

Exposure considerations when assuring human safety of cosmetic ingredients without animal testing

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Data on how humans are exposed to cosmetic ingredients

Consumers

Table 3A: Daily exposure levels for different cosmetic product categories in Europe, calculated by multiplying daily amounts (Hall *et al.*, 2007, 2011) and f_{ret}.

| Product type | Estimated daily amount applied q _x (g/d) | Relative daily amount applied ¹ q _{x/bw} (mg/kg bw/d) | Retention factor ² f _{ret} | Calculated daily exposure E _{product} (g/d) | Calculated relative daily exposure ¹ E _{product /bw} (mg/kg bw/d) |
|---------------------------|---|---|--|--|---|
| Bathing, showering | | | | | |
| Shower gel | 18.67 | 279.20 | 0.01 | 0.19 | 2.79 |
| Hair care | | | | | |
| Shampoo | 10.46 | 150.49 | 0.01 | 0.11 | 1.51 |
| Hair styling products | 4.00 | 57.40 | 0.10 | 0.40 | 5.74 |
| Skin care | | | | | |
| Body lotion | 7.82 | 123.20 | 1.00 | 7.82 | 123.20 |
| Face cream | 1.54 | 24.14 | 1.00 | 1.54 | 24.14 |
| Hand cream | 2.16 | 32.70 | 1.00 | 2.16 | 32.70 |
| Make-up | | | | | |
| Liquid foundation | 0.51 | 7.90 | 1.00 | 0.51 | 7.90 |
| Lipstick, lip salve | 0.057 | 0.90 | 1.00 | 0.057 | 0.90 |
| Deodorant | | | | | |
| Deodorant non-spray | 1.50 | 22.08 | 1.00 | 1.50 | 22.08 |
| Deodorant spray | 0.69 | 10.00 | 1.00 | 0.69 | 10.00 |
| Oral hygiene | | | | | |
| Toothpaste (adult) | 2.75 | 43.29 | 0.05 | 0.138 | 2.16 |
| Mouthwash | 21.62 | 325.40 | 0.10 | 2.16 | 32.54 |



https://ec.europa.eu/health/system/files/2021-04/sccs_o_250_0.pdf



Using probabilistic modelling and aggregate exposure considerations

Workers



X 3: Exposure assessment

pose of exposure assessment under REACH

assessment under REACH includes two elements: (i) characterising the conditions and risk management measures for assessing the exposure to the substance and to the environment; (ii) characterising the exposure to humans and to the environment under these conditions. If no prediction is available, conservative approaches can be used. In case of a no-effect level (NOELC), when available, conservative approaches can be used. If such qualitative or quantitative risk assessment ratios (QRA) can be derived, and if such QRA is appropriate, risk management measures can be based on this information. A qualitative quantitative approach should be used according to the following activities:

1. Hazard analysis
2. Hazard identification
3. Exposure assessment
4. Risk characterisation

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characterisation of the exposure to humans and to the environment under these conditions. The assessor is expected to systematically demonstrate that the exposure was calculated for all hazard and all uses identified, and that it does not lead to adverse effects.

of the conditions of use

such conditions of use may correspond to:

estimates of a plugged-in or external exposure estimation tool (e.g. a software or a model) which releases or exposure have been measured or estimated. Such estimates can be applied to the context of qualitative risk characterisation (see section 8.2.1) are stored in the internal library of the tool and can be associated to the conditions of use. The conditions of use can be associated to the conditions of use into the library:

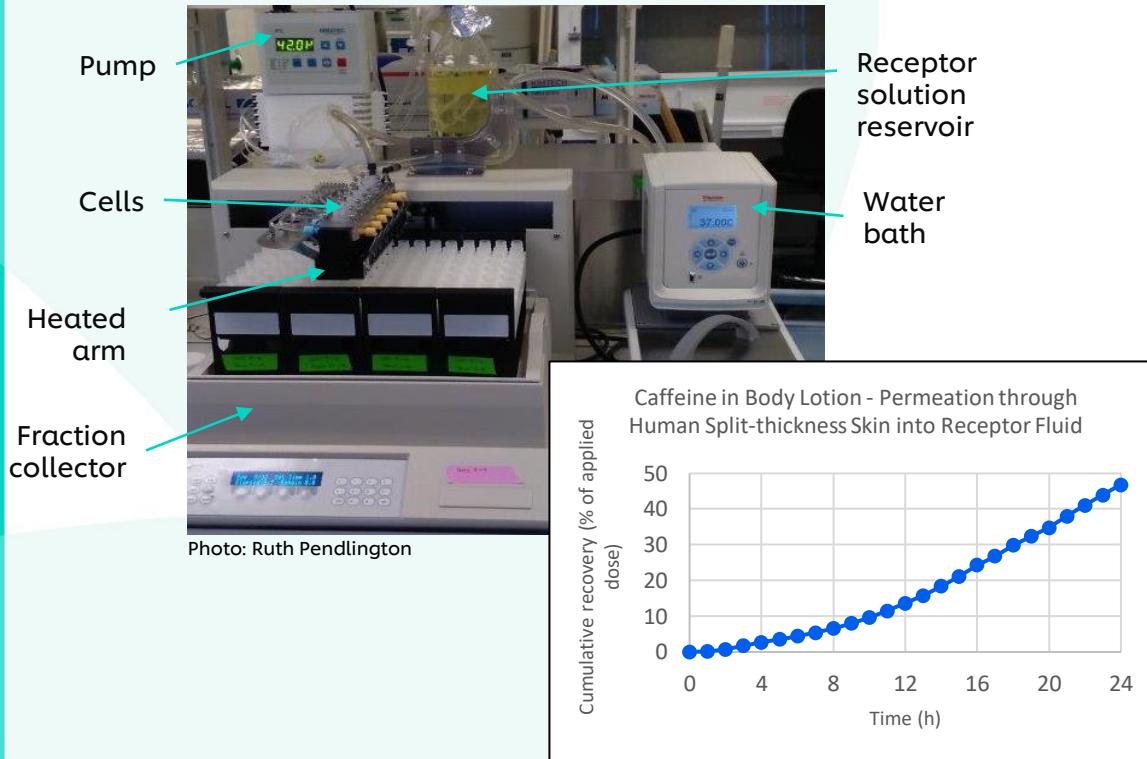
default in Chesar 3 library (called built-in conditions of use) as such, or as part of SMERCS, SWEDS or SCDS. They can be taken into account: water and sediment exposures in the aquatic food chain (freshwater and marine); agricultural soil organisms; predators in the air.

