



Scientific Committee on Consumer Safety

SCCS

**GUIDANCE ON THE SAFETY ASSESSMENT OF  
NANOMATERIALS IN COSMETICS**

The SCCS adopted this document

on 30-31 October 2019

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Two independent non-food Scientific Committees provide the Commission with the scientific advice it needs when preparing policy and proposals relating to consumer safety, public health and the environment. The Committees also draw the Commission's attention to the new or emerging problems which may pose an actual or potential threat.

They are: the Scientific Committee on Consumer Safety (SCCS) and the Scientific Committee on Health, Environmental and Emerging Risks (SCHEER) and are made up of scientists appointed in their personal capacity.

In addition, the Commission relies upon the work of the European Food Safety Authority (EFSA), the European Medicines Agency (EMA), the European Centre for Disease prevention and Control (ECDC) and the European Chemicals Agency (ECHA).

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The Committee shall provide Opinions on questions concerning all types of health and safety risks (notably chemical, biological, mechanical and other physical risks) of non-food consumer products (for example: cosmetic products and their ingredients, toys, textiles, clothing, personal care and household products such as detergents, etc.) and services (for example: tattooing, artificial sun tanning, etc.).

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Applicants are invited to visit the SCCS website:

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where they will find a checklist

for submitting a safety dossier of a nanomaterial used in cosmetics.

Applicants are invited to visit the following website for further legislative information:

[https://ec.europa.eu/growth/sectors/cosmetics/legislation\\_en](https://ec.europa.eu/growth/sectors/cosmetics/legislation_en)

This Guidance on nanomaterials should be used in conjunction with the general guidance for the submission of safety dossiers of cosmetic ingredients “The SCCS Notes of Guidance for the testing of cosmetic ingredients and their safety evaluation, 10<sup>th</sup> Revision, SCCS/1602/18” or most recent update.

## **MAIN CHANGES IN THIS REVISION OF THE SCCS GUIDANCE ON THE SAFETY ASSESSMENT OF NANOMATERIALS IN COSMETICS**

### **Main structural changes**

- The general structure of the Nano-Guidance has been changed to give priority to physicochemical characterisation and exposure assessment as starting points in safety assessment of nanomaterials.
- The chapter on hazard identification has been updated for specific considerations needed for nanomaterials with emphasis on replacement alternative methods.
- Summary text boxes have been introduced at the end of each chapter to highlight the key aspects.
- A checklist for submitting a safety dossier to the SCCS has been added (Annex 2).
- Data requirements for human health safety evaluation of a nanomaterial as cosmetic ingredient have been updated.
- Reference and abbreviation lists have been updated.

### **Main changes in contents**

- All sections have been updated to the current state of knowledge in regard to the technical and scientific progress in safety assessment of nanomaterials.
- Text and contents have been changed to indicate priority to non-animal methods.
- New subsections have been introduced (e.g. on coatings, nano-carriers and encapsulated nanomaterials, immunotoxicity, as well as *in silico*, grouping and read-across methods).
- Alternative methods and new approach methodologies (NAMs) have been summarised in Annex 1 on methods for the toxicological evaluation of nanomaterials.

This Guidance may be subject to future changes based on the evolution of science in the field of safety assessment of nanomaterials.

## 1. BACKGROUND

Developments in the field of nanotechnology have also opened up new prospects for innovation in cosmetics. At the same time, the use of very small particles in consumer products has raised concerns over their safety to human health and the environment (Borm *et al.*, 2006; Fadeel *et al.*, 2017; Wu and Tang, 2018). In Europe, the use of nanomaterials in cosmetics is specifically covered under the Cosmetic Regulation (EC) No 1223/2009, which provides a definition of a nanomaterial (NM) and requires premarket notification, safety evaluation, and labelling of NMs intended for use in cosmetic products. In the event that the Commission has concerns regarding the safety of an NM, the Commission shall refer it to the SCCS for a scientific opinion.

In 2012, the Scientific Committee on Consumer Safety (SCCS) published the Guidance on safety assessment of NMs in cosmetics (SCCS/1484/12). A number of new developments have since taken place in the area of NM safety research, and the SCCS has also assessed several safety dossiers on NMs intended for use in cosmetic products (a list can be found at:

[https://ec.europa.eu/health/scientific\\_committees/consumer\\_safety/opinions\\_en](https://ec.europa.eu/health/scientific_committees/consumer_safety/opinions_en)).

A number of issues and questions have been identified by the SCCS regarding the types and quality of the information and data that must form part of the safety dossiers on NMs. In view of this, the SCCS published a memorandum (SCCS/1524/13 Revision of 27 March 2014) to highlight the importance of relevance, adequacy and quality of the data provided in a safety dossier on NMs.

As such, this Guidance is an up-to-date revision of the existing Guidance (SCCS/1484/12) and is aimed at providing an overview of the key issues and data requirements relating to the safety assessment of NMs in cosmetics. In updating the Guidance, the SCCS has considered information available in published literature as well as other relevant documents; such as those published by the European Food Safety Authority (EFSA, 2011, 2018); the European Chemicals Agency (ECHA, 2012, 2017a, b, c); the draft guidance published by the US Food and Drug Administration (FDA, 2014); a report of the International Cooperation on Cosmetics Regulation (ICCR, 2012); as well as reports from the Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR, 2009, 2010, 2015) and the Organisation for Economic Co-operation and Development (OECD, 2009c, 2010a, c).

This Guidance is applicable to any material that meets the criteria for an NM as outlined in the Cosmetic Regulation (EC) No 1223/2009, i.e. "An insoluble or biopersistent and intentionally manufactured material with one or more external dimensions, or an internal structure, on the scale from 1 to 100 nm." In addition, the Commission adopted a Recommendation (2011/696/EU) in 2011 that provides an overarching definition of NM. The Recommendation has proposed a threshold of 50% or more particles of the total number of particles in a material to be in the nanoscale for it to be regarded an NM. This Recommendation has not yet been applied to the definition of NM under Cosmetic Regulation (EC) No 1223/2009. However, it is recommended that it should be kept in view by the Applicants when assessing safety of the materials used in cosmetics that are comprised of or consist small particles, or exhibit a size-related change in properties, behaviour, and/or effects compared to the conventional (bulk) ingredients.

Since the current definition for NM as outlined in the Cosmetic Regulation (EC) No 1223/2009 explicitly mentions insoluble or biopersistent nanomaterials, it may pose a difficulty in regard to interpretation of the term 'insoluble'. For example, NMs that only show a partial solubility may be regarded as 'soluble' in relative terms. However, it needs to be considered whether the nanomaterial is used as a cosmetic ingredient in particulate form, and for a specific functionality. When dealing with the question of solubility, as provided in the current definition, it is important to note that any nano-specific risk may change (even diminish) when a nanomaterial is dissolved. But it is the time over which the dissolution happens that determines the considerations for risk assessment based on either particle risk or soluble substance risk. Partial dissolution over a long period of time may be mistaken to claim that the material is 'soluble', and therefore not a nanomaterial under the scope of the current definition provided in the Cosmetic Regulation (EC) No 1223/2009.

The solubility of NMs used as cosmetic ingredients should also be seen in the context of internationally agreed categories defining various degrees of solubility, such as those provided by the European and US Pharmacopeias (European Pharmacopoeia 10<sup>th</sup> Edition (2019); USP38 and USP 38 NF33). Solubility data are generally drawn from tests in aqueous media and not cosmetic formulations, whereas solubility is dependent on a number of factors such as the solvent medium, pH, temperature, duration, chemical composition of the NM (including impurities), surface chemistry, as well as aging of NMs. The 2012 SCCS Nano Guidance (SCCS/1484/12) has explained that 'Solubility in the context of this guidance means disintegration of a nanomaterial in an aqueous medium or biological environment into molecular components with the loss of nano features'. In this regard, the OECD TG 105 method is not considered suitable as such for measuring solubility of NMs because the method is designed for conventional (non-nano) substances. Since insoluble and partially-soluble NMs are likely to form suspensions of nanoparticles in the solvent media, it is important that any suspended particles are completely removed from the suspension through ultracentrifugation and/or ultrafiltration before carrying out chemical analyses to avoid overestimation of the truly solubilised amounts of the NM.

It should be noted that 'insolubility' is a relative term to explain a material's lack of solubility. Therefore, due consideration must be given when a substance is intended to be used as a cosmetic ingredient in particulate form, and risk assessment must be performed on the particulate form of the material, where applicable. Also, depending on how much material was added to a cosmetic product, the final formulation may still contain (nano)particles even when the material is partially solubilised. Only when the substance is used in fully solubilised form, i.e. not used as a nanomaterial, nano-specific risk assessment may not be needed.

**Table 1: Categorisation of solubility of substances as defined by US and European Pharmacopeias (European Pharmacopoeia 10<sup>th</sup> Edition (2019); USP38 and USP38 NF33).**

Term	Parts of Solvent Required for 1 Part of Solute	Solubility defined in g/L
Very soluble	Less than 1 part	>1000
Freely soluble	1 to 10 parts	100-1000



Soluble	10 to 30 parts	33.3-100
Sparingly soluble	30 to 100 parts	10-33.3
Slightly soluble	100 to 1000 parts	1-10
Very slightly soluble	1000 to 10000 parts	0.1-1
Insoluble*	>10000 parts	<0.1

\*the European Pharmacopeia terms it as 'practically insoluble'

It needs to be remembered that 'solubility' and 'insolubility' are two sides of the same coin, and the degree of insolubility can only be measured in terms of measuring solubility. Although detailed explanation of insolubility/solubility may not have been provided in the legislation, a clear understanding exists in the scientific terms. For example, a 'sparingly soluble' material will, by definition, have virtually most of the material in insoluble particle form. For this reason, the SCCS will consider all those nanomaterials within the scope of the NM definition that fall under the categories of 'practically insoluble', 'very slightly soluble', 'slightly soluble' or 'sparingly soluble'.

The Guidance is aimed at facilitating the Applicants in preparing safety dossiers, and assisting risk assessors and risk managers in the implementation of the provisions of article 16 of Cosmetics Regulation (EC) No 1223/2009. The Regulation imposes strict conditions and timelines for notification and assessment of cosmetic products containing NMs on the Responsible Persons, as well as on the SCCS. All the essential elements that would be required in an NM safety dossier are covered in this Guidance, i.e. physicochemical characterisation, exposure assessment, toxicological evaluation and risk assessment. As such, this Guidance is complementary to the SCCS general Notes of Guidance for specifically addressing safety aspects of NMs, and therefore must be considered in conjunction with the SCCS Notes of Guidance (SCCS/1602/18 or its most recent revision).

The Guidance will be revised and updated by the SCCS when considered appropriate to take account of any new scientific advancements and the new knowledge and experience in this field.

The Cosmetic Regulation (EC) No 1223/2009 specifically covers the risk of nanomaterials (NMs) used in cosmetic products. If there are concerns regarding the safety of an NM, the European Commission refers it to the SCCS for a scientific opinion. The SCCS published a Guidance on safety assessment of NMs in cosmetics in 2012 (SCCS/1484/12), and has since assessed safety of several NMs intended for use in cosmetic products. This Guidance is an up-to-date revision of the 2012 Guidance to take account of new developments in the area of NM safety research to facilitate the applicants and the risk assessors in preparing and assessing safety dossiers on nanomaterials.

