

Research & Management Consultancy

Partners: M. C. Perry B.Sc.(Hons), C.Biol., MSB., M.T.O.P.R.A. R. G. Perry

Consultants to the Pharmaceutical, Chemical and Allied Industries

R & M Consultancy
Sterling House
3A New Street
Ledbury
Herefordshire
HR8 2DX UK

Telephone +44 (0)1531 635008
Facsimile +44 (0)1531 634844

E-mail: enquiries@rm-consult.co.uk
Web site: www.rm-consult.co.uk

Conditioner safety assessment

This Safety Assessment is for a GK Hair Taming System with Juvexin Leave In Cream formulation dated 6 March 2013.

Part A

Cosmetic Product Safety Information

1 Quantitative and Qualitative composition

INCI	CAS	EINECS	Function	%
Aqua	7732-18-5	231-791-2	Solvent	75-100
Amodimethicone	71750-80-6	-	Antistatic	1-5
Cetrimonium Chloride	112-02-7	203-928-6	Antistatic/ hair conditioner	0.1-1
Cetyl Alcohol	36653-82-4	253-149-0	Emollient/ hair conditioner	0.1-1
Stearyl alcohol	112-92-5	204-017-6	Emollient/ emulsion stabiliser	0.1-1
Acetamide MEA	142-26-7	205-530-8	Antistatic/ hair conditioner	0.1-1
Keratin	68238-35-7	269-409-1	Antistatic/film former /hair conditioner	0.1-1
Panthenol	81-13-0	201-327-3	Antistatic / hair conditioner	0.1-1
Sorbitol	50-70-4	200-061-5	Hair conditioner/ humectant	0.1-1
Sodium Cocoyl Collagen Amino acid	-	-	Antistatic/ hair conditioner/surfactant	0.1-1
Cocoyl Sarcosine	68411-97-2	270-156-4	Hair conditioner/ surfactant	0.1-1
Wheat Germ Acid	68938-32-9	-	Emollient/ emulsifier/ hair conditioner	0.1-1
Triticum Vulgare (Wheat) Germ Oil	84012-44-2	281-689-7	Emollient/ hair conditioner	0.1-1
Linoleic Acid	60-33-3	200-470-9	Antistatic/ emollient/hair conditioner	0.1-1
Sulfur	7704-34-9	231-722-6	Antistatic/ hair conditioner	0.1-1
Polysorbate 80	9005-65-6	-	Emulsifier/ surfactant	0.1-1
Oleth-10	9004-98-2	24871-34-9	Emulsifier/ surfactant	0.1-1
Simmondsia Chinensis (Jojoba) Seed Oil	90045-98-0	289-964-3	Emollient/ hair conditioner	0.1-1
Tocopheryl Acetate	58-95-7	200-405-4	Antioxidant	0.1-1
Hydrolyzed Glycosaminoglycans	-	-	Humectant	0.1-1
Fragrance	-	-	Aroma	0.2
Methylchloroisothiazolinone	26172-55-4	247-500-7	Preservative	0.001125
Methylisothiazolinone	2682-20-4	220-239-6	Preservative	0.000375

2 Physical/chemical characteristics and stability of the cosmetic product

2.1 Physical/chemical characteristics of substances or mixtures.

The individual ingredients are purchased against an agreed specification and are supplied with a certificate of conformity to that specification. The physical/chemical specification of

the ingredients are well known and commonly used in similar products. Their inclusions in the finished product at the specified concentrations do not give rise to any concerns.

There are no nanomaterials present in the finished cosmetic product either by design or as accidental byproducts of the manufacturing processes.

2.2 Physical/chemical characteristics of finished cosmetic product

The physical/chemical characteristics of the finished cosmetic product are confirmed against an in-house specification. There are no novel characteristics and the finished product is similar to other cosmetic products currently marketed

2.3 Stability of cosmetic product

Stability studies where colour, odour, appearance, pH and viscosity were recorded at various times up to 3 months on samples stored at room temperature or 45°C/75%RH support a shelf life of 24 months and a Period After Opening of 24 months.

3 Microbiological quality

3.3.1 Microbiological quality of substances or mixtures

The microbiological quality of the ingredients conforms to the agreed specification and stated on the certificate of conformity.

3.2 Microbiological quality of finished cosmetic product

The finished product meets or exceeds the requirements of microbial testing (USP 29).

4 Impurities, traces, package information

4.1 Purity of substances or mixtures

A statement has been provided by the bulk manufacturer that verifies that the cosmetic product does conform with the cosmetic Directive 76/768/ EC and any presence of traces of substances is within the allowed limits.

The ingredients in the formulation do not indicate any potential interactions that may result in unintended impurities being present in the finished cosmetic product.

4.2 Evidence of technical unavailability of traces of prohibited substances

There is no evidence of traces of prohibitive substances and none would be expected to be present in this formulation. All finished cosmetic products are manufactured according to Good Manufacturing Practice (GMP) with GMP certificates on file.