Chesar 3 User manual

https://chesar.echa.europa.eu/documents/736332/8711025/Chesar%203-6_user%20man_en.pdf/65edfa9e-57b8-f334-07f7-afb9841e8099

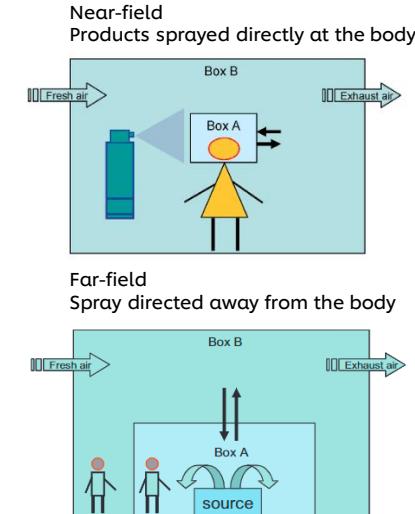
Generating specific information on human exposure

e.g. Skin Penetration



e.g. Inhalation Exposure

Exposure Modelling



Simulated consumer exposure methods



Steiling et al (2014) Toxicology Letters, 227, 41-49

Exposure in Next Generation Risk Assessment (NGRA)

4 Main overriding principles:

- » The overall goal is a human safety risk assessment
- » The assessment is exposure led
- » The assessment is hypothesis driven
- » The assessment is designed to prevent harm



International Cooperation
on Cosmetics Regulation

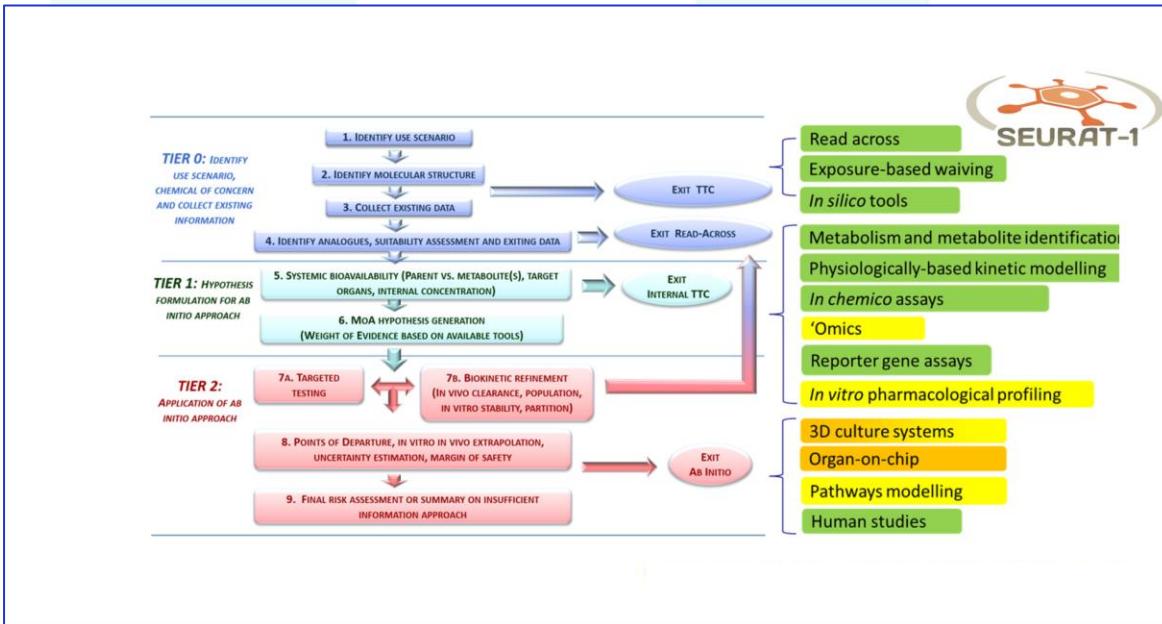
3 Principles describe how a NGRA should be conducted:

- » Following an appropriate appraisal of existing information
- » Using a tiered and iterative approach
- » Using robust and relevant methods and strategies