## 2. GUIDANCE

In addition to other requirements under relevant regulation, this document is intended to provide specific guidance on the safety evaluation of NMs intended to be used as cosmetic ingredients. NMs may exhibit certain physicochemical properties, biokinetic behaviour, biological interactions, and/or toxicological effects that are different from conventional or bulk form of the same ingredients. This guidance therefore highlights specific aspects that should be considered when testing and reporting data for NMs. It points out the type of data/information that must be provided by the Applicant to the Commission in support of the safety of the NMs intended for use in cosmetics. For the overall safety assessment of cosmetic ingredients, this guidance should be used in conjunction with the SCCS Notes of Guidance (SCCS/1602/18 or more recent version).

The Guidance is structured in separate sections covering Requirements for Safety Assessment (2.1), Physicochemical Characterisation (3), Exposure Assessment (4), Hazard Identification and Dose-Response Characterisation (5), and Risk Assessment (6) of NMs. A summary and conclusions of the main aspects discussed are provided in section 7.

It also needs to be emphasised that the guidance provided in this document is based on the currently available knowledge. As the field of NM safety assessment is still evolving, future revisions will be carried out as necessary when new scientific knowledge becomes available.

### 2.1 Requirements for safety assessment of NM in cosmetics

Regulation (EC) No 1223/2009 specifically covers the use of NMs in cosmetic products. It not only provides a definition of NM, but also a mechanism for the notification, labelling, and consumer safety evaluation of NMs used in cosmetic products.

According to Article 13 (1) of Regulation (EC) No 1223/2009 ('Cosmetics Regulation'), the Responsible Person should notify the Commission prior to placing the cosmetic product on the market. For cosmetic products containing NMs, there is a specific deadline for the notifications, i.e. they should be notified at least six months prior to being placed on the market (Article 16 (3) of the Cosmetics Regulation). If the Commission has concerns about the safety of an NM, it shall request the SCCS to give an opinion within a period of six months (Article 16 (4)). The SCCS evaluation of NM safety is mainly based on the dossier submitted by the Applicant(s). In addition, the SCCS may also use information gathered from published literature and/or received from other stakeholders as a result of the Commission's call for data. In cases where further data/clarifications are needed, the 6-months clock starts again once the necessary data/information is provided by the Applicant.

Certain categories of cosmetic ingredients - e.g. colorants, UV-filters and preservatives, including their nanoforms - can only be used in cosmetic products when 'authorised', i.e. listed in Annexes IV-VI respectively (Article 14 (1) (c)-(e)). These substances are designated to be subjected to SCCS opinions to be 'authorised'. NMs belonging to these categories are not assessed under Article 16 (4)<sup>(1)</sup>. Consequently, the deadline of six months for notification does not apply to products containing NMs that are used as

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<sup>1</sup> Article 16 (2) states that "The provisions of this Article do not apply to NMs used as colorants, UV-filters or preservatives regulated under Article 14, unless expressly specified."

colorants, UV-filters and preservatives. Such products should be notified to the Commission as any other product, i.e. prior to being placed on the market (Article 13).

Where a cosmetic ingredient fulfils the criteria defining an NM as set out in the Cosmetic Regulation (EC) No 1223/2009, Article 2 (1) (k)<sup>2</sup> (or any future revisions), safety data with special considerations to the properties of that specific NM will be required for safety assessment. This will apply to any new or already approved ingredient if it fulfils the criteria for definition of an NM; for example, when an approved ingredient is manufactured by a different process and the generated material is comprised of particles in the nano-scale.

In 2011, the Commission adopted a Recommendation on an overarching definition of NM. According to this Recommendation (2011/696/EU), which is currently under review, the following was proposed:

- 'Nanomaterial' means a natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50% or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm - 100 nm.
- In specific cases and where warranted by concerns for the environment, health, safety or competitiveness the number size distribution threshold of 50% may be replaced by a threshold between 1 and 50%.
- By derogation from the above, fullerenes, graphene flakes and single wall carbon nanotubes with one or more external dimensions below 1 nm should be considered as nanomaterials.

According to the Recommendation, 'particle' means a minute piece of matter with defined physical boundaries, 'agglomerate' means a collection of weakly-bound particles or aggregates where the resulting overall surface area is similar to the sum of the surface areas of the individual components, and 'aggregate' means a particle comprising of strongly bound or fused particles, for which the total surface area is smaller than the sum of the surface areas of the individual components. (i.e. only the external surface contributes). In addition, the International Organization for Standardization (ISO, Geneva, Switzerland) has published a series of documents dealing with several aspects of nanotechnology nomenclature, the ISO 80004 series on nanotechnology vocabulary including, for example, ISO/TS 80004-2:2015 (confirmed in 2018, previously ISO/TS 27687:2008) that describes the terms nanoparticle, nanofiber and nanoplate. More detailed and technical information about the definition of an NM is available in the 'questions and answers' section of the European Commission website<sup>3</sup>.

**The EC Recommendation is under revision and has not yet been applied to the definition of a nanomaterial under the Cosmetic Regulation (EC) No 1223/2009.**

However, it is advisable to the Applicants to take this Recommendation (and any resulting revision of the definition) into consideration when assessing the safety of the cosmetic ingredients that are comprised of or consist small particles. In situations where a particulate

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<sup>2</sup> According to the definition under Article 2(k) of Cosmetic Regulation, 'nanomaterial' means an insoluble or biopersistent and intentionally manufactured material with one or more external dimensions, or an internal structure, on the scale from 1 to 100 nm.

<sup>3</sup> [http://ec.europa.eu/environment/chemicals/nanotech/faq/questions\\_answers\\_en.htm](http://ec.europa.eu/environment/chemicals/nanotech/faq/questions_answers_en.htm)

material has internal nano-structures, or exists in the form of larger agglomerates or aggregates, the use of volume specific surface area (VSSA) (Kreyling *et al.*, 2010), and/or other parameters, such as electron microscopy images (Scanning Transmission Electron Microscopy (STEM); Transmission Electronic Microscopy (TEM); Scanning Electronic Microscopy (SEM)), can provide further information - e.g. on the size of primary nanoparticles (NPs), structure and coatings. A decision flow scheme has recently been developed by the NanoDefine project ([www.nanodefine.eu](http://www.nanodefine.eu)) to facilitate establishing whether or not a material should be regarded an NM according to the EC recommended criteria for definition, and to identify suitable methods and tools for NM characterisation.

As indicated by SCENIHR (2009), NMs, like other substances, may or may not be harmful. In principle, the risk assessment paradigm including exposure assessment, hazard identification, dose response characterisation, and risk characterisation, routinely used for conventional substances, also applies to NMs. However, because of the nano-scale dimensions, and the potential qualitative and quantitative differences in physicochemical properties, biokinetic behaviour, and toxicological effects, there may be additional or different concerns in regard to the safety of NMs to consumer health. As indicated in this Guidance, the testing and subsequent safety assessment of NM ingredients will therefore require certain additional considerations, and/or adaptation of testing methods in view of the nano-scale features and properties of the NMs. These aspects need to be specifically addressed when NM ingredients are used in a cosmetic product. Especially, the aspects relating to particle nature and nano-dimensions need to be considered throughout safety assessment; i.e. during material characterisation, hazard identification and characterisation, exposure assessment, and safety evaluation. It is therefore important that relevant data and information on the various testing and production stages are provided by the Applicant for each NM intended for use in cosmetic products (see also SCCS 1588/17).

Irrespective of the presence of NM(s), the existing regulations, and the SCCS Notes of Guidance on testing of cosmetic ingredients and their safety evaluation (SCCS/1602/18 or most recent version), must be followed.

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Cosmetic Regulation (EC) No 1223/2009 provides a definition of NM as well as a mechanism for pre-market notification, safety evaluation and labelling of NMs intended for use in cosmetic products. This Guidance is applicable to cosmetic ingredients that fulfil the criteria defining an NM as set out in the Cosmetic Regulation (EC) No 1223/2009, Article 2(1) (k) (or any future revisions). It is also advisable to take into account the Commission Recommendation (2011/696/EU) on the overarching criteria for definition of NM when assessing the safety of a material that is comprised of, or consists small particles. Safety assessment of NMs is carried out using the same principles that are routinely used for conventional substances. However, because of the nano-scale dimensions and the potential differences in physicochemical properties, biokinetic behaviour, and toxicological effects, additional aspects need to be considered in testing and safety assessment of NMs. The data and information provided for an NM must be relevant, of high quality and adequate to allow safety assessment (see also SCCS/1524/13 and SCCS/1588/17).

Irrespective of the presence of NM(s), the existing regulations and the SCCS Notes of Guidance on testing of cosmetic ingredients and their safety evaluation (SCCS/1602/18 or more recent version) must be followed.

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## 2.2 Safety Considerations Relating to Nanomaterials