4.3 Relevant characteristics of package information

The product is presented as a 10 and 130ml styrene acrylonitrile bottle, polypropylene middle. Polypropylene pump, polyethylene piston and styrene acrylonitrile cap.

The immediate packaging used for the finished cosmetic product has been previously used for similar formulation without any reported problems.

5 Normal and reasonable foreseeable use

The finished cosmetic product is intended for use as a conditioner. It is therefore expected to be applied to the skin.

6 Exposure to the cosmetic product

SCCS Notes of Guidance 7th Revision [SCCS/1416/11] quotes an estimated daily amount of conditioner applied to be 3.92g. With a retention factor of 1 (ie not rinse off) the calculated daily exposure is 3.92g /day and the calculated relative daily exposure is 65.33mg/kg bodyweight/day based on a human bodyweight of 60kg.

7 Exposure to the substances

As stated above, based on the assumption that 3.92g of conditioner is applied daily, the table below gives the equivalent daily application values for each ingredient both as mg/day and mg/kg bodyweight/day.

INCI	%	Equiv daily application *	
		(mg)	(mg/kg bodyweight/day)
Aqua	75-100	3920	65.3333
Amodimethicone	1-5	196	32.666
Cetrimonium Chloride	0.1-1	39.2	0.6533
Cetyl Alcohol	0.1-1	39.2	0.6533
Stearyl alcohol	0.1-1	39.2	0.6533
Acetamide MEA	0.1-1	39.2	0.6533
Keratin	0.1-1	39.2	0.6533
Panthenol	0.1-1	39.2	0.6533
Sorbitol	0.1-1	39.2	0.6533
Sodium Cocoyl Collagen Amino acid	0.1-1	39.2	0.6533
Cocoyl Sarcosine	0.1-1	39.2	0.6533
Wheat Germ Acid	0.1-1	39.2	0.6533
Triticum Vulgare (Wheat) Germ Oil	0.1-1	39.2	0.6533
Linoleic Acid	0.1-1	39.2	0.6533
Sulfur	0.1-1	39.2	0.6533
Polysorbate 80	0.1-1	39.2	0.6533
Oleth-10	0.1-1	39.2	0.6533
Simmondsia Chinensis (Jojoba) Seed Oil	0.1-1	39.2	0.6533
Tocopheryl Acetate	0.1-1	39.2	0.6533
Hydrolyzed Glycosaminoglycans	0.1-1	39.2	0.6533
Fragrance	0.2	7.84	0.1307
Methylchloroisothiazolinone	0.001125	0.0041	0.0006
Methylisothiazolinone	0.000375	0.00047	0.0001

* based on the top range value

Several of the ingredients have restrictions on their maximum concentration in the final product:-

Ingredient	% in final product	Max permitted	Complies
Methylchloroisothiazolinone	0.001125	0.0015	Yes
Methylisothiazolinone	0.000375	0.0005	Yes

The body's exposure to the remaining ingredients can be calculated based on the estimated daily application of 0.0392g of conditioner. In the absence of absorption data the assumption is made that 100% is absorbed, representing a worst-case scenario.

8 Toxicological profile of the substances

8.1 General considerations on Toxicological Profile as part of the Safety Assessment

The exposure to the ingredients has been discussed in section 5, 6 and 7 above.

The toxicological profile of this formulation is similar to many cosmetic products with well-known ingredients and none of the ingredients are novel.

There are specific restrictions on the concentration of some of the ingredients as listed in 7 above.

8.2 Toxicological profile of substances for all the relevant toxicological endpoints

There are no toxicological concerns with the ingredients and their presence.

8.3 Consideration of all the significant routes of absorption

As the product is applied to the skin, the main route of absorption will be dermal.

No other routes apply when used as intended.

8.4 Consideration of systemic effects and calculation of the margin of Safety

INCI Name	Conc (%)	Dermal absorption (%)	SED (mg/kg bodyweight/day)	MoS
Aqua	75-100	100	65.3333	nc
Amodimethicone	1-5	100	32.666	nc
Cetrimonium Chloride	0.1-1	100	0.6533	382
Cetyl Alcohol	0.1-1	100	0.6533	3979
Stearyl alcohol	0.1-1	100	0.6533	3826
Acetamide MEA	0.1-1	100	0.6533	nc
Keratin	0.1-1	100	0.6533	nc
Panthenol	0.1-1	100	0.6533	1530
Sorbitol	0.1-1	100	0.6533	1530
Sodium Cocoyl Collagen Amino acid	0.1-1	100	0.6533	nc
Cocoyl Sarcosine	0.1-1	100	0.6533	nc
Wheat Germ Acid	0.1-1	100	0.6533	nc
Triticum Vulgare (Wheat) Germ Oil	0.1-1	100	0.6533	1530
Linoleic Acid	0.1-1	100	0.6533	nc
Sulfur	0.1-1	100	0.6533	3061
Polysorbate 80	0.1-1	100	0.6533	3826
Oleth-10	0.1-1	100	0.6533	nc
Simmondsia Chinensis (Jojoba) Seed Oil	0.1-1	100	0.6533	nc
Tocopheryl Acetate	0.1-1	100	0.6533	3061
Hydrolyzed Glycosaminoglycans	0.1-1	100	0.6533	nc
Fragrance	0.2	100	0.1307	Within IFRA statement limits
Methylchloroisothiazolinone	0.001125	100	0.0006	Within SCCP max permitted concentration
Methylisothiazolinone	0.000375	100	0.0001	Within SCCP max permitted concentration

nc Not calculated

The margin of safety (MoS) is calculated as:-

$\text{MoS} = \frac{\text{NOAEL}}{\text{SED}}$	Where	MoS - margin of safety NOAEL - No observable adverse effect level SED Systemic Exposure Dosage
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A MoS of 100 or more indicates a reasonable margin on safety for each ingredient.