2 Principles for documenting NGRA:

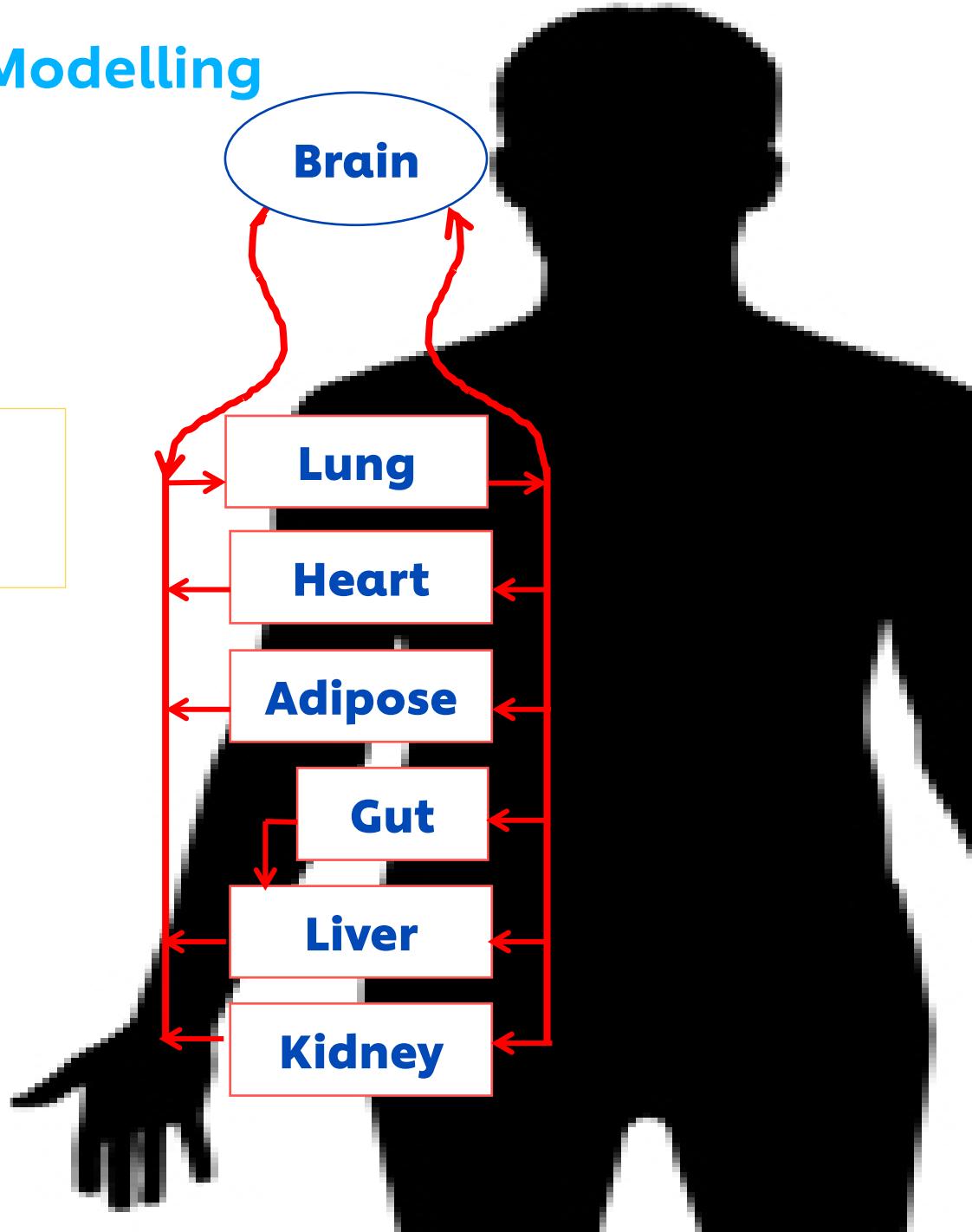
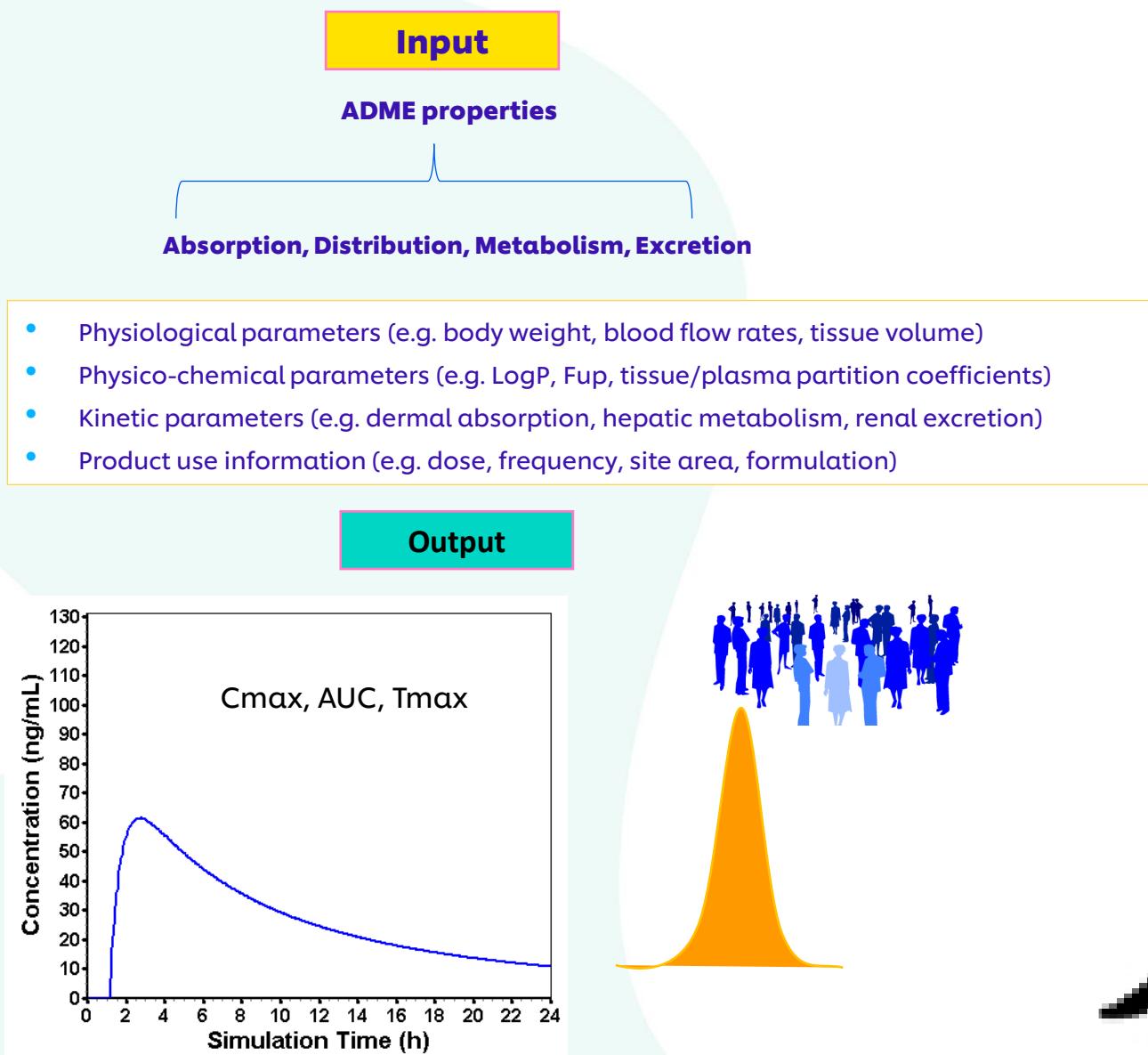
- » Sources of uncertainty should be characterized and documented
- » The logic of the approach should be transparently and documented

