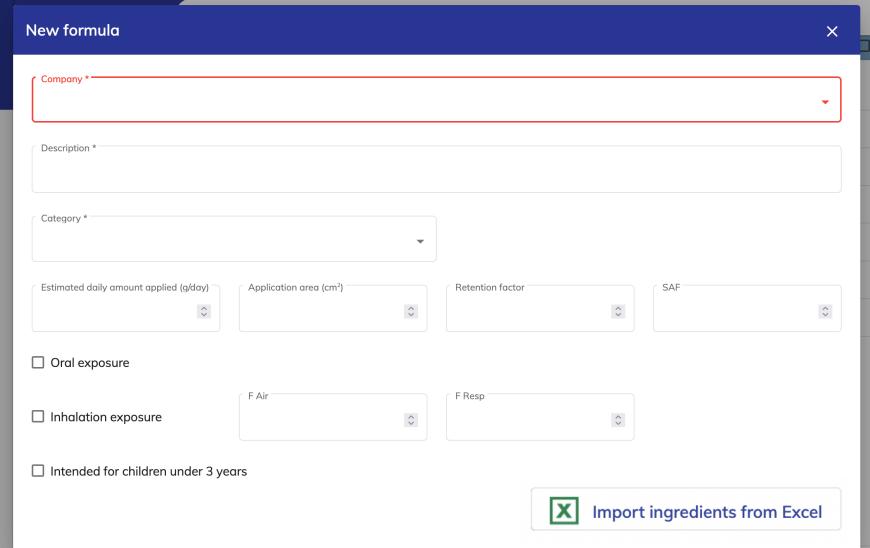


## Prodotti <del>Upload</del>





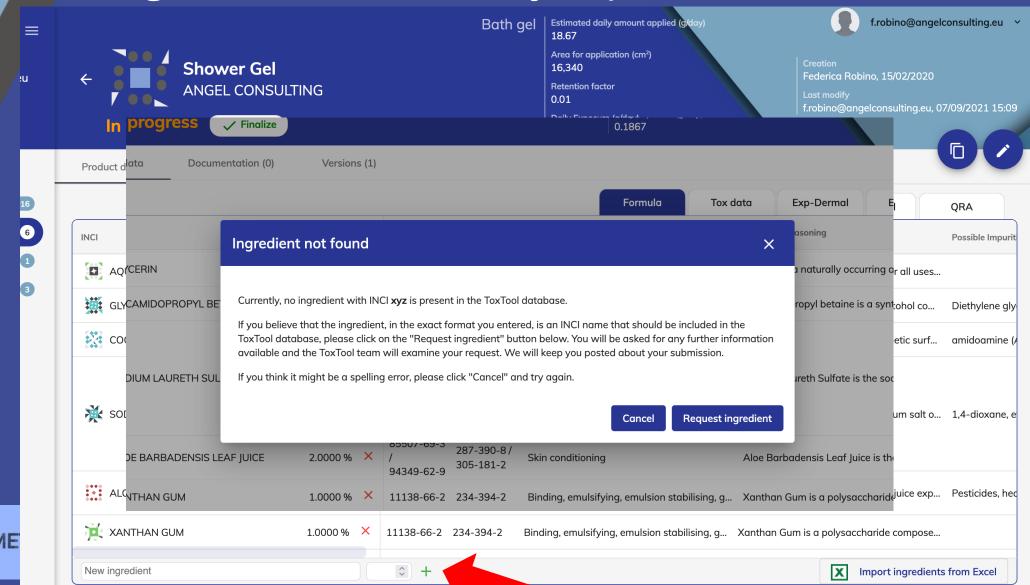
## Inserimento







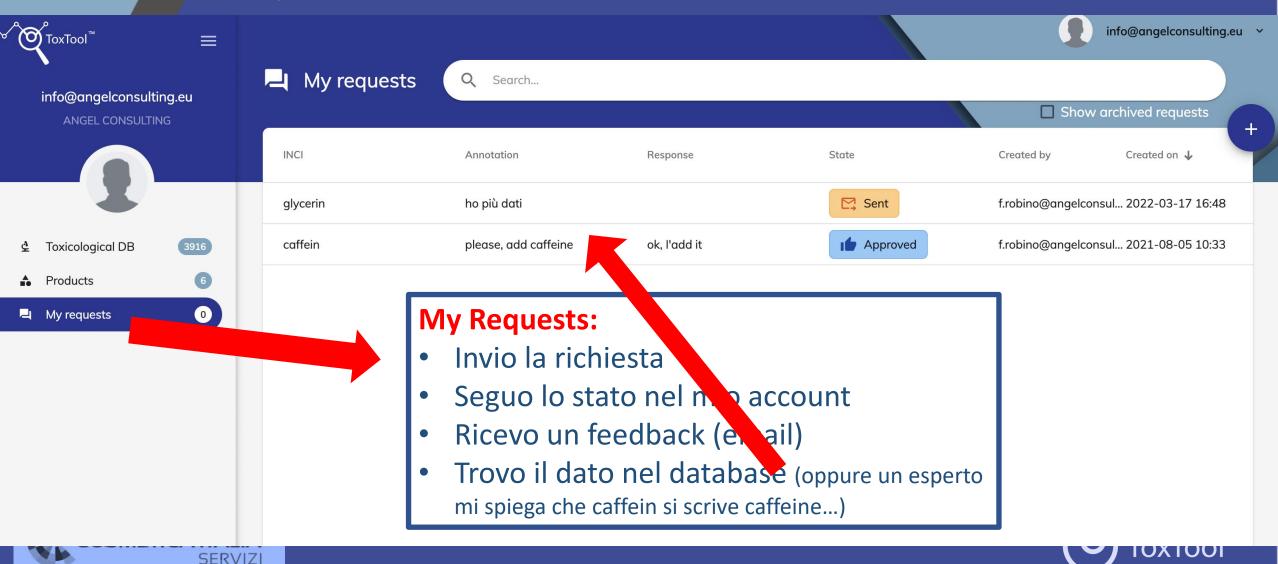
## Ingredienti mancanti? My requests...