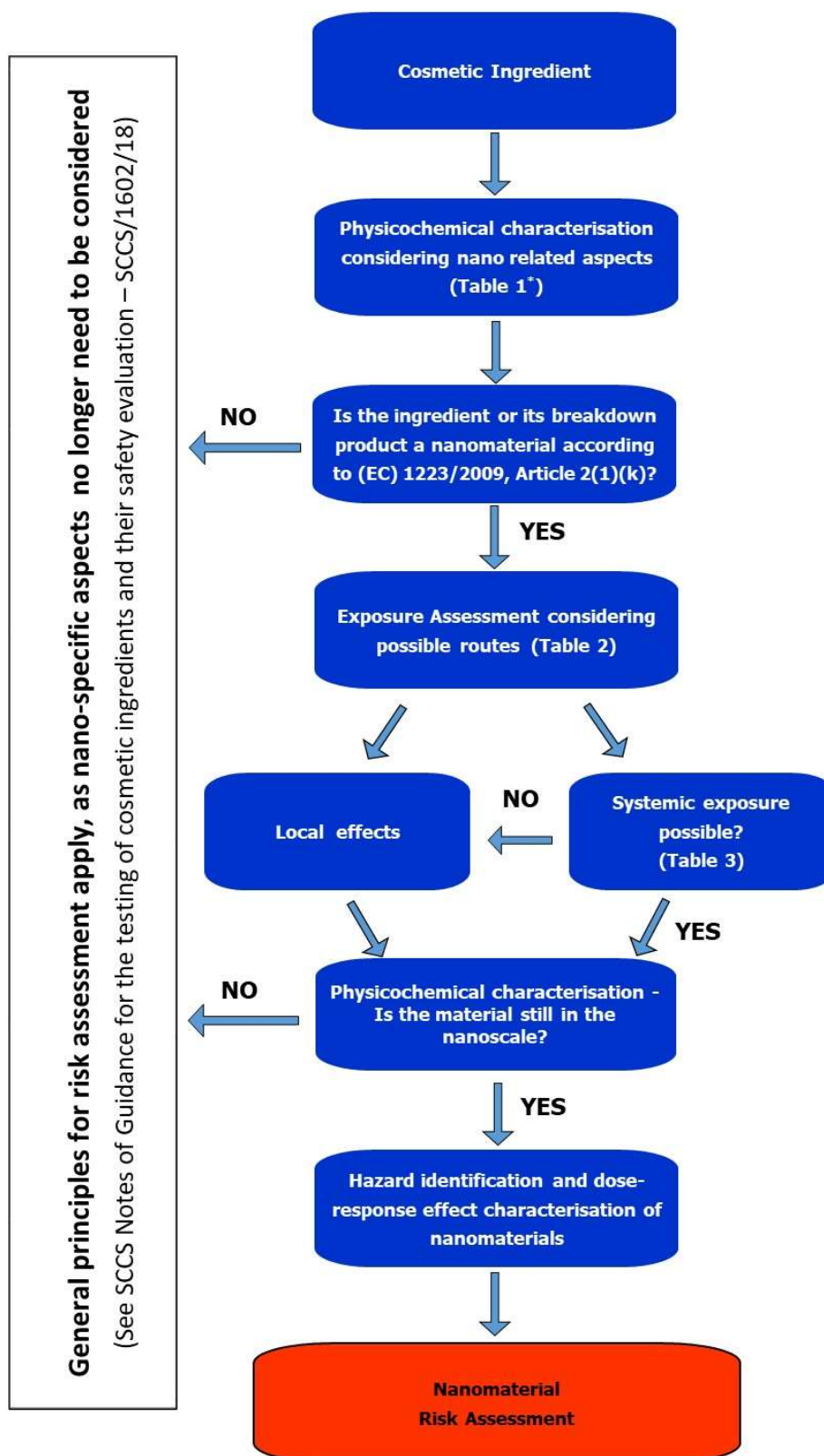
It has emerged from numerous studies that some materials manufactured at the nano-scale show significant deviations in physicochemical properties, interaction with biological systems, and/or toxicological effects, compared to conventional equivalents. For example, nanoparticles (NPs) in the lower nanometre (nm) range may penetrate biological membrane barriers that normally prevent the entry of (larger) particulate materials into cells and tissues (Jani *et al.*, 1990; Geiser and Kreyling 2010; Landsiedel *et al.*, 2012; Treuel *et al.*, 2013; Hougaard *et al.*, 2015; ECHA, 2017b, c; Nakamura and Watano, 2018). It is therefore possible that, once internalised in the form of NPs, some insoluble or poorly-soluble materials may be able to reach those parts of the body that could not have been reached by larger sized particles. As particle size at the nanoscale may be accompanied by certain specific changes in physicochemical properties, a detailed characterisation of the NM intended for use in cosmetic products becomes crucially important. Characterisation is not only important for proper identification of the NM in terms of chemical composition, but also in relation to other particle-related characteristics and properties that need considering in safety assessment (see Section 3 – Physicochemical Characterisation).

The main safety concerns relating to the use of NMs in cosmetics stem from the question whether the use of such products could lead to:

1. local and systemic exposure of the consumer to NPs;
2. local and/or systemic harmful effects; and overall
3. health risk to the consumer as a result of the exposure.

A number of studies and reports investigating possible regulatory gaps have concluded that the current risk assessment paradigm used for conventional bulk materials should also be applicable to NMs (SCENIHR, 2009; OECD, 2009c; Chaudhry *et al.*, 2010; EC, 2012). The current hazard identification/dose-response characterisation, which is based on structured toxicological evaluation of conventional chemicals, should also identify/ characterise toxic effects of NMs, provided that nano-related aspects have been duly considered during testing.

The conventional risk assessment approach for chemicals considers both hazard and exposure – where the absence of one means no risk to the consumer. Thus, safety assessment of NM cosmetic ingredients may, in the first instance, be driven by exposure considerations, with attention to any distinctive material characteristics at the nano-scale (see Figure 1 and Table 2). This will inevitably require detailed characterisation of NMs and determination of the likelihood and extent of systemic exposure resulting from potential translocation of NMs across dermal, respiratory, or gastrointestinal barriers depending on the possible route(s) of exposure (see Section 4). In addition, local effects will need to be considered, irrespective of the fact whether or not the use of a cosmetic product containing NMs can lead to systemic exposure. Even in the absence of systemic availability as an NM, and when no local effects are being observed, it needs to be assessed whether the chemical substance may be translocated and could cause systemic effects. Then, the safety of the NM needs to be assessed according to its chemical nature by following the SCCS Notes of Guidance (SCCS/1602/18 or more recent version). For dermally applied cosmetic products containing NMs, photocatalytic activity must also be evaluated.



\* i.e. in raw material, final formulation and as used for toxicological investigations and exposure assessment;

**Figure 1: Schematic outline for the safety assessment of nanomaterials in cosmetics.**



As mentioned before, due to the nano-scale dimensions, and potentially altered uptake and biokinetics, some NMs may pose a health risk to the consumer because of the ability of insoluble or poorly-soluble NPs to penetrate biological membrane barriers and reach those parts of the body that are otherwise protected from exposure to (larger) particles. Although transport of NMs to secondary organs has been observed, it is still not clear if accumulation of those NMs that are considered low toxic or apparently non-toxic could also lead to a toxicological effect, and/or contribute to a pathological change in organs in the long term (Kermanizadeh *et al.*, 2015). The uptake mechanism of a particular NM can also differ depending on the cell type and the exposure route (dos Santos *et al.*, 2011). At present, there is insufficient understanding of the nature of interaction of NMs with biological moieties that may take place at or close to the molecular level. Keeping this in mind, where there is evidence for systemic availability of NPs, further investigations into hazard identification and dose-response characterisation will be required in consideration of the nano aspects.

For NMs, determination of ADME (Absorption, Distribution, Metabolism, Excretion) parameters should receive special attention. These aspects have historically been determined through *in vivo* studies. However, Cosmetics Regulation (EC) No 1223/2009 has placed a complete ban on *in vivo* testing and marketing for cosmetic products and their ingredients. The generation of *in vivo* data for cosmetic products and ingredients was forbidden in the EU as of September 2004 and March 2009, respectively, with the exception of skin sensitisation, repeated dose toxicity, toxicokinetics and reproductive toxicity (when carried out outside the EU). Subsequently, the generation of *in vivo* data for all endpoints was forbidden as of March 2013. Thus, only data produced before these timelines can be used in support of safety assessment of cosmetics and their ingredients. A key scientific objective of the EU is to promote the development and validation of alternative methods that adhere to the 3Rs principle, and to provide a level of safety equivalent to that obtained through animal testing while using fewer animals, causing less suffering, or avoiding any use of animals. In view of the ban, the need for implementing non-animal alternatives is particularly crucial for safety assessment of cosmetic ingredients/products because safety data can only be drawn from alternative methods, meaning that the 3Rs choices are effectively restricted to 1R (i.e. Replacement of animal testing). In view of this, the SCCS considers all available scientific data, taking into account the testing and marketing bans in force under Regulation (EC) No 1223/2009. This includes physical and chemical properties of the compounds under investigation, *in silico* data such as the results obtained from (Q)SAR {(Quantitative) Structure Activity Relationship} modelling, chemical categories, grouping, read-across, Physiologically Based Pharmacokinetics (PBPK)/Toxicokinetics (PBTK) modelling, *in vitro* and *ex vivo* experimental results. There may, however, be situations where *in vivo* data are available for an NM from studies carried out before the testing bans, or from studies that had been carried out to fulfil data requirements of a different (non-cosmetic) legislation; e.g. for assessment as a medicinal or food ingredient, a pesticide or biocide, or an industrial chemical under REACH (EU, 2008). Such data may be accepted for safety assessment of the NM intended for use as a cosmetic ingredient if the evidence is also provided to indicate that the data had been generated prior to the animal testing bans (i.e. before March 2009 or March 2013 depending on the toxicological endpoint), or for other regulations for non-cosmetic applications of the NM. If such data are available, these should be submitted as part of the safety dossier of a cosmetic ingredient.

Despite some refinement and reduction improvements to the existing *in vivo* test guidelines, and development of guidelines for replacement methods, the available **validated replacement** methods only cover **some** of the toxicological endpoints that are needed for safety assessment. Also, the data/information generated by most alternative methods relate to **hazard identification**. The currently available and validated *in vitro* methods for conventional chemicals concern skin corrosion, skin irritation, skin sensitisation, eye irritation, mutagenicity/genotoxicity and phototoxicity. For reproductive toxicity, 3 validated methods exist (Annex I) but these have not been taken up in the regulatory context because of the lack of specificity. For carcinogenicity, recently validated *in vitro* cell transformation assays (CTAs) are promising tests for predicting NM-induced cell transformation as one of the crucial endpoints of carcinogenicity. Due to a variety of reasons, including the complexity of vertebrate organisms, at present there is no validated *in vitro* method available either for repeated dose toxicity (including reproductive toxicity, developmental toxicity and carcinogenicity), or any proposal currently in place for pre-validation/validation (Worth and Balls, 2002; Rogiers and Pauwels, 2005; Adler *et al.*, 2011; JRC report 2016, 2017, 2018; SCCS 1602/18).

It is also of note that none of the currently available validated alternative methods for conventional chemical substances has so far been validated specifically for NMs. Also, apart from testing dermal absorption, the currently available *in vitro* tests are not suited for dose-response characterisation of possible *in vivo* harmful effects (SCCP 2007; SCCS 2009; Adler *et al.* 2011; JRC report 2016, 2017, 2018). This means that quantitative risk assessment of cosmetic NMs based on alternative methods is challenging at present. However, this situation is not specific to NMs, and equally applies to conventional cosmetic ingredients as well. Notwithstanding such limitations, the use of *in vitro* methods for NMs will require certain additional considerations of the particle nature and other nanoscale aspects, and the testing methods may need certain adaptations or further characterisation and validation. These aspects are discussed in more detail in Section 5.

The ban on animal testing gives another reason that safety assessment of cosmetic NMs may be driven by consideration of exposure scenarios and exposure related aspects (see Figure 1), with a focus on detailed characterisation of the NMs (Table 2), and with nano-related considerations during toxicological evaluations (Section 5 and Annex I). In view of the current lack of alternative methods that have been specifically validated for NMs, the SCCS also considers data obtained from those methods that may not yet have undergone formal validation but can be demonstrated to be scientifically valid.

In regard to toxicological studies, it is important to note that interactions of an NM with biological systems may be different from those expected from conventional forms of the same material. Some of these interactions may bring about further changes in physicochemical characteristics of the NM. A well-known example of the latter is adherence of molecules including proteins to the NM surface, the so-called 'protein corona' (Cedervall *et al.*, 2007; Šimon and Joner, 2008; Lynch and Dawson, 2008; Saptarshi *et al.*, 2013; Capjak *et al.*, 2017; Chen *et al.*, 2017). Therefore, consideration also needs to be given to any changes in the physicochemical properties of NMs during toxicological investigations (see Section 5). The key parameters to consider include nano-scale dimensions (size, morphology, surface area), agglomeration/ aggregation behaviour, surface characteristics of



the particles, etc. (Rocks *et al.*, 2008; SCENIHR, 2009; OECD, 2009c; Chaudhry *et al.*, 2010; Yu *et al.*, 2017, Miceli *et al.*, 2017).

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A schematic outline for the safety assessment of NMs is presented in this section. Detailed physicochemical characterisation of NMs is crucially important in view of the potential changes in material properties at the nanoscale.

The current hazard identification/dose-response characterisation strategies used for conventional chemicals should also be applicable to NMs, provided that nano-related aspects have been duly considered during testing. Safety assessment should consider local and systemic exposure to NPs, local and systemic harmful effects, and health risk to the consumer as a result of the exposure.