[Dent et al \(2018\), Computational Toxicology, 7, 20-26](#)



[Berggren et al \(2017\) Computational Toxicology 4, 31-44](#)

Physiologically-based Kinetic (PBK) Modelling



Exposure estimation: From applied dose to internal exposure based on NAM*s

Level 0:

- Characterise exposure scenario (who, where, how often, and how much)
- Product & chemical information

Level 1:

- Predictions from *in silico* only
- parameterisation & sensitivity

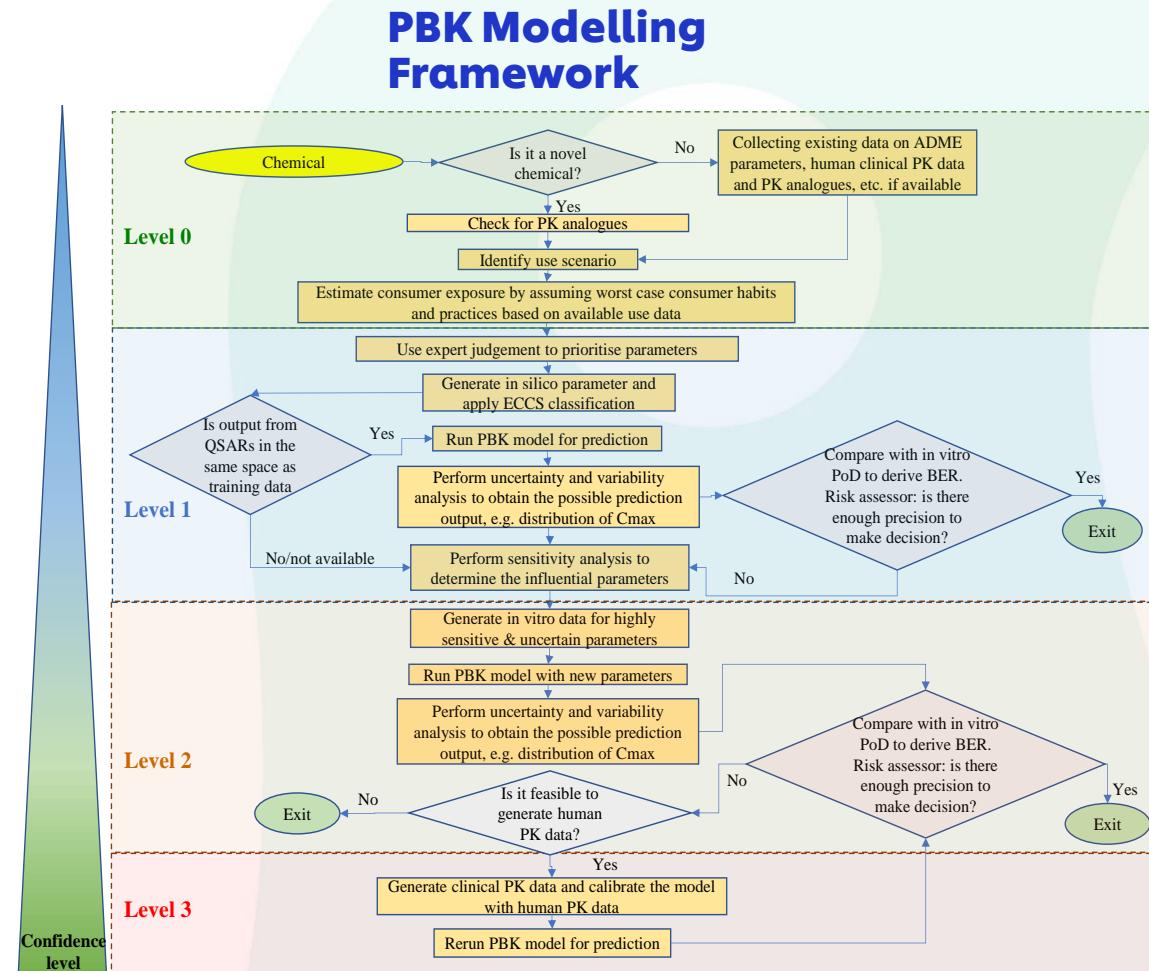
Level 2:

- PBK modelling based on *in vitro* parameterisation

Level 3:

- Generating human PK data for validation or/and calibration

- The progression between levels is closely related to the risk assessment process
- Use tools that are as complex as necessary to make the decision
- move to more complex tools if more data is needed

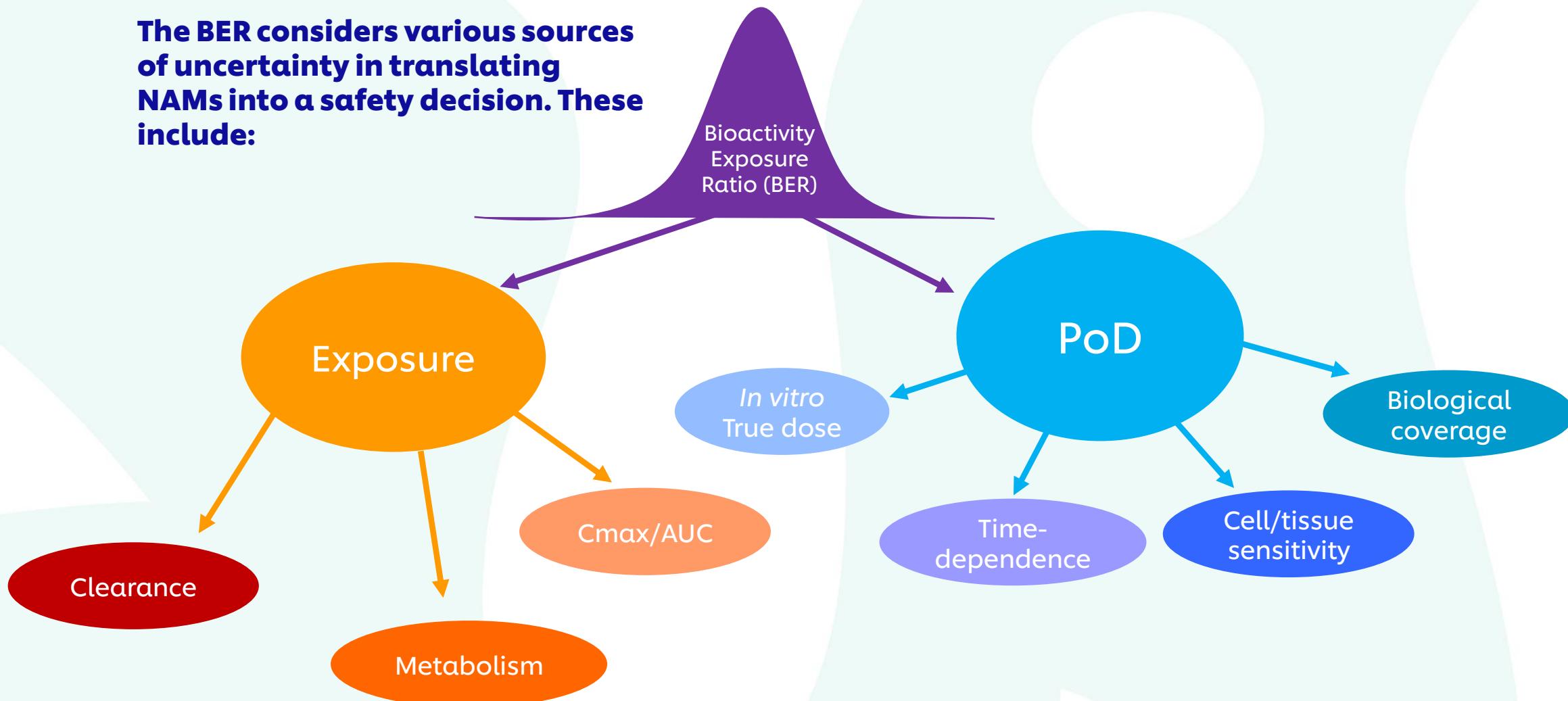


Li et al (2022) Toxicology and Applied Pharmacology, 442, 115992

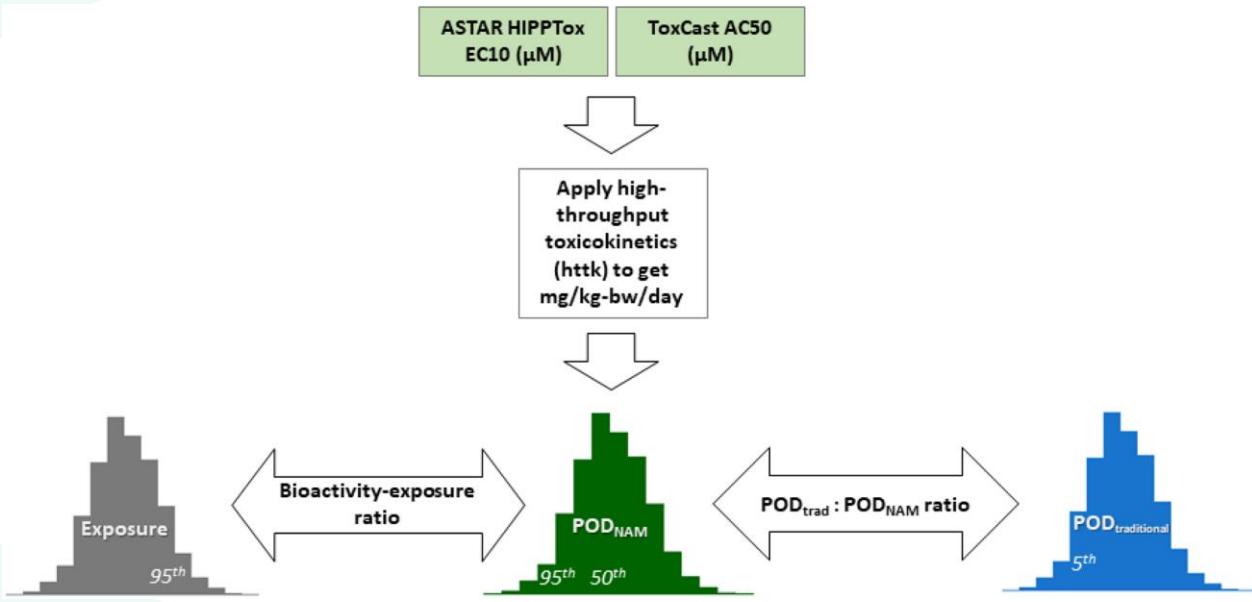