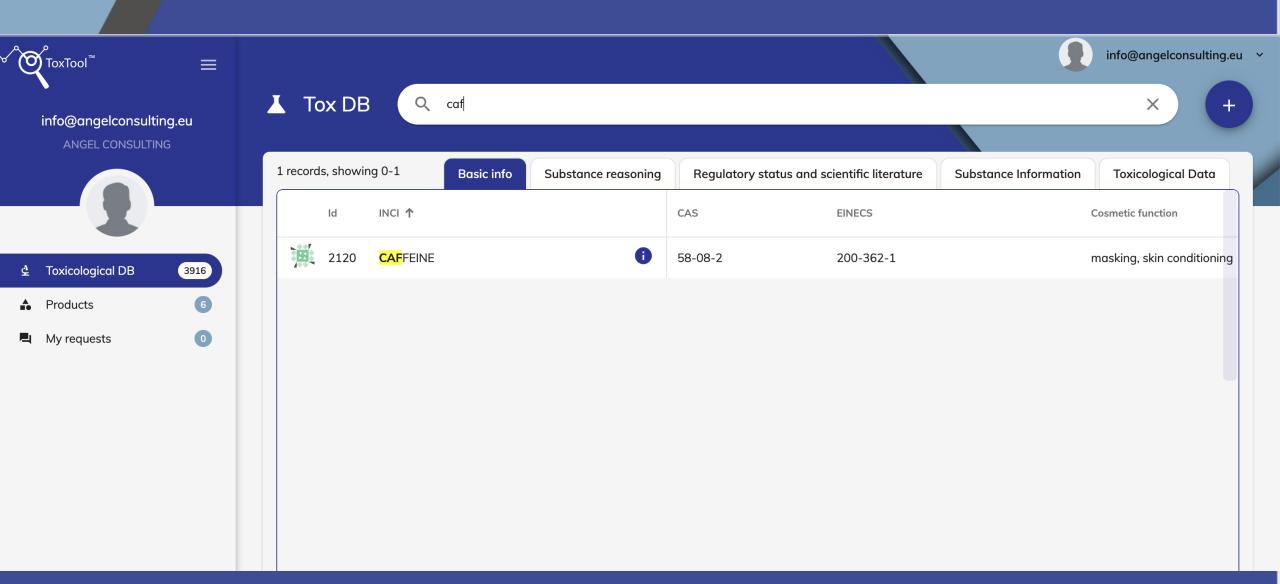


(Tool

## My Requests



## Caffein? Quindi devo stare attento a scrivere gli INCI giusti?



## Tabelle tossicologiche dei prodotti finiti

**+** 

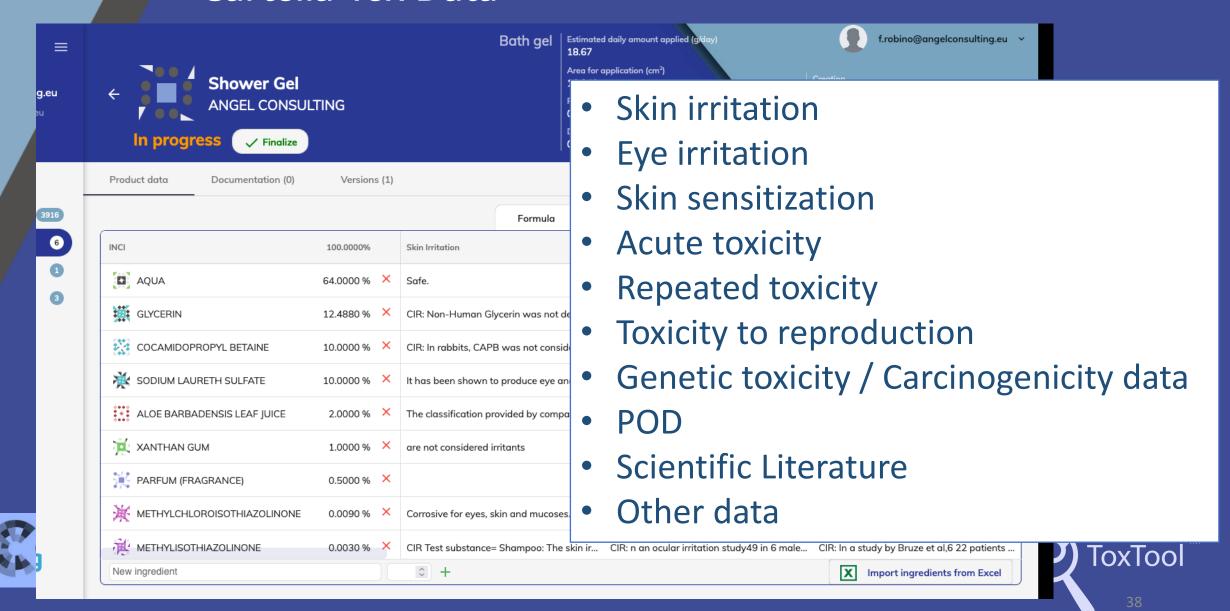




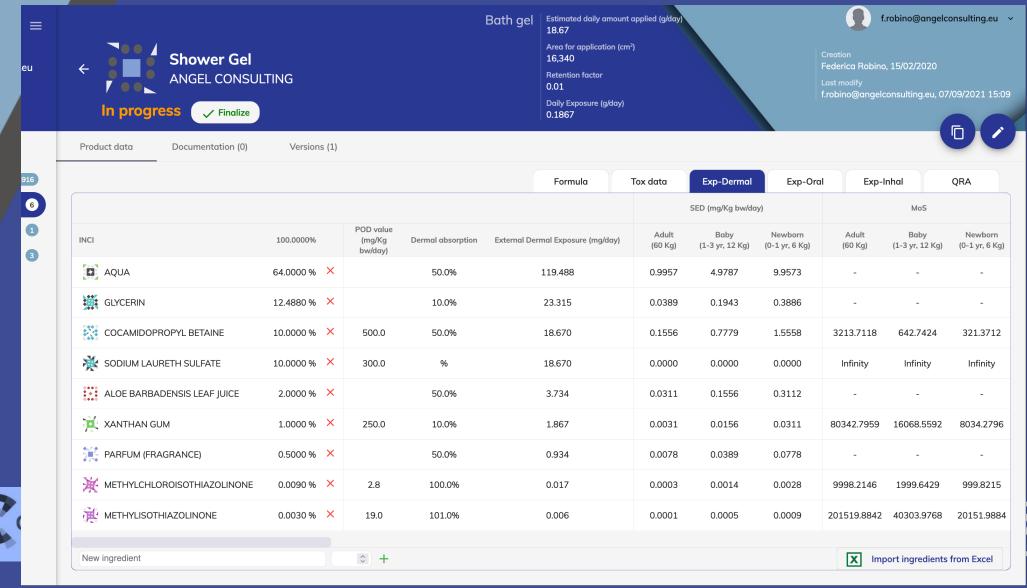
New ingredient

Import ingredients from Excel

### Cartella Tox Data

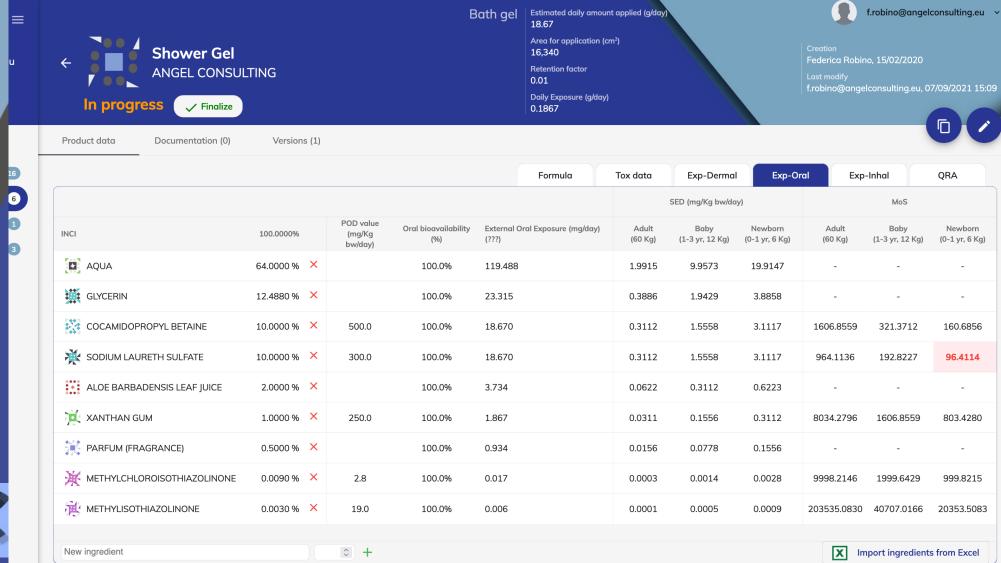


# Tabella Exp-Dermal → MoS





## Tabella Exp-Oral → MoS







## Tabella Exp-Inhal

**+** 



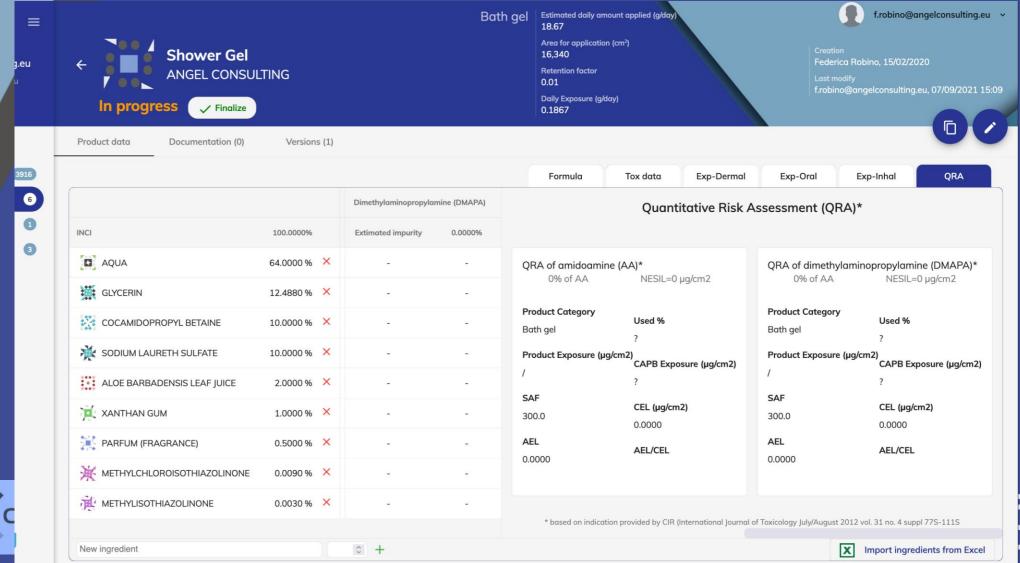