In the first instance, safety assessment of NMs may be driven by exposure considerations, with attention to distinctive material characteristics at the nano-scale. Even when there is no systemic absorption of NMs, and/or local effects, safety of the NM as a chemical will need to be assessed according to the SCCS Notes of Guidance (SCCS/1602/18 or most recent version). Where there is evidence for systemic availability of NPs, further investigations into hazard identification and dose-response characterisation will be required in consideration of the nano aspects. For systemically available NMs, determination of ADME parameters should receive special attention.

The Cosmetics Regulation (EC) No 1223/2009 has placed a complete ban on animal testing of cosmetics and marketing of cosmetic ingredients/products that have been tested in animals from March 2013. Thus, toxicological data need to be derived from validated or scientifically-valid alternative means, such as *in vitro* and *ex vivo* methods, *in silico* models, grouping and read-across, physiologically-based pharmacokinetic (PBPK) and toxicokinetic (PBTk) modelling.

Animal data can also be accepted if the testing had been carried out either on a date prior to the animal test ban, or to meet regulatory requirements under a different framework (i.e. not for cosmetics use).

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### 3. PHYSICOCHEMICAL CHARACTERISATION

The properties, behaviour, and biological effects of NMs may be influenced by a number of physicochemical parameters. Detailed data and information on characterisation of NMs therefore forms an integral part of the risk assessment. The characterisation data presented in a safety dossier should provide an unambiguous **identification** of the NM tested. They must also be relevant to the NM that is used in the final cosmetic product. Where the data relate to a different NM, or a different form of the NM than that intended for use in the final product, justification should be given and the scientific basis provided for considering both as 'similar' to allow data read-across between the NMs for safety assessment.

Changes in the manufacturing process may lead to significant differences in the physicochemical and morphological characteristics of different batches of the same NM. They may also introduce new/different impurities and other residual materials. For some materials, fundamentally different production processes are used (e.g. for the production of silica via pyrogenic and precipitation processes) which may define the surface

characteristics and thus particle properties. It is therefore important to provide a description of the manufacturing process (EFSA, 2018).

Due to the potential for significant differences in the physicochemical characteristics of the same pristine NM resulting from variations in the manufacturing process, or when produced by different manufacturers, or due to aging (e.g. agglomeration/ aggregation, sedimentation), it is important that detailed specifications of the NM intended for use in a cosmetic product are provided by the Applicant. The specification should include an acceptable range for each physicochemical parameter in consideration of the batch-to-batch variation, and/or any aging effects. This information will be used by the risk assessors to decide whether or not the batch(es) used in toxicity testing can be considered representative for safety assessment of the NM intended to be used in cosmetic products (EFSA, 2018).

Different formulations can also affect physicochemical properties of NMs. It is therefore also of utmost importance that the physicochemical status of an NM in the final cosmetic product is determined at different stages, as detailed below.

Each NM has a specific (bio)chemical composition of its core and surface, as well as a physical structure of the surface. The behaviour, interaction, fate and effects of an NM are inevitably influenced both by the nano-dimensions (size, morphology, surface area), the nature of the chemical(s) that make up the NM including surface characteristics, and the structural form (crystalline structure). AN NM may pose a hazard to health and/or the environment not only due to inherent chemical composition, but also due to the nano-scale features, including surface composition (e.g. coatings), which may modulate the uptake, biokinetics and toxic effects.

In this regard, it is important to note that any nano-related properties are intrinsically linked to the physical integrity of the nano-structure of an NM. Where an NM loses its nano-structure – e.g. in a formulation, a test medium, or biological surface/environment, due to solubilisation, breakdown or degradation, or interactions with other substances, it will no longer be expected to behave differently from its non-nano equivalent. It may still pose a toxicological hazard at the local level in case the chemical constituents can cause local effects by themselves. Additionally, systemic toxic effects might occur if, before disintegration, the nanostructure had delivered the chemical constituents to a biological site where the conventional form would have not led to a comparable exposure. Determining stability of the NM under experimental conditions is therefore of prime importance for the interpretation of any test results. Stability may be measured in terms of dissociation constants, dissolution rates, and solubility of an NM in the final cosmetic product and in the media/vehicle(s) used in exposure/hazard evaluations using appropriate characterisation methods. In addition, determining the stability of the NM surface is equally important, because certain reactions, such as oxidation/hydroxylation, may take place during handling/storage which may alter the interaction of the NM with biological systems. In this regard, surface characterisation should consider both, surface modification by substances that are strongly bound to the particle surface, or applied as a thin layer of coating that covers the entire surface of a particle and is strongly bound (either chemically or physically) to the surface (EFSA, 2018).

As the physicochemical parameters may change in various environments, it is recommended that, as a minimum, characterisation of NMs intended for use in a cosmetic product should be determined at three stages:

- as manufactured (pristine state) to identify the basic NM,
- after addition to the final cosmetic formulation to identify how consumers are exposed, and
- as used for toxicological investigations.

In the case of application in spray products, it is also necessary to determine the concentration of NM in the spray mist released from the container (see section 4).

When characterisation of an NM is not feasible at any of these stages, e.g. due to the lack of suitable methods or due to degradation of the NM, this should be justified and documented.

It is important to note that environmental impacts of cosmetic ingredients are not considered during safety assessment under the Cosmetic Regulation. They, however, fall under the remit of different regulatory frameworks, such as REACH (EU, 2008).

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Physicochemical characterisation of NMs should provide unambiguous identification of the NM that is used in the final cosmetic product and for which test data have been provided. If these are not the same material, justification should be provided for the scientific basis for considering them 'similar'.

A description of the manufacturing process should be provided, along with data on batch-to-batch variation. Where there is a significant variation between batches produced by one manufacturer, or by different manufacturers, it is important that detailed specifications of the NM intended for use in a cosmetic product are provided by the Applicant with indication of the range for each physicochemical parameter.

Due to potential changes in physicochemical characteristics, the status of an NM in the final cosmetic product should be determined at different stages.

Determination of the stability of the core NM as well as surface moieties is important. It is recommended that, as a minimum, characterisation of NMs intended for use in a cosmetic product should be determined at three stages:

- as manufactured (pristine state) to identify the basic NM,
- after addition to the final cosmetic formulation to identify how consumers are exposed, and
- as used for toxicological investigations.

If characterisation of an NM is not feasible at any of these stages, it should be justified and documented.

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### **3.1 Key physicochemical parameters**

Selection of the key physicochemical parameters that can adequately describe an NM, and the selection of the characterisation methods that can be used to measure them, will depend on the composition, properties, and intended use(s) of the NM. Due to the current knowledge gaps in regard to the relationship(s) between physicochemical properties and

potential adverse health effects of NMs, it is difficult to select a definitive priority list of parameters for characterisation of NMs. This issue has been the subject of discussions by several international expert committees and working groups, the reports of which have been considered in preparation of this Guidance Document. The key reports considered in this regard include those published by the OECD Working Party on Manufactured Nanomaterials (OECD 2009c; 2010a, c), the International Organization for Standardization (ISO 10808:2010), the EU's Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR, 2009), the EU's Scientific Committee on Consumer Products (SCCP, 2007), the European Food Safety Authority (EFSA, 2011, 2018), the ICCR Working Groups (2011), the ECHA guidance on the preparation of registration dossiers that cover nanoforms (ECHA, 2017d), the ECHA Appendix R.6-1 for nanomaterials applicable to the Guidance on QSARs and Grouping of Chemicals (ECHA, 2017a), a publication by DeLoid *et al.* (2017) and a recent publication by Mourdikoudis *et al.* (2018). The physicochemical parameters identified as important by these expert reports for safety assessment of NMs have been summarised in Table 2.

In some instances, not all of the parameters listed in Table 2 will be relevant for a given material as these are determined on the basis of composition, function, purpose and/or intended use. In such cases, justification should be provided for the characteristics that are not determined or provided, or to explain why they were not deemed applicable for a given NM (EFSA, 2018). In the case of NMs exhibiting various crystallographic phases (e.g. anatase/rutile TiO<sub>2</sub>, amorphous/crystalline SiO<sub>2</sub>), selected area electronic diffraction (SAED) studies can provide clear information on the identified structures of the compound and on the spatial distribution and localisation (typically core/shell, 3D mixture, multilayers) of the various crystallographic phases from dark field electronic images. For NMs present in multi-component composites, the overall material should also be described along with the individual components. In addition, energy dispersing X-ray analysis (EDX chemical analyses) and chemical cartographies coupled to SEM/TEM may provide clear material identification and information on the size distribution and particle localisation. In the case of an NM consisting of a mixture of different types of particles, each component should be described individually according to Table 2 and the ratio of all components in the mixture provided. The structure of the particles should also be described as exact as possible. This includes information on the distribution of individual components in the particle, e.g. homogeneous mixture, core/shell and coatings.

It should be noted that the non-exhaustive list provided in Table 2 only includes mainstream methods currently available. It can be expected that other new and improved methods will also become available in due course.

**Table 2: Important parameters and methods for identification and characterisation of nanomaterials intended for use in cosmetic products that should be provided**

Parameter	Description	Methods <sup>*)</sup> (non-exhaustive list, see Glossary for abbreviations)
Chemical identity	Information on structural formula(e)/molecular structure(s) of the constituents of NM along with chemical and common names, and CAS and EINECS numbers (where available).	A wide range of analytical methods, including MS, AAS, ICP-MS, FTIR, NMR, Mössbauer spectroscopy, etc.

Chemical composition	Information on full chemical composition of the NM including purity, nature of impurities, coatings or surface moieties, doping material, encapsulating materials, processing chemicals, dispersing agents, and other additives or formulants e.g. stabilisers.	A wide range of analytical methods, including UV-Vis, HPLC, GC/LC-MS, AAS, ICP-MS, FTIR, NMR, XRD, Mössbauer spectroscopy etc.
Production process particles	The entire processes used for production/ modification of the NM since they can have a significant effect on the properties of the NM, e.g. pyrogenic or precipitated silica, sulfate, chloride or argex process for TiO <sub>2</sub> .	
Particle size and size distribution including presence of agglomeration or aggregation state	Information and data (mean and median size [nm] as well as graphical diagrams of size distribution) on primary and secondary (agglomerates and aggregates) particle size, particle number size distribution and particle mass size distribution. Material specifications and any batch to batch variation during manufacturing. The use of more than one method (one being electron microscopy-based imaging) for determination of size parameters has been recommended by EFSA 2011; OECD (2010a, b); SCCS 2012; SCENIHR 2015; EFSA (2011, 2018). Information on the characterisation techniques used. Data both on median particle size (50%) and mean particle size ( $\pm$ SD in nm), as well as size distribution in terms of relative number versus size as well as number weighted sum function (cumulative numbers).	FFF, HDC, HPLC, Analytical ultracentrifugation, CLS disc centrifugation, TEM, SEM, AFM, DLS, DMA, PTA/NTA
Morphology /Shape	Information on the physical form and shape (particle-, tube-, rod- or fibre shape, porosity). Aggregation/agglomeration state (primary particulates or agglomerates/aggregates). Information on the NM preparation (powder, solution, suspension or dispersion). Aspect ratio (for fibre/tube like materials), specially for biopersistent materials with aspect ratio > 3 Appropriate EM images to support the description.	AFM, TEM, SEM, NMR, XRD
Structure	Description of the structure, including 1D, 2D and or 3D spatial distribution of the components (e.g. homogeneous mixture, core-shell, surface coating) (EFSA, 2018). High quality electron microscopy images of non-homogeneous particles.	TEM, SEM, AFM
Crystallographic structure	Description of crystalline form (amorphous, polycrystalline, crystalline including specification of phase and	XRD, TEM