* = New Approach Methodology

Integrating Exposure and Bioactivity Data from NAMs to Make Safety Decisions

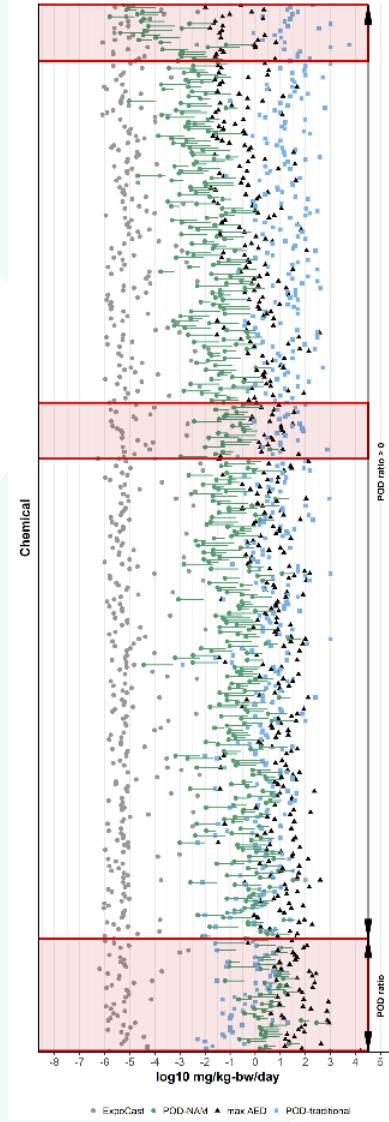
The BER considers various sources of uncertainty in translating NAMs into a safety decision. These include:



APCRA* approach to evaluate the integration of exposure and bioactivity

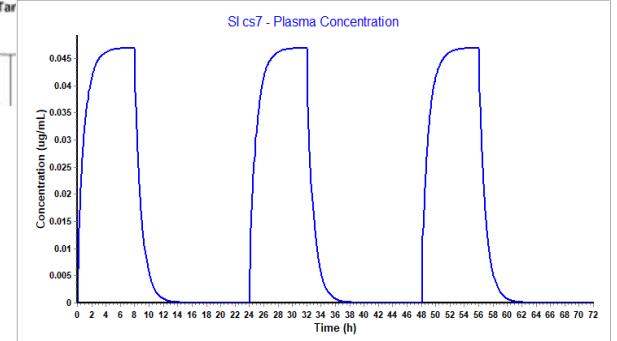
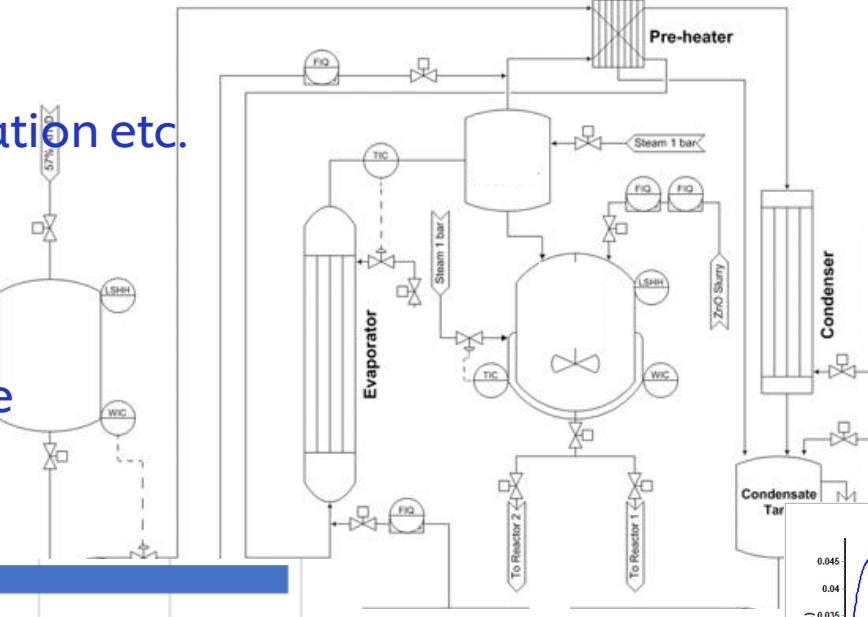
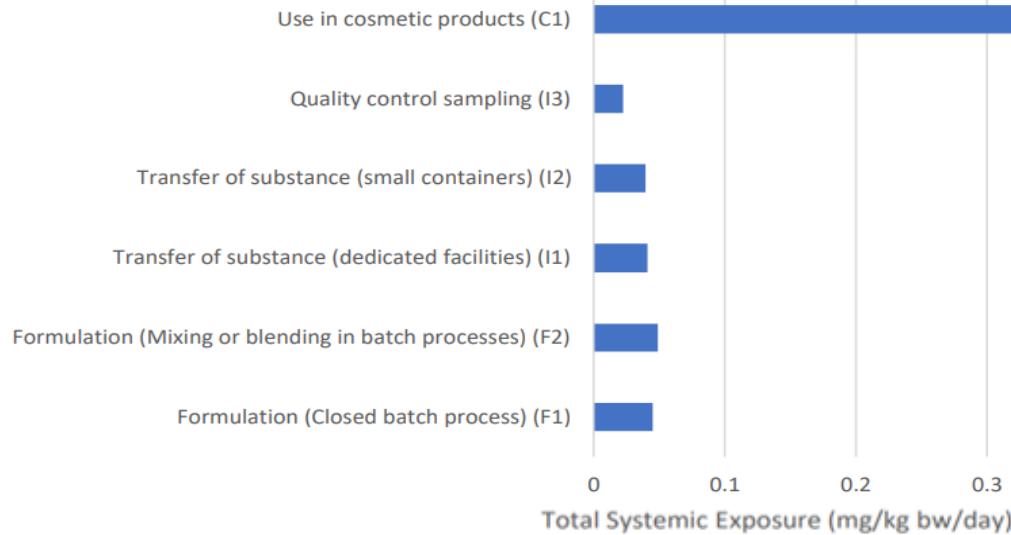