					Formula	Tox data	Exp-Dermal	Exp-Oral	Ex	p-Inhal	QRA
INCI	100.0000%	POD value (mg/Kg bw/day)	Potential product amount inhaled (g/application)	potential product amount inhaled during box 1 (mg/application)	potential product amount inhaled during box 2 (mg/application)	Adult (60 Kg)	Baby (1-3 yr, 12 Kg)	Newborn (0-1 yr, 6 Kg)	Adult (60 Kg)	Baby (1-3 yr, 12 Kg)	Newborn (0-1 yr, 6 Kg
AQUA	64.0000 %	<	0	0	0%	NaN	NaN	NaN	-	-	-
GLYCERIN	12.4880 %	<	0	0	0%	NaN	NaN	NaN	-	-	-
COCAMIDOPROPYL BETAINE	10.0000 %	500.0	0	0	0%	NaN	NaN	NaN	NaN	NaN	NaN
SODIUM LAURETH SULFATE	10.0000 %	300.0	0	0	0%	NaN	NaN	NaN	NaN	NaN	NaN
ALOE BARBADENSIS LEAF JUICE	2.0000 %	<	0	0	0%	NaN	NaN	NaN	-	-	-
XANTHAN GUM	1.0000 %	250.0	0	0	0%	NaN	NaN	NaN	NaN	NaN	NaN
PARFUM (FRAGRANCE)	0.5000 %	<	0	0	0%	NaN	NaN	NaN	-	-	-
METHYLCHLOROISOTHIAZOLINONE	0.0090 %	2.8	0	0	0%	NaN	NaN	NaN	NaN	NaN	NaN
METHYLISOTHIAZOLINONE	0.0030 %	19.0	0	0	0%	NaN	NaN	NaN	NaN	NaN	NaN