	volumic fraction as well as spatial distribution).	
Surface area	Information on BET specific surface area of the NM, and volume specific surface area (VSSA) (see Kreyling <i>et al.</i> , 2010 for calculation of VSSA). At the moment the VSSA is applicable only if the NMs are in powder formulation. Ideally, density of NMs should be used for calculation of VSSA, rather than density of bulk material.	BET
Surface characteristics	Detailed information on NM surface, e.g. the components bound to the surface, presence of any functional groups (e.g. carboxy, amino, hydroxy). Information on surface charge (zeta potential), morphology/topography, interfacial tension, reactive sites, as well as any chemical/ biochemical modifications or coatings that could change the surface reactivity, or add a new functionality. Information on any surface contamination.	LDE, SPM, XPS, MS, RS, FTIR, NMR, analytical ultracentrifugation (for surface composition), GE, SPM, LDE, Phase Analysis Light Scattering (for zeta potential), Nano SIMS, SERS, and Mössbauer spectroscopy.
Solubility	Information on solubility of the NM in relevant solvents and partitioning between aqueous and organic phases (e.g. log $K_{ow}$ for organic NMs, and surface modified inorganic NMs). Dissolution rates in relevant solvent(s) for soluble and partially-soluble NMs (solubility should not be confused with dispersibility of insoluble NMs). For slowly dissolving NMs: data on dissolution rate and the conditions under which the measurements were made. Information on hygroscopicity of powders.	Solubility/ dissolution rate in water and other relevant solvents.
Dispersibility	For insoluble dispersible NMs: information on dispersibility in terms of a relative amount of the particles that can be dispersed in a suspending medium (including information on stability of the dispersion in the given media and the conditions applied (EFSA, 2018)).	
Catalytic activity	Information on the chemical reactivity of the NM core material or surface coating. Information on photocatalytic activity and radical formation potential of relevant materials.	Kinetic measurements of chemical, biochemical and/or catalysed reactions
Concentration	Information on concentration in terms of particle mass and particle number size distribution per volume for dispersions, and per mass for dry powders.	A wide range of analytical methods, including UV-Vis, HPLC, GC/LC-MS, AAS, ICP-MS, etc.
Dustiness	Information on dustiness of dry powder materials.	Methods described in EN 15051:2006.
Density and pour density	Information on density/porosity of granular materials and pour density.	Methods described in ISO 697:1981, EN ISO 60:1977
Redox potential	Information on oxidation state and redox potential (for inorganic materials)	Potentiometric methods, X-ray absorption spectroscopy.

	including the conditions under which redox potential was measured	
pH	pH of aqueous suspension.	pH in aqueous media
Viscosity	Information on viscosity of liquid dispersions.	Methods described in OECD TG 114
Stability	Data on physical and chemical stability/ dissociation constant of the NM and coatings (if applicable) in relevant formulation/ media.	MS, HPLC, DLS, FTIR, NMR
Other aspects	UV absorption (extinction coefficient), light reflection.	UV-Vis

\*) All abbreviations of the methods are explained in the glossary.

As mentioned before, a thorough physicochemical characterisation of NMs is critical for supporting the safety assessment, and needs to be carried out at different stages (see above).

In general, characterisation of an NM in a cosmetic formulation can be more challenging than in a raw material, and even more so when the NM is contained in a biological matrix. Depending on the concentration of an NM contained in a formulation/ matrix, and the nature of the formulation/ matrix, a suitable characterisation scheme should be developed to include appropriate methods for isolation, purification and concentration (if necessary) before analysis of the NM. Characterisation of an NM in a cosmetic product should also provide information on any changes in the NM characteristics during formulation, e.g. in terms of primary/ secondary particle sizes (e.g. occurrence of agglomeration/aggregation of the nanoparticles), chemical composition, structural state, surface characteristics, etc. These parameters should also be considered when evaluating stability and shelf life of the NM ingredient in a final product. Similar considerations are needed during toxicological evaluations.

Parameters such as size, aggregation states, crystallographic state, surface charge, coatings and other properties may change in different solvents, test media, and biological environments. Therefore, conditions under which measurements are made should be given a careful consideration, and documented at each stage of production and while the material is on the shelf, and should be detailed in the dossier.

As the sample preparation step for electron microscopy is known to influence the physicochemical characteristics of NMs (Taurozzi, 2012a), information on the protocol used to prepare sample should be provided, in particular in case of the use of ultrasonic dispersion (Retamal *et al.*, 2017; Taurozzi 2011, 2012a, 2012b).

Where needed, the SCCS may ask for the provision of a detailed description of the production processes, any surface modifications, and the preparatory steps carried out for integrating the NMs in the final cosmetic products as input into the safety assessment process.

### 3.2 Methods for Characterisation

A wide range of analytical methods is available for measuring the physicochemical parameters of conventional chemical substances. Some of these methods can also be used (or adapted) for detection and characterisation of NMs. The most relevant methods for NM



characterisation are based on light scattering (e.g. DLS), electron microscopy (e.g. TEM, SEM), size separation and extraction (e.g. (ultra) centrifugation, Field Flow Fractionation (FFF), Hydrodynamic Chromatography (HDC)), and chemical analysis/detection by spectroscopic or mass spectrometric techniques (e.g. ICP-MS, UV spectroscopy, AAS), surface area determination (BET), and their different variants and combinations. Methods for *in situ* imaging of NMs, e.g. magnetic particle imaging (MPI) and positron emission tomography (PET), are currently under development. Similarly, antibody, binding protein, and enzyme based methods are also under development for organic or coated-inorganic NMs. Mainstream methods for characterisation that may be used for NMs are listed in Table 2, and additional details have been provided in the ICCR report (2011) and other documents (OECD, 2012a, 2014a; ECHA, 2017b; ISO 10993-22:2017; EFSA, 2018).

A particular challenge in regard to characterisation of NMs is the fact that different analytical methods may yield different measurement values, e.g. particle size, because they may be based on different principles for measurement of the same aspect (Domingos *et al.*, 2009). Characterisation of NMs in complex matrices poses a further challenge. Preference should therefore be given to the use of standardised analytical methods. However, it is also important to note that currently there is no single method that can be regarded a 'gold' standard for characterisation of different physicochemical parameters of NMs as such, nor is there one suited method to fully assess an NM in a cosmetic product. The exact choice of analytical method(s) to measure a parameter will be dependent on the chemical composition and the physical form of individual NMs. However, as pointed out in the recent EFSA Guidance (2018), a carefully chosen portfolio of established analytical techniques should provide adequate data for the purpose, provided that measurements are carried out properly, and results are backed up by appropriate documentation.

Any analytical method used for physicochemical characterisation of NMs should be fit for purpose and reliable. Ideally, the method should have undergone validation in terms of performance parameters (e.g. specificity; selectivity; robustness/ruggedness; recovery/trueness; repeatability, and reproducibility), and provide detection/quantification limits and measurement uncertainties. Guidance for the validation of methods for the detection and quantification of engineered NMs in food has been published by Linsinger *et al.* (2013). These principles should also be applicable to other matrices.

In this regard, Electron Microscopy (EM) techniques provide a very useful visual means for the determination of the particle shape and size of NMs. EM can also be linked with spectroscopic or spectrometric methods to provide more information on both particle size/shape as well as chemical composition of NMs. The EFSA Guidance (2018), OECD (2010b) and SCCS 1484/12 (SCCS, 2012) have recommended that the determination of NM size parameters should include the use of an EM method. The SCCS also recommends that size parameters for nano-scale ingredients intended for use in cosmetic products should be measured by at least two methods, one being EM (preferably high resolution TEM).

Different aspects including measurement uncertainties relating to TEM, calibration, use of appropriate standards are described by Boyd *et al.*, 2011; Rice *et al.*, 2013 and De Temmerman *et al.*, 2014.

For size measurements, including electron microscopy, several reference materials are available, e.g. gold nanoparticles developed by the US National Institute of Standards and



Technology (NIST) (<https://www.nist.gov/programs-projects/chemical-characterization-nanoparticles>) as well as certified reference nanomaterials developed or representative industrial nanomaterials characterised by the European JRC (<https://crm.jrc.ec.europa.eu>, <https://ec.europa.eu/jrc/en/scientific-tool/jrc-nanomaterials-repository>), respectively.

The representativeness and reliability of the particle size measurements by EM also needs to be seen in conjunction with other methods as the EM results may be influenced by a number of factors. In particular, sample preparation and handling play an important role in the reproducibility of the analytical results. Dudkiewicz *et al.* (2015a) have shown that the number of particles measured constitutes only a minor source of uncertainty in the size measurement of NMs in food using EM, compared to the combined contribution of the uncertainties relating to sampling, sample preparation, and image analysis.

### 3.3 Performance of Characterisation Methods

With regard to characterisation of NMs, it is important to note that different measurement techniques may yield slightly different results. This is due to the different characteristics of the measurements of the very small dimensions, and/or the low amount of material evaluated in general. Furthermore, these differences may reflect the differences in the aggregation/ agglomeration behaviour of NPs during different sample handling/ preparation procedures, dilutions, or dispersions used in different methods, and/or the different measurement principles applied in individual methods (Domingos *et al.*, 2009). A study by Dudkiewicz *et al.* (2015a) has identified that sampling, sample preparation, and image analysis are the main sources of uncertainty in the analytical results from the measurement of NP size by EM methods. Dudkiewicz *et al.* (2015b) have proposed a uniform measurement expression of a mass equivalent diameter (MED) for cross method comparison of NP aggregate size distributions. The use of such approaches can bring uniformity and standardisation between results from different analytical methods. This inevitably requires the use of standardised protocols for sample handling and preparation. Dispersion protocols for various NMs have been developed by Masuda and Gotoh (1999); Hartmann *et al.* (2015); Mast and De Temmerman (2016); NIST (NIST Special Publication 1200-1 to 1200-5); OECD ([www.oecd.org/science/nanosafety/](http://www.oecd.org/science/nanosafety/)); JRC (<https://ec.europa.eu/jrc/en/scientific-tool/jrc-nanomaterials-repository>); NanoGenoTox ([www.nanogenotox.eu](http://www.nanogenotox.eu)); NanoDefine ([www.nanodefine.eu](http://www.nanodefine.eu)); NANoREG ([www.nanoreg.eu](http://www.nanoreg.eu)). It is therefore important to ensure that sample preparation is carried out in a consistent manner to obtain reproducible results, and to allow a comparison between the results of different samples analysed by a specific analytical method, or by different methods.

In line with the EFSA Guidance (2018), method performance parameters to be determined and documented should include criteria such as specificity, selectivity, recovery, repeatability, reproducibility, and limits of detection/ quantification. Where possible, existing guidelines (e.g. of the International Union of Pure and Applied Chemistry (IUPAC), 2002) should be taken into account, or adapted from guidelines available for that specific material or product category if no specific guideline is applicable for an NM. The use of a method that differs from internationally agreed protocols should be justified and documented.