All MoSs, where calculable, were in excess of 100

It is therefore considered unlikely that there would be any systemic effects for the product user.

8.5 Impact on the toxicological profile of certain characteristics of the substances or the product

The impurity profile of the ingredients is well documented, the ingredients are well-known and have been extensively used in a range cosmetic products for several years.

It is therefore considered that the toxicological impact of the ingredients or the finished product is negligible.

8.6 Use of read-across should be substantiated and justified

In previous years similar formulations have been marketed using the same or very similar product formulation. The formulations are sufficiently similar to allow “read-across” of safety data.

8.7 Identification of the sources of information

Safety data has been obtained from SCCS opinions, the use of European Commission database, CosIng, internet-based databases such as PubMed, TOXLINE, MEDLINE, RTECS and from data supplied by ingredient and product manufacturers.

9 Undesirable effects and serious undesirable effects

Systems are in place to record and collate any and all reports of adverse events. These will be listed and supplied to the safety assessor in a regular manner and this safety assessment may be revised in the light of these adverse event reports.

No adverse events have been reported for similar formulations over the last 12 months.

10 Other information on the cosmetic product

No other information could be found relating to the safety of the ingredients or the finished cosmetic product.

Annex 1 - Part B Cosmetic product safety assessment

This Safety Assessment is for a GK Hair Taming System with Juvexin Leave In Cream formulation dated 6 March 2013.

1 Assessment Conclusion

This safety assessment for human health is based upon the information available at this date. Reviews of this assessment will be made as and when new information becomes available. If significant adverse reactions are reported by consumers, a new evaluation will be made and any appropriate action taken.

It is recommended that reviews of the supporting data are conducted every 2 years.

Based on the information provided and reviewed, it is considered that the formulations listed above complies with Regulation (EC) No 1223/2009 of the European Parliament and the Council of 30 November 2009 cosmetic product (Official Journal L 342, 22/12/2009 P. 0059-0209)

2 Labelled warnings and instructions for use

The proposed label for this cosmetic product presentation is acceptable and no additions are required.

3 Reasoning

3.1 Safety Evaluation of substances and/or mixtures

All ingredients have a well-known toxicological profile. They have been freely used in similar products for many years without adverse health effects.

The information provided is sufficient to provide an informed safety evaluation of the selection of the ingredients and therefore it is considered that no additional data needs to be generated to support this evaluation.

3.2 Safety Evaluation of the Cosmetic Product

The assessment of the ingredients, the finished cosmetic product, immediate packaging, intended use and product label has confirmed that the conditioner product complies with Regulation (EC) No 1223/2009 of the European Parliament and the Council of 30 November 2009 cosmetic product (Official Journal L 342, 22/12/2009 P. 0059-0209).

Copies of all the supporting documentation are held by Van Tibolli Beauty Ltd (Ireland).

4 Assessors Credentials and approval of part B

It is concluded that the above formulations conform to Regulation No 1223/2009 and can therefore be marketed in the EU.

The qualifications and experience of the assessor is provided below.



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M C Perry B.Sc., C.Biol., MSB., MTOPRA

Dated 4 July 2013

INFORMATION ON THE AUTHOR

Name: Martin Cyril Perry

Qualifications: B.Sc. (Hons.), C.Biol., MSB, M.T.O.P.R.A.

UK registered toxicologist (Listed by Institute of Biology/British Toxicology Society)

European registered toxicologist (Listed by Eurotox)

Membership of Learned Societies

British Toxicology Society

European Society of Toxicology

The Organisation for Professionals in Regulatory Affairs

Society of Biology

Summary of Career

R & M Consultancy, Ledbury, Herefordshire. 1989-date
Consultant.

Cph (UK) Ltd., Malvern, Worcestershire. 1988-89
Technical manager.

Toxicol Laboratories Ltd., Ledbury, Herefordshire. 1977-88
Head of General Toxicology.

Life Science Research, Stock, Essex 1973-77
Toxicology supervisor, general toxicology.

Fisons Agrochemical Division, Saffron Walden, Essex. 1972-73
Research scientist, toxicology department.

Sandoz, Basle, Switzerland. 1972
Research technician, pharmacology department.

Lister Institute for Preventative Medicine, London. 1970-71
Research assistant, biochemistry department.

Pfizer, Sandwich, Kent. 1967
Animal technician, toxicology department.