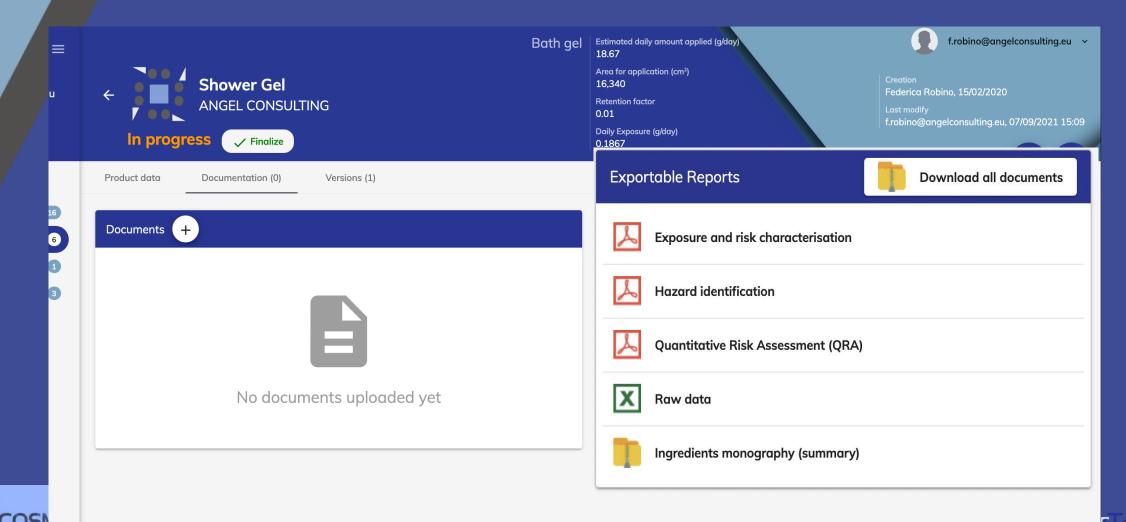
New ingredient

[oxTool ™

## **QRA**



## Reportistica - Esportazione





### **Hazard identification**

### **Shower Gel**

Version 2

2022-04-29 06:35







#### Hazard identification

#### COCAMIDOPROPYL BETAINE

#### Ingredent data

**INCI: COCAMIDOPROPYL BETAINE** 

CAS: 61789-40-0

EINECS: 263-058-8 / 931-296-8

Impurities: amidoamine (AA) dimethylaminopropylamine (DMAPA)

#### Local toxicity

Skin irritation	Eye irritation	Skin sensitization	Photo-induced toxicity
CIR: In rabbits, CAPB was not considered to be a dermal irritant at concentrations up to 50% in most studies. One study of a full-strength CAPB solution (30% active) found the ingredient to be a mild primary irritant with a PII of 0.5.	The classification provided by companies to ECHA in CLP notifications identifies that this substance causes serious eye damage.  CIR: CAPB (2.3% active and greater) was mild to moderately irritating to rabbit eyes in the majority of the ocular studies.	A majority of data submitters agree this substance is Skin sensitising. In fact, results of human studies have shown that CAPB has a low sensitizing potential if impurities with amidoamine (AA) and dimethylaminopropylamine (DMAPA) are low and tightly controlled.  CIR:  No delayed contact hypersensitivity was observed in guinea pig studies of 0.5% and 0.75% CAPB; however, a guinea pig maximization/Draize study of CAPB at 0.1% and 0.15% was positive for sensitization. A LLNA study was positive for sensitization to CAPB.	CIR: n investigation of the potential of a 3.0% active aqueous solution of CAPB to induce contact photoallergy was tested using 30 human subjects. The 11 subjects who had mild to moderate erythemic responses at the irradiated sites during the induction testing were those that received both UVA and 2 MED of UVB irradiation. These responses were expected from the UVB exposure. CAPB was not a photosensitizer in this study.