Reference materials are essentially needed to validate the performance of analytical methods. At present, only a few certified reference materials are available that have been developed for size or surface area parameters ([www.nano-refmat.bam.de/en/](http://www.nano-refmat.bam.de/en/)). The

European Commission's Joint Research Centre has made available a repository of 25 representative NMs for safety testing (<https://ec.europa.eu/jrc/en/scientific-tool/jrc-nanomaterials-repository>). These NMs are useful as standards that can help comparing different studies, and have been used by different EU-funded projects (e.g. MARINA, NANoREG) and the OECD WPMN (Totaro *et al.*, 2016). In the absence of a certified reference NM, a self-generated and properly characterised and documented test material may also be used, provided that the ISO technical specification for preparation of reference NMs has been taken into consideration (ISO/TS 16195, 2013).

### **3.4 Characterisation of NM for toxicological testing and in biological fluids and tissues**

For the toxicological assessment of NMs, it is essential to know in which form the NMs are presented to the test systems. In addition, characterisation of the NMs in the test system is relevant to determine the effect of the test medium/ formulation (and its constituents) on the characteristics and properties of the NM, to determine the validity of the toxicity test outcomes, and to allow for comparison with the NM in the cosmetic product to which exposure takes place. ISO/TR 13014 (2012) lists the key properties for engineered NMs to be characterised in the context of toxicological testing. The methodologies to be used are indicated in Table 2.

When performing *in vitro* toxicity studies, it is necessary to characterise NMs directly in the same testing medium. It is advised to use more than one method; some of these methods are described in SOPs developed within FP7 project NANoREG: (<https://www.rivm.nl/en/about-rivm/mission-and-strategy/international-affairs/international-projects/nanoreg/work-package//wp-2-synthesis-supplying-and-characterization>; <https://www.rivm.nl/en/documenten/nanoreg-d2-08-dr-protocols-for-exposure-fate-characterization-in-ecotoxicity-and-in>).

The current available information indicates that special consideration is needed to address the potential batch-to-batch variations and aging effects (e.g. agglomeration/aggregation, sedimentation, degradation, slow dissolution).

There may be particular difficulties in measuring the amounts of NM in biological fluids and in establishing the form in which NM are present in the body. NM surface transformations (e.g. the dynamics of adherence of proteins and other biomolecules) can have a profound effect on the absorption, distribution, metabolism and excretion (ADME). For determination of NMs in biological fluids/biological systems it is essential that measuring systems are available for detection of the NM and its elemental composition in biological samples. The available methodologies are indicated in Table 2.

### **3.5 Dose Metrics**

The metrics used for toxicological assessments are normally measured and expressed in weight or volume units (such as mg/Kg, or mg/L) for conventional chemicals. Also for NMs weight or volume units are commonly used. However, such metrics may not be appropriate for NMs because of the large surface areas per particle mass or volume. Until suitable parameters are identified, that can describe and predict dose-effect relationships, it is important that tests on NMs are evaluated using different dose-describing metrics, such as

weight/volume concentration, particle number concentration, surface area etc. Therefore, the characterisation data on an NM should provide sufficient information to convert doses based on mass into other parameters such as number of particles or surface area. These data for dose conversion should be available as in practice also for NMs the preparation of the exposure dose will be based on mass (e.g. mg or µg/mL).

In regard to *in vitro* testing using cell cultures, the exposure concentration should also be expressed in relation to the area [µg/cm<sup>2</sup>], and if possible per cell [µg/cell]. Additionally, exposure concentrations can be expressed as number of NPs per ml [NPs/ml], per cm<sup>2</sup> [NPs/cm<sup>2</sup>] or per cell [NPs/cell] as well as surface area of NPs per ml [NP cm<sup>2</sup>/ml], per cm<sup>2</sup> [NP cm<sup>2</sup>/cm<sup>2</sup>] or per cell [NP cm<sup>2</sup>/cell]. The use of the dose description as exposure concentration per cell has been regarded as particularly appropriate for NP testing (Huk *et al.*, 2015).

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Thorough physicochemical characterisation of NMs is critical for safety assessment. A list of important physicochemical parameters is provided in this section, and those relevant for a given NM should be measured. These include chemical identity, chemical composition, production process parameters, number based particle size and size distribution including presence of agglomeration or aggregation state, morphology/shape, structure, crystallographic structure, surface area, surface characteristics, solubility, dispersibility, catalytic activity, concentration, dustiness, density and pour density, redox potential, pH, viscosity, stability, and other aspects such as light absorption/reflection.

Some parameters such as size, aggregation states, crystal structure, surface charge, coatings and other properties may change in different solvents, test media, and biological environments. Therefore, conditions under which measurements are made should be given a careful consideration, and documented at each stage of production and when the material is on the shelf, and details should be provided in the dossier.

A wide range of analytical methods is available for measuring the physicochemical parameters of conventional chemical substances. Some of these methods can also be used (or adapted) for detection and characterisation of NMs. The most relevant methods for NM characterisation have been listed in this section. However, the exact choice of analytical method(s) to measure a parameter will be dependent on chemical composition and physical form of the individual NM.

Sample preparation is known to influence physicochemical characteristics of NMs. Therefore, information on the protocol used for preparing the samples for analysis should be provided.

Measurement of physicochemical characteristics of NMs is compounded by the fact that different analytical methods may yield different results, and characterisation in complex matrices poses a further challenge.

The analytical methods used for physicochemical characterisation of NMs should be fit for purpose and reliable. Ideally, the methods should have undergone validation in terms of performance parameters (e.g. specificity, selectivity, robustness/ruggedness, recovery/trueness, repeatability and reproducibility) and provide detection/quantification limits and measurement uncertainties. Although none of the available analytical methods is currently validated for NMs, a careful choice of established techniques should provide adequate data for the purpose, provided that measurements are properly carried out and documented.

EM techniques provide a very useful visual means for the determination of the particle

shape and size of NMs, as well as chemical composition when linked with spectroscopic or spectrometric methods. It is therefore recommended that size parameters for nano-scale ingredients intended for use in cosmetic products should be measured by at least two methods, one being EM (preferably high resolution TEM).

Reference NMs or standardised test materials should be used to validate the performance of analytical methods.

ISO/TR 13014 (2012) lists the key properties for engineered NMs to be characterised in the context of toxicological testing. For determination of NMs in biological fluids/biological systems, it is essential that a measuring system is able to detect either the NM or its elemental composition in biological samples. Dose metrics used for toxicological assessment of conventional chemicals are normally measured and expressed in weight or volume units. For NMs, it is important to also consider also other dose-describing metrics in addition to weight/volume concentration, such as particle number concentration, surface area etc.

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## 4. EXPOSURE ASSESSMENT

As mentioned before, in view of the animal testing and marketing bans, safety assessment of NM cosmetic ingredients may be driven by exposure considerations in the first place. Prior to commencing the detailed safety assessment of the NM, anticipated exposure scenarios from the proposed uses should be outlined. These exposure scenarios will contribute to decisions on the extent of the hazard characterisation and will be the basis for selecting parameter values for the exposure assessment required for the safety assessment. In particular, determining whether or not any systemic exposure to an NM is possible due to the foreseeable use(s) of a cosmetic product is an important consideration in the safety assessment process. This can for example be determined by analysis of the receptor fluid for NPs in *in vitro* dermal absorption studies. Furthermore, systemic exposure can be assessed based on the concentration levels in organs and/or blood *in vivo*, or by considering other information from toxicological studies, if available (for example from studies on toxicokinetics, acute or repeated dose toxicity, etc.) and in the case of *in vivo* animal studies, when performed before the animal testing ban for cosmetic ingredients or performed in compliance with other regulatory requirements. However, the methods used need to be state of the art, and the limit of detection low enough to demonstrate a potential lack of exposure. In this regard, the use of sensitive methods for chemical analysis (Table 2) should generally be sufficient. For example, the use of imaging methods, such as EM, should be sufficiently sensitive to determine whether or not the absorbed material was present in nanoparticle form in receptor fluids and tissue samples.

It should be noted that even in the absence of systemic translocation of the nanoparticles themselves, degradation products or dissolved fractions of the nanoparticles could be translocated, that then need to be assessed according to their chemical properties by following the SCCS Notes of Guidance (SCCS/1602/18 or its most recent version).

Exposure assessment and the identification of potential exposure routes form the first crucial decision point in the overall safety assessment (Figure 1). The exposure assessment for ingredients in cosmetic products as described in the SCCS Notes of Guidance is a general approach that applies to NMs as well. The use of cosmetic products that contain NMs is likely to be similar to the use of other products that contain conventional ingredients. If this

is the case, default values in relation to exposure (e.g. used amounts of cosmetic products) as provided in the SCCS Notes of Guidance (SCCS/1602/18 or its most recent version) can be used.

Special attention, however, should be paid to any distinctive material characteristics at the nano-scale (see Figure 1 and Table 2). This will require detailed characterisation of NMs and determination of the likelihood and extent of systemic exposure due to potential translocation of NMs across dermal, respiratory, or gastrointestinal barriers, respectively. This assessment needs to be specific for the respective routes, since the behaviour and structural changes and metabolic transformations of the NMs may be different for the different routes of exposure. In addition, local effects will need to be considered, irrespective of whether or not the use of a cosmetic product containing NMs can lead to systemic exposure.

Where there is evidence for systemic absorption, further investigations will be required to confirm whether the absorbed material was in a nanoparticle form or in solubilised/ionic/metabolised form. Where the absorption of NPs cannot be ruled out either by experimental measurements, or justified on the basis of solubility/degradation of the NM, the SCCS will apply a default approach and assume that 100% of the absorbed material was in nanoparticle form.

#### **4.1. Functions and uses of cosmetic ingredient**

NMs as cosmetic ingredients may serve various functions, e.g. as UV-filters (such as Titanium dioxide or Zinc oxide), as pigments (e.g. Carbon black), or as antimicrobial agents.

For substances that are evaluated as cosmetic ingredients, the concentration, function and way of achieving that function in marketed cosmetic products should be reported. In particular, if substances are meant to be included in sprays or aerosols, this should be explicitly mentioned since consumer exposure via inhalation is then probable and needs to be taken into consideration in the overall safety assessment.

In addition, other uses of the substance (e.g. in consumer products, industrial products) and, wherever possible, the concentrations involved in such uses should be described.

#### **4.2. Identification of relevant exposure scenarios**

In order to assess exposure of the general population, relevant exposure scenarios have to be identified that comprise all the important functions and uses of a cosmetic ingredient as detailed in section 4.1. These scenarios need to describe 'reasonably foreseeable exposure conditions' under which the cosmetic products should be safe (Cosmetics Regulation (EC) No 1223/2009, Article 16f).

The SCCS Notes of Guidance (SCCS/1602/18) include a non-exhaustive list of parameters that are needed to construct an exposure scenario. For NMs, in addition to the weight-based concentration of the NM, the concentration should also be given in terms of particle number concentration and surface area. Also, changes in the aggregation and/or degradation/dissolution status of the NM during exposure should be accounted for.