- Evaluation of *in vitro* NAMs, exposure modelling and dose-response models.
- For 89% of the chemicals NAM PoD was more conservative than the traditional POD.
- Bioactivity : exposure ratios (BERs) approach useful for accelerate screening and assessment using NAMs for hazard and exposure.



NGRA and Worker Safety

- Understanding worker exposure
 - Routes
 - Levels of exposure
 - PPE*, engineering controls, ventilation etc.
 - PBK for worker exposure
- NGRA
 - BER approach for worker exposure

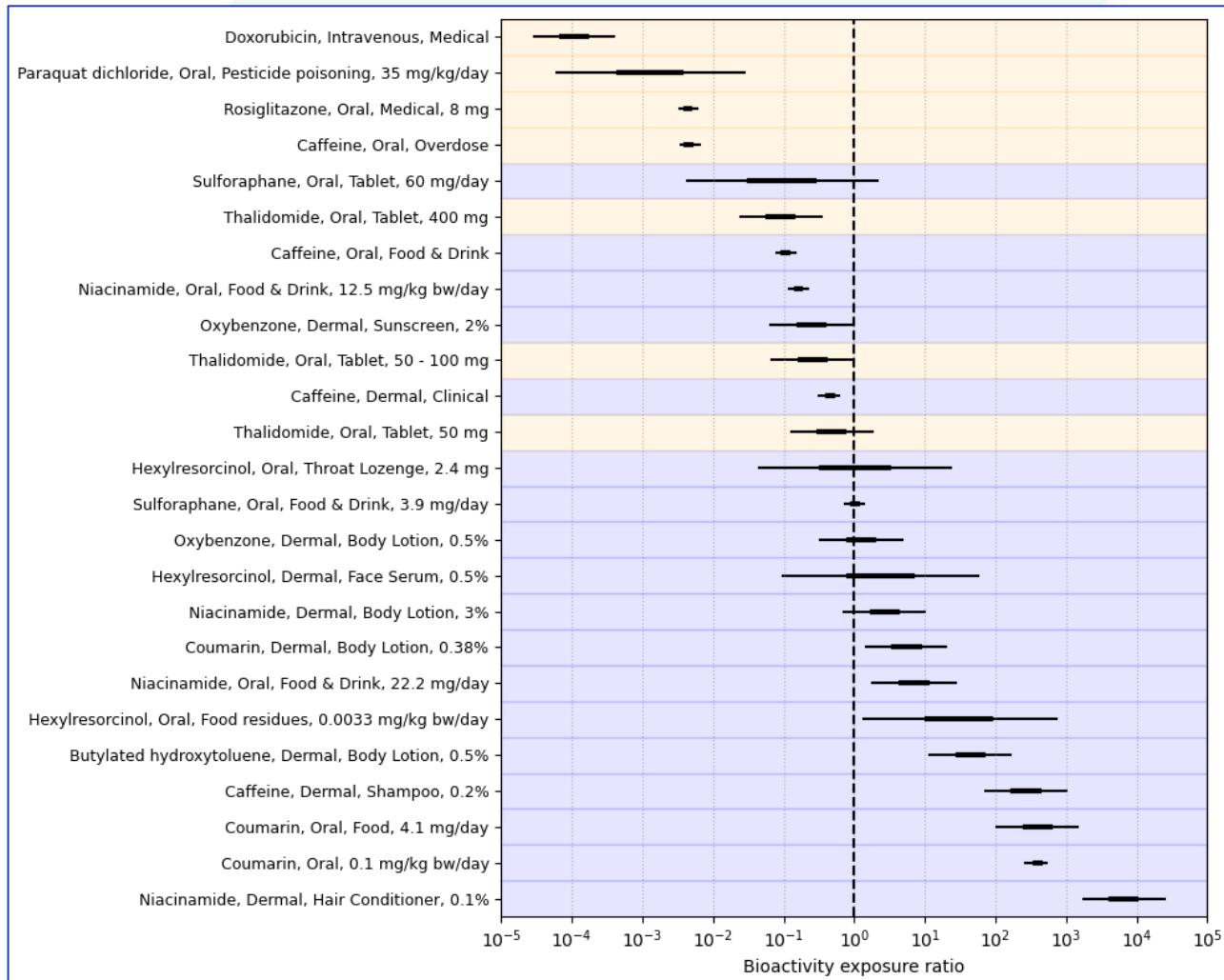
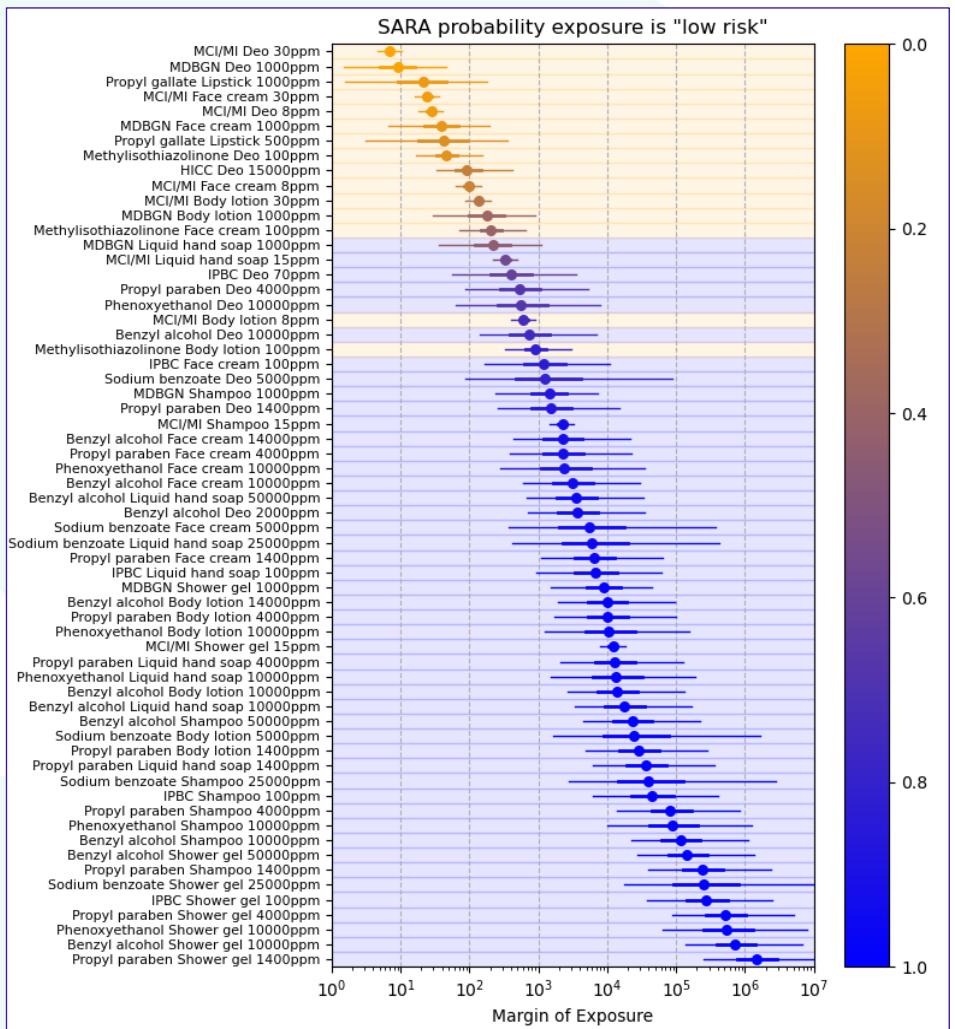


| Dosage Form | Dose (mg) | TD Dose (mg) | Start (h) | End (h) | Physiology or cat file | PBPK Physiologic or pbk file |
|-------------|-----------|--------------|-----------|---------|-----------------------------|-----------------------------------|
| IV Infusion | 8.68 | 0 | 0 | 8 | Human - Physiological - Fed | HumanAmEnPreg1GA30/0/0_75_58kg_28 |
| IV Infusion | 8.68 | 0 | 24 | 32 | Human - Physiological - Fed | HumanAmEnPreg1GA30/0/0_75_58kg_28 |
| IV Infusion | 8.68 | 0 | 48 | 56 | Human - Physiological - Fed | HumanAmEnPreg1GA30/0/0_75_58kg_28 |
| IV Infusion | 8.68 | 0 | 72 | 80 | Human - Physiological - Fed | HumanAmEnPreg1GA30/0/0_75_58kg_28 |
| IV Infusion | 8.68 | 0 | 120 | 128 | Human - Physiological - Fed | HumanAmEnPreg1GA30/0/0_75_58kg_28 |

* PPE = Personal protective equipment



Exposure and Hazard must BOTH be considered when evaluating NAMs for safety assessment



Skin allergy risk assessment:
Reynolds, et al (2021) Reg Tox & Pharmacol, 127, 105075

Systemic safety risk assessment:
Middleton et al (2022) Toxicol Sciences (submitted)

Summary Slide

Safety assessments for cosmetics are always exposure-led

Exposure assessment is equally important for NAM-based consumer safety assessment as it has always been for safety assessments that utilise toxicology data from animals

NAM-based human safety assessments rely on estimates of systemic exposure (PBK), not just habits and practices information

Worker and consumer exposures can be different, both must be defined for NAM-based safety assessment

To fully understand the use and validity of NAMs for safety decision-making, exposure AND hazard information must be used

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