#### Systemic toxicity

Repeated Dose Toxicity Data	Acute Toxicity Data	Toxicity to Reproduction Data	Genetic Toxicity / Carcinogenicity Data	Endocrine activity	Organospecific Toxicity	ттс
ECHA  Oral route - systemic effects: No adverse effect observed NOAEL 500	ECHA  Acute toxicity  Oral route:  No adverse effect observed	ECHA  Effect on fertility Oral route: No adverse effect observed NOAEL 1 000	Genotoxicity - InVitro No adverse effect observed (negative) Genotoxicity - InVivo No study available		·	Classification according Cramer class: High (Class III). TTC according Cramer classification: 0.0015 mg/kg bw/day.





mg/kg bw/day LD50 5 000 mg/kg mg/kg bw/day (subchronic, CIR: (subacute, rat) bw Dermal route: Carcinogenicity: An aqueous preparation of a non-oxidative No adverse Effect on developmental hair dye formulation containing an unspecified effect observed toxicity LD50 2 000 mg/kg Oral route: grade of CAPB at a concentration of 0.09% active CAPB was bw No adverse effect tested for carcinogenicity using groups of 60 observed NOAEL 950 mg/kg bw/day (subchronic, male and female random-bred Swiss Webster mice from the Eppley colony. 64 The rat) formulation also contained 5% propylene glycol, 4% benzyl alcohol, 0.6%CIR Panel Book Page 51 Kelzan (xanthan gum), 0.9% lactic acid, 0.04% fragrance, and less than 0.1% each of the disperse brown, red, yellow, and blue dyes. A dose of 0.05 ml per mouse was applied 3 times weekly for 20 months to interscapular skin that was clipped free of hair and shaved. Mortality, behavior, and physical appearance of the mice were observed daily. Dermal changes in particular were noted. Body weights were recorded weekly. Ten males and 10 females from each group were killed at 9 months for a hematological study, urinalysis, and necropsy. At termination, all mice were necropsied, and the tissues were examined microscopically. No adverse effects were noted on average body weight gains, survival, hematological or urinalysis values in any group. Varying degrees of chronic inflammation of the skin were seen in all groups, including controls. Other lesions occurred, but were considered unrelated to hair dye treatment. The incidence of neoplasms in treated animals did not differ significantly from control

groups







### **Exposure and risk characterisation**

### **Shower Gel**

Version 2

2022-04-29 06:39

Product type: Bath gel

Daily amount applied q<sub>x</sub> (g/d): 18.67

Retention factor: 0.01

Dermal exposure: applicable

Oral exposure: unlikely

Inhalation exposure: unlikely









## Target population adult (60 Kg)

INCI	%	External Dermal Exposure (mg/day)	POD value (mg/kg bw/d)	SED dermal (mg/ Kg bw/d)	MoS dermal	SED oral (mg/ Kg bw/d)	MoS oral	SED inhalation (mg/ Kg bw/d)	MoS inhalation	Regulatory status	Substance Reasoning
AQUA	64.0000	119.4880		0.9957	0.0000	1.9915	0.0000	NaN	NaN	There is no harmonised classification.	The most common solvent. Safe for all uses in cosmetic products
GLYCERIN	12.4880	23.3151		0.0389	0.0000	0.3886	0.0000	NaN	NaN	There is no harmonised classification.	Glycerin is a naturally occurring alcohol compound and a component of many lipids. There is naturally occurring glycerin, derived from plants and animals, and synthetic glycerin, obtained from nontriglyceride sources. It is traditionally and largely used in cosmetic products, is the third most frequently reported cosmetic ingredient. after water and fragrance. Glycerin is considered generally recognized as safe (GRAS) for food packaging and as a multiple-purpose food substance.  The CIR Expert Panel concluded that glycerin is safe when used as cosmetic ingredient up to 78,5%.
COCAMIDOPROPYL BETAINE	10.0000	18.6700	500.0	0.1556	3213.7118	0.3112	1606.8559	NaN	NaN	There is no harmonised classification.	Cocamidopropyl betaine is a synthetic surfactant. Due to the irritation potential of CAPB, it is concluded that the maximum activity of CAPB used in leave-on cosmetic formulations should not exceed 3.0 percent. The limitation is expressed as a 10 percent v/v dilution of a commercial sample that has an activity of 30 percent. The use of CAPB in rinse-off products is considered to be safe as currently applied. The impurities AA and DMAPA are most critical, as they have been shown to be responsible for skin sensitation reactions. The CIR Expert Panel concluded that, because of these ingredients presence, no other significant toxicity



The most common solvent. Safe for all uses in cosmetic products

Glycerin is a naturally occurring alcohol compound and a component of many lipids. There is naturally occurring glycerin, derived from plants and animals, and synthetic glycerin, obtained from nontriglyceride sources. It is traditionally and largely used in cosmetic products, is the third most frequently reported cosmetic ingredient. after water and fragrance. Glycerin is considered generally recognized as safe (GRAS) for food packaging and as a multiple-purpose food substance.