### 4.3. Calculation of external exposure

NM particle characteristics during consumer use (e.g. in terms of variable particle size distribution) may be different from NM particle characteristics established in experimental settings (e.g. stable particle size-distribution). However, factors such as particle size and size distribution/agglomeration state of NMs are considered to be important in determining the hazard. Therefore, the experimental settings for NMs may need to include a broader range of scenarios than those necessary for non-NMs, in order to allow extrapolation to exposure conditions during consumer use (e.g. different particle sizes).

Information on size distribution in particular is necessary as an input for calculating size-dependent uptake and subsequently internal exposure (see section 4.4). It has been shown that the uptake and subsequent distribution of NPs may depend on the size of the particles (Lankveld *et al.*, 2010; Bachler *et al.*, 2015), so that the respective size distributions of the particles need to be considered.

#### 4.3.1 Dermal exposure

Dermal exposure to NMs can in principle be calculated as outlined in the SCCS Notes of Guidance (SCCS/1602/18). However, since the metric of concern may be particle number, it may be necessary to calculate the exposure based on particle number. Furthermore, since particle uptake depends on the size of the particles, it is necessary to take into account the size distribution of the particles in the cosmetic product to allow calculation of internal exposure from external exposure.

#### 4.3.2 Inhalation exposure

Cosmetic ingredients can enter the human body by inhalation. The inhalable fraction determines lung exposure, and part of this inhalable fraction deposits in the respiratory tract. The exposure or deposition dose may be normalised by an inherent property of the inhaled substance e.g. its particle size, mass, surface area, or other characteristics. After deposition, the biological targets affected by the substance may be in the respiratory tract itself (local exposure of various parts of the lung) or elsewhere in the body either after mucociliary clearance into the GI tract, translocation (absorption) across the alveolar barrier, distribution via lymph or blood circulation (systemic exposure, see chapter 4.4.2.2).

Inhaled and deposited particles are continually cleared from the respiratory tract. Inhaled insoluble particles are cleared from the human lung by two different mechanisms, mucociliary clearance and phagocytosis clearance. In addition, free particles may translocate out of the alveolar region of the lung into the lymphatic system or the lung interstitium. Depending on their lipophilicity, hydrophilicity, and/or size, soluble particles may be dissolved prior to physical clearance. It has been observed from animal studies in rats that when NMs are present in high amounts and accumulate in the alveoli, they cannot be cleared anymore by macrophages due to an excessive presence of the particles, denominated as 'lung overload'. Therefore, chronic irritation, chronic inflammation and, cytokine releases, may occur, leading to local toxic effects. For example, the carcinogenic hazard of TiO<sub>2</sub> nano (and also for other particulates) has been observed in rats when dust is inhaled in quantities leading to reduction of normal particle clearance mechanisms in the lung (see overview in ECHA, 2017b). The relevance of the "lung overload" as observed in



the rat model for human risk assessment (e.g. lung carcinogenicity) is not yet established and scientifically under debate.

Particle size determines inhalation exposure, since only particles and droplets smaller than 10 µm can enter the lung via inhalation. Particle deposition in the lung depends on particle size, density, and hygroscopicity (ability of a substance to attract and hold water molecules from the surrounding environment), and is influenced by the local anatomy and airflow as reviewed by Braakhuis *et al.*, 2014. They report that NMs with diameters in the range of 10-100 nm enter preferentially the alveolar areas. For particles in the mentioned diameter range (10 – 100 nm), the deposition of NMs is mainly governed by diffusion of the NMs in the inhaled air (Brownian motion) and the density is less relevant. For particles (or agglomerates) larger than 100 nm diffusion is less likely and also the density increasingly determines the site and extent of deposition.

Similarly, size-distribution is essential for the calculation of internal exposure via inhalation (see Section 4.4.2.2). Probably, also particle shape contributes to the rate of deposition of particles in the respiratory tract. Based on size, the British-Adopted European Standard BS EN 481 (1993) distinguishes three different fractions of particles that deposit in different regions of the lung: the inhalable, thoracic and alveolar fraction. NPs fall into an even smaller-sized category within the respirable fraction, which is referred to as ultrafine particles (PM<sub>0.1</sub>), i.e. with an aerodynamic diameter  $d_{ae}$  of  $\leq 0.1$  µm (British Standards Institution, 1993).

Inhalation exposure is relevant for products meant to be applied in spray form (SCCS/1539/14) and for exposure to volatile cosmetic ingredients used in dermally applied products. It can be assessed either by using exposure models or by experiments.

One of the modelling tools available to assess inhalation exposure to NMs is the ConsExpo nano tool (<https://www.consexponano.nl>). ConsExpo nano is based on the module for spray products in the ConsExpo tool (Delmaar and Bremmer, 2009), which was originally developed for estimating exposure to solved substances in spray products. This ConsExpo module was adapted for estimating exposure to NMs and may also be used for other products that contain particles, e.g. powder products. The central metric in ConsExpo nano is the alveolar load. This is based on the finding that the most relevant effect after inhalation exposure to NMs is the induction of inflammation in the alveoli (Braakhuis *et al.*, 2014). The most critical determinants of this effect are both the magnitude and the duration of the alveolar load caused by an NM. In order to estimate the alveolar load arising from the use of NM-containing spray products, ConsExpo nano combines models that estimate the external aerosol concentration in indoor air with models that estimate the deposition in and clearance of inhaled aerosol from the alveolar region. ConsExpo nano provides the mass-based inhalation exposure, and also alternative dose metrics such as total number or total surface area of the NPs inhaled because of the ongoing debate regarding the most appropriate dose metric for NP exposure (Braakhuis *et al.*, 2015; Duffin *et al.*, 2007; Sayes *et al.*, 2010; Schmid *et al.*, 2009).

Another possibility to assess external exposure from spray applications of products containing NMs is to measure the particle size-distribution in the aerosol leaving the spraying can. On this basis, a size-specific exposure calculation can be performed. In such a study, careful characterisation is needed of the droplet size and the NM distribution in the

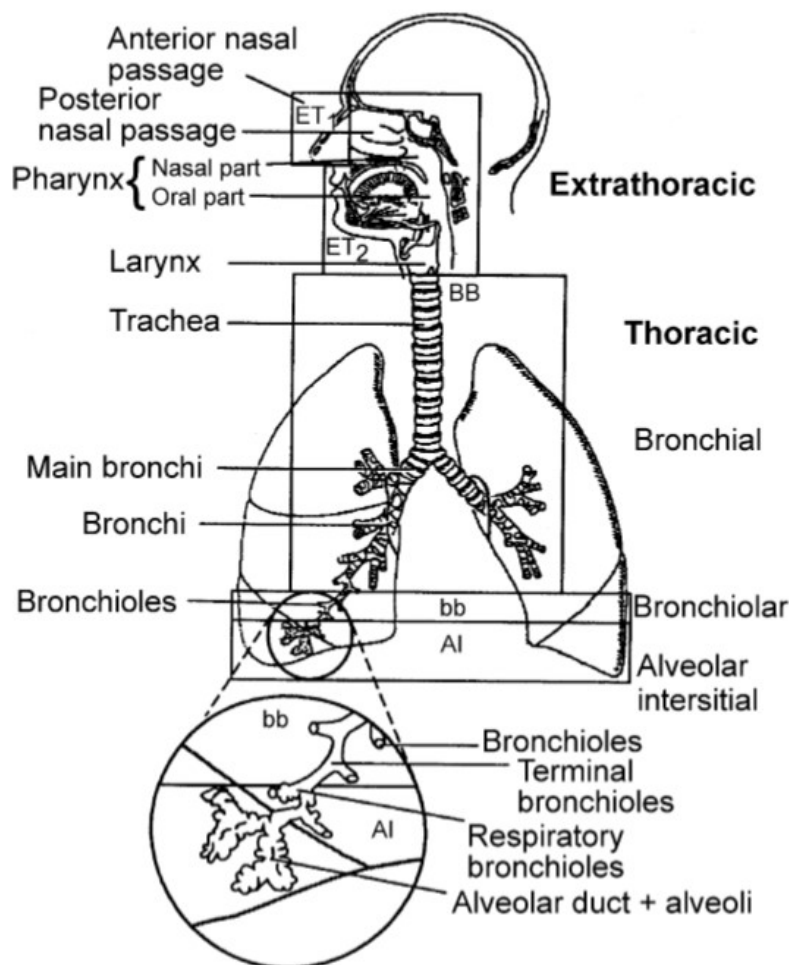
droplets (Lorenz *et al.*, 2011). Determination of the generated droplet size distribution alone is not sufficient, and needs to be complemented with the size distribution of the dried residual aerosol particles. Furthermore, the test sprays have to be chosen so that they cover the worst-case aerosol generation (i.e. normally the distribution with the largest fraction of very small droplets). For this, it has to be taken into account that spray cans, spray nozzles and spray formulations influence the droplet size distribution of the generated aerosols, and as a consequence, the resulting particle size distribution available for inhalation.

When the droplet size distribution in the spray mist is small enough to reach the lung, the deposition of nanoparticles needs to be calculated. Different models are available to estimate the total and regional lung deposition of aerosol and/or particles. Examples include the Human Respiratory Tract Model (HRTM) (International Commission on Radiological Protection - ICRP, 1994, 2002a, b), the NCRP model (National Council on Radiation Protection and Measurement), the IDEAL model (Inhalation, Deposition and Exhalation of Aerosols in/from the Lung) or the MPPD model (Multiple-Path Particle Dosimetry). For a more detailed description of these models, see section 4.4.2.2.

Most widely used among these models are the HRTM (ICRP 1994, 2002a, b) and the MPPD model (Asgharian *et al.*, 1995; Asgharian *et al.*, 2001; Cassee *et al.*, 2002). The HRTM model is a semi-empirical model based on experimental data for regional particle deposition in humans under well-controlled conditions (see chapter 4.4.2.2). It has been used for example for NPs in sprays by Lorenz *et al.* (2011), who calculated specific external exposures for each region of the respiratory tract based on the particle size distributions of spray mist. Other investigators have developed similar and more user-friendly dosimetry software, e.g., the MPPD model.

The HRTM was developed by the ICRP and can be used for the estimation of deposited doses of inhaled particles in the respiratory tract. It is a semi-empirical model based on experimental data for regional particle deposition in humans under well-controlled conditions. In the model the respiratory tract is divided into two compartments: the extrathoracic (ET) and the thoracic (TH) airways. The TH regions are bronchial (BB: trachea, bronchi), bronchiolar (bb), the alveolar interstitial region (AI) (i.e. gas exchange region, airway generations), and the thoracic lymph nodes. The ET regions are the anterior nasal passage (ET1); the posterior nasal passage, pharynx, and larynx (ET2); and the extrathoracic lymph nodes (see figure 2).





**Figure 2: Respiratory tract regions defined in the HRTM.**

*ET1: extrathoracic region including the anterior nasal passage; ET2: extrathoracic region including posterior nasal passage, pharynx and larynx; BB: bronchial region; bb: bronchiolar region; AI: alveolar interstitial region. Figure taken from ICRP Publication 89 (Fig. 5.1, page 88, 2002a).*

The model evaluates fractional deposition of a particle in each region for all particle sizes (0.6 nm–100 μm). For the ET regions, measured deposition efficiencies were related to characteristic parameters of particle size and air flow, and scaled by anatomical dimensions to predict deposition for different anatomical conditions (e.g. age, sex). For the TH airways, a theoretical model of particle deposition was used to calculate particle deposition in each of the BB, bb, and AI regions, and to quantify the effects of the subject's lung size and breathing rate.