The CIR Expert Panel concluded that glycerin is safe when used as cosmetic ingredient up to 78.5%.

cosmetic ingredient up to 78,5%. Cocamidopropyl betaine is a synthetic surfactant. Due to the irritation potential of CAPB, it is concluded that the maximum activity of CAPB used in leave-on cosmetic formulations should not exceed 3.0 percent. The limitation is expressed as a 10 percent v/v dilution of a commercial sample that has an activity of 30 percent. The use of CAPB in rinse-off products is considered to be safe as currently applied. The impurities AA and DMAPA are most critical, as they have been shown to be responsible for skin sensitation reactions. The CIR Expert Panel concluded that, because of these ingredients

presence, no other significant toxicity

Cocamidopropyl betaine is safe for use as cosmetic ingredients when formulated to be nonsensitizing (which may be based on a quantitative risk assessment). Sodium Laureth Sulfate is the sodium salt of sulfated ethoxylated lauryl alcohol. The potential to produce irritation exists, but in practice it is not regularly seen to be irritating because of the formulations in which it is used. The CIR Expert Panel concluded that Sodium Laureth Sulfate is safe up to 50% when formulated to be non-irritating. According to ECHA webpage the dermal absorpition value is 0,9%. According to the classification provided by companies to ECHA in CLP notifications this substance causes serious eye damage, causes skin irritation and may cause an allergic skin reaction. Aloe Barbadensis Leaf Juice is the juice expressed from the leaves of the aloe, Aloe barbadensis, Liliaceae. Aloe is a flowering succulent plant, its leaves are largely used for pharmaceutical purposes. Aloe has a long history as a medicine and skin care aid. For over 6.000 years aloe was used for a wide range of ailments. The word "Aloe" in pharmacopoeias and formularies refers to the herbal substance derived from the dried leaf juice. This has always created confusion

due to the fact that the leaves are the

source of two products: latex and

prepared by cutting transversely the

inclined so that the juice contained in

the specialised pericyclic cells and

parenchyma flow out in about 6 h.

This juice is allowed to dry with or

without the aid of heat. It contains a

number of anthraguinones. Aloe gel

gel. Latex or aloe dried juice is

leaf near the base and taking it

sometimes in the adjacent

is a colourless mucilaginous gel obtained from the parenchymatous cells of the leaves. The mucilaginous parenchymous tissue is excised from fresh leaves. Therefore the leaves are "filleted", that means that the external green parts of the leaves are peeled. Depending on whether the anthranoid-containing cells beneath are also removed, the gel is free of anthranoids or not. The fillets are immediately utilised for preparations or lyophilised and kept dry until use. In general the dried juice is orally used for its laxative effects while the gel is topically used for cosmetic products. It is important to notice that aloe barbadensisderived ingredients were generally not toxic, however the anthraquinones identified as impurities, like aloe-emodin, are known to be genotoxic and carcinogen substances and phototoxicant. CIR Expert panel concluded that Aloe Barbadensis Leaf Juice is safe when used as cosmetic ingredient if anthraquinone levels in the ingredients do not exceed 50

Xanthan Gum is a polysaccharide composed of glucose, glucuronic acid, 6-acetylmannose, and 4,6pyruvylated mannose. Largely used in cosmetic products and it is an authorised food additive in the European Union (E 415). Although polysaccharide gums are produced primarily by microbial sources, the cosmetic ingredients are purified during manufacture, thus microbial contamination is not a concern. It appears not to be significantly absorbed through the skin and would have negligible bioavailability, therefore we can consider a precautionary dermal absorption of 10%. The available information indicates that incidental inhalation

would not be a significant route of exposure that might lead to local respiratory or systemic effects. It did not produce systemic toxicity in oral studies; polysaccharide gums are not reproductive or developmental toxicants; are not genotoxic; and are not considered irritants or sensitizers. The CIR Expert Panel concluded that Xanthan Gum is safe to be used as cosmetic ingredient up to 6%

According to the classification provided by companies to ECHA in CLP notifications this substance causes serious eye irritation and causes skin irritation.







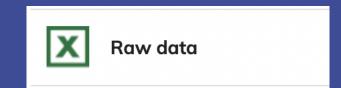
#### Ingredients monography (summary)



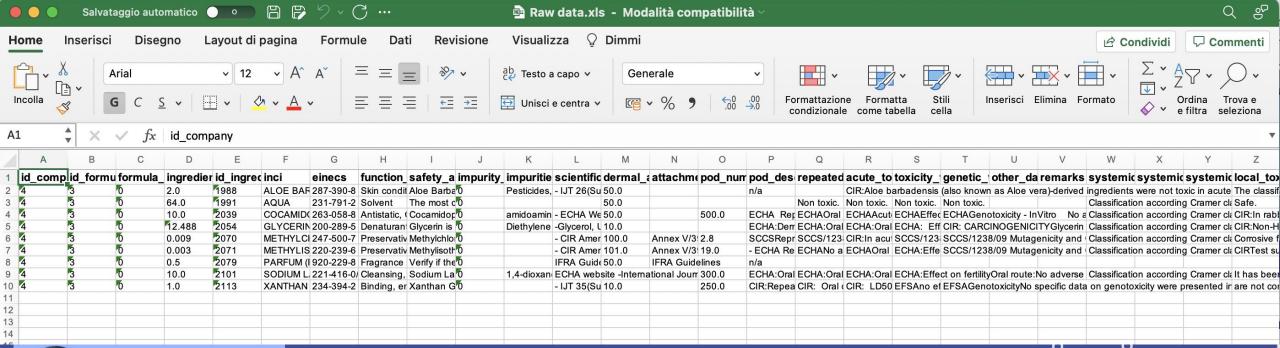
- ALOE BARBADENSIS LEAF JUICE.pdf
- AQUA.pdf
- COCAMIDOPROPYL BETAINE.pdf
- GLYCERIN.pdf
- METHYLCHLOROISOTHIAZOLINONE.pdf
- METHYLISOTHIAZOLINONE.pdf
- PARFUM (FRAGRANCE).pdf
- SODIUM LAURETH SULFATE.pdf
- XANTHAN GUM.pdf





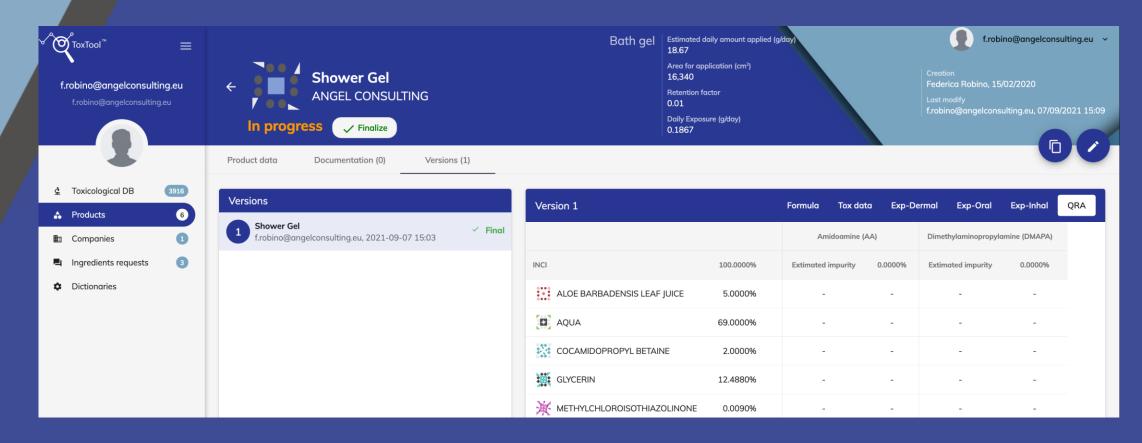








### Versioni-Revisioni





## **Endorsment**



Scientific Supervision: Università di Genova, Dipartimento DISTAV (Scienze della Terra, Ambiente e Vita)





- rappresentativo: presenti fin da subito oltre il 90% degli ingredienti impiegati nel settore cosmetico possono essere richiesti tutti gli ingredienti ancora non presenti
- in evoluzione: la SCCS *Notes of Guidance* guida il nostro *tool* con dati e *frame* tossicologici sempre aggiornati e pronti alle nuove sfide
- **strutturato**: i dati di letteratura scientifica sono una base indispensabile. Implementati con le più recenti metodologie *in silico*, grazie alle elaborazioni realizzate dai nostri esperti con piattaforme europee validate da ECHA e SCCS. Un *reasoning* per ogni ingrediente, così da supportare al meglio la valutazione del prodotto finito







- aggiornato: un team referenziato con oltre 30 anni di esperienza nel settore e supervisione scientifica universitaria indipendente
- user driven: aziende cosmetiche e safety assessor hanno costruito le fondamenta di questo strumento con i loro consigli. Gli utenti (standard e premium) potranno richiedere dati su ingredienti non ancora presenti nel tool







- user friendly: non sono necessari corsi, installazioni locali, aggiornamenti, i manuali d'uso.
- condiviso: i dati sono condivisi fra i Safety Assessor e i contributor che contribuiranno a implementare in maniera sempre più efficace il database. I documenti creati per aiutarti nella realizzazione di PIF e CPSR riporteranno un QR code di sicurezza ToxTool™, così da incrementare la loro rappresentatività





## Coming soon...

Maggio 2022: webinar di presentazione Stay Tuned!









Un nuovo strumento di competitività per l'area *regulatory affairs* di ogni azienda cosmetica

# Grazie per l'attenzione!

Powered by



Matteo Zanotti Russo Cosmoprof Bologna, 29 Aprile 2022