The model describes several routes of clearance from the respiratory tract. Some particles deposited in ET1 are removed by extrinsic means such as nose blowing. In other regions, clearance varies between the movement of particles towards the alimentary tract (mucociliary transport) and clearance by the lymphatic system (particle transport to the draining lymph nodes), and the absorption into blood of material from the particles in the

respiratory tract, which depends on the physical and chemical form of the deposited particles. In the HRTM, by default, absorption is assumed to occur at the same rate in all regions of the lung (including the lymph nodes), except ET1 for which it is assumed that no absorption takes place. The default values can be changed for a specific assessment.

Another deposition model is the MPPD model. This deterministic model calculates the deposition fraction in humans averaged over the entire lung compartment. In contrast to the ICRP model, it allows the selection of different particle size ranges and exposure conditions, and allows choosing the exposed species among rats, rhesus monkeys, mice, pigs, sheep and humans. This allows simulations of particle deposition for a variety of inhalation scenarios and to take e.g. into account the age of the subjects that are exposed to aerosols.

The mass median aerodynamic diameter (MMAD) and geometric standard deviation (GSD) determine the site of deposition in the respiratory system. Large particles or droplets deposit by impaction in the upper respiratory tree of the lung (oropharyngeal and tracheo-bronchial region), where the air velocity is high and the airflow is turbulent. Particles in the size range of 0.5–5  $\mu\text{m}$  deposit by sedimentation in the terminal bronchioli and alveolar regions. The larger the GSD, the more sites the aerosol will be deposited in the respiratory tract. NPs may reach the alveolar space and deposit in the alveoli, but will also be partly exhaled as they remain dispersed in the inhaled air.

### 4.3.3 Oral exposure

Oral exposure is relevant for product categories like toothpaste, mouthwash or lipstick, since these may be inadvertently ingested. In principle, for calculating oral exposure the same procedure is followed for NMs as for other cosmetic ingredients. The difference in this case is that the size and agglomeration status of NPs can change due to the low pH in the stomach and the high ionic strength in the whole gastrointestinal tract. NMs may even lose their nano-specific properties, e.g. due to breakdown or dissolution. For such NMs, the properties and effects are more likely to be similar to those of the corresponding ions (Oberdörster, 2000; Utembe *et al.*, 2015) so that nano aspects do not need to be considered further once the particles lose their nano-character. According to EFSA (2018), the characteristics that may indicate a loss of nano-specific properties, and thus reduce the chance of exposure to the NM, include: high degradation rate in water, in the food matrix or in gastrointestinal fluids; (bio)degradability to non-nanosized products; formation of larger aggregates (>100 nm); NPs being fixed or embedded in other matrices (e.g. polymer composites used as food contact materials).

It is therefore advised to test first whether the NM or nanosized degradation products remain present as particles under conditions of the gastrointestinal tract. This can be tested e.g. through a simulated *in vitro* digestion test (EFSA, 2018). Also, information on general biodegradability in other simulated body fluids, such as under lysosomal conditions, may give an indication whether the NM will be stable under the conditions in the gastrointestinal tract (Utembe *et al.*, 2015) so that it may be taken up and potentially accumulate in the body.

Due to the likely oral exposure to (very) small amounts of NMs, local effects in the gastrointestinal tract are most likely to be limited under realistic conditions. However, there

may be exceptions, such as the reported association between TiO<sub>2</sub>-NP exposure and colitis (Bouwmeester *et al.*, 2018 and references cited therein). For the mass-based calculation of systemic exposure from 'external' gastrointestinal exposure in the absence of information on biodegradation, it should be assumed that all NM is available for uptake in the same form as initially added to the product.

#### **4.4. Calculation of systemic exposure**

##### **4.4.1 General aspects of toxicokinetics of nanomaterials**

The ability of NPs (especially in the lower nm range) to penetrate cellular membrane barriers has added another dimension to the toxicology of particulate materials. Due to the very small size, and certain surface characteristics, insoluble or partially-soluble NPs may be able to reach unintended parts of the body that are otherwise protected from exposure to particulate materials by biological membranes. Toxicokinetics of NMs within the entire organism is considered as an important building block of toxicological studies. Small fractions accumulated in secondary organs over short-term exposures may not manifest adverse health effects. However, NM may trigger the production of effect mediators in the primary organ, which are then released into the blood. These mediators may initiate adverse health effects in the cardiovascular system and elsewhere. In addition, during chronic exposure (e.g. via lungs or gut), NM concentrations in secondary organs may accumulate to an extent large enough to trigger adverse health effects (OECD 2016d).

Compared to soluble chemicals, the uptake of NPs may considerably differ between various organs. This is because the uptake and bio-kinetics of NMs is governed by processes that are different from (solubilised) molecules. Transport of particles across biological barriers is, unlike most molecules, not based on diffusion gradient-driven partitioning, but on endocytosis or other active (energy-driven) transcellular transport systems. Particles are removed from the blood circulation by cells of the mononuclear phagocytic system (MPS) and mainly end up in organs rich in phagocytic cells like liver (Kupffer cells) and spleen (macrophages) (e.g. Geraets *et al.*, 2014). Non-degradable particles are not expected to be metabolised, but some may undergo (slow) dissolution (e.g. Ag-NPs), resulting in the gradual formation of ions and smaller particles. When (slow) dissolution occurs, both the toxicokinetics of the dissolved particle present as soluble substance and the toxicokinetics of the remaining particles should be considered. For the dissolved substance, classical exposure scenarios (and following risk assessment) as described in the SCCS Notes of Guidance (SCCS/1602/18) on cosmetic ingredients can be used. Before dissolution occurs the toxicokinetics is governed by the particulate nature of the NPs, thus the location of the possible dissolution of the NPs/material (e.g. stomach, small intestines, liver) is important to consider. For possibilities of dissolution the route of potential exposure is very important. Particle distribution may be carrier-mediated and therefore be affected by corona formation and other transformations. Aggregation and agglomeration of NMs might complicate the transport across biological barriers. Particles are generally removed from the blood rapidly and distributed mainly to liver and spleen, but may also be distributed to lungs, brain and testes (e.g. Geraets *et al.*, 2014). For example, inhalation exposure may result in systemic exposure as reviewed by Hougaard *et al.* (2015) for reproductive effects. In any case, the kinetics of NMs cannot be extrapolated from the toxicokinetics of the dissolved form and needs to be determined experimentally. For more guidance, see sections 5.4 and 6.

For non-NMs, the OECD TG 417 (OECD, 2010d) addresses the assessment of toxicokinetics. However, as stated in Paragraph 9 of that guideline, it is not intended for the assessment of NMs. A recent OECD workshop (OECD, 2016d) has also concluded that this guideline was designed primarily for chemicals, for which the kinetics is governed mainly by diffusion/perfusion and metabolic processes, rather than particulates, which behave fundamentally different with respect to absorption, distribution and clearance. The OECD TG 417 (OECD, 2010d) is also considered inadequate for NMs because time-frames recommended for exposure and post-exposure observations are considered inappropriate; there are no considerations with respect to test item preparation and other relevant aspects for the inhalation route; there is insufficient consideration that relatively small changes in the exposure situation can have significant impact on the kinetic behaviour, in particular for inhalation studies.

In view of the current animal testing ban, the estimation of systemic exposure relies on the determination of translocation over *in vitro* biological barriers, i.e. dermal, oral and inhalation *in vitro* models, and on so-called physiologically based pharmacokinetic (PBPK) models for nanomaterials. A range of physiologically based pharmacokinetic (PBPK) models have been developed for some NMs (e.g. Bachler et al., 2013; Lin *et al.*, 2016; Hinderliter *et al.*, 2010 for common metal NMs, and other models available in the literature). Furthermore, an overview of NP toxicokinetics developed by ISO TC 229 Nanotechnologies has now been published (ISO/TR 22019:2019 Nanotechnologies-Considerations for performing toxicokinetic studies with NMs). In addition, OECD is currently considering to revise OECD TG 417 (OECD, 2010d) by adding toxicokinetic aspects of NMs, or draft a separate guideline for toxicokinetics of NMs. However, as further detailed in chapter 5.4.1, PBPK models as other *in silico* modelling tools are still at an elementary stage for NMs.

#### **4.4.2 Determination/Estimation of Absorption**

Relevant exposure routes for cosmetic ingredients are dermal, inhalation and oral uptake route. It is important to know whether these uptake routes lead to systemic exposure. Systemic exposure of conventional cosmetic ingredients has previously been assessed by chemical analysis of blood, tissues and excreta in *in vivo* experiments. *In vitro* models can provide information on the potential translocation/absorption over biological barriers. For the assessment of dermal absorption rates, OECD TG 428 (Skin absorption: *in vitro* method, OECD, 2004a) has been validated for conventional chemicals. For the other biological barriers there are no validated guidelines to estimate the respective translocation rates. However, such methods are available in the literature for the GI-tract and the lung.

The uptake of NMs across different barriers can be evaluated by advanced 2D (dimensional) and 3D multicellular co-culture *in vitro* models that are designed to closely mimic the *in vivo* anatomy and functionality of *in vivo* organs/barriers such as lung, alveolar and GI-tract. These models can fill the gap between external and systemic exposure. In addition, *in vitro* models for relevant internal organs and barriers such as the liver, kidney and blood brain barrier can deliver some information about the potential internal distribution, metabolism and excretion. Investigations on dissolution rates or stability in relevant biological fluids may inform on whether or not a substance remains in the nano form after uptake, as this will determine its further distribution.

Where there is evidence for systemic absorption of an NM, further investigations will be required to confirm whether the absorbed material was in particulate form or in solubilised/metabolised form. Where the absorption of NPs cannot be ruled out either by experimental data, or justified on the basis of solubility/degradation of the NM, the SCCS will apply a default approach to assume that 100% of the absorbed material was in NP form (see below). This, however, does not imply that the particulate form of a chemical is associated with a greater toxicity potential. Depending on the chemical composition of the NM, certain solubilised/metabolised forms may be more toxic than the corresponding particulate forms. This needs to be taken into account for the safety assessment.

For each uptake route, a portion of the particle entering the body can be absorbed into blood and distributed systemically.

There are 'biokinetic models' available, like the HRTM (Human Respiratory Tract Model) and the HATM (Human Alimentary Tract Model) for oral exposure. In combination with PBPK/TK models, such models allow the calculation of systemic exposure, excretion and absorbed tissue doses (ICRP, 2006).

#### **4.4.2.1 Dermal**

Dermal absorption of NMs as well as the efficacy of their transport in the human body may depend on the size of the NPs (Bachler *et al.*, 2015). Therefore, in order to calculate internal exposure, the particle size distribution under realistic exposure conditions (external exposure) needs to be related to uptake rates for similar sizes. Therefore, a dermal penetration study should be performed with a formulation containing a typical size distribution of the NM.

In addition to human skin available from surgeries, also reconstructed human epidermis (RhE) models might be useful for obtaining information on skin translocation. The models have been described in OECD TG 439 (OECD, 2019a) (*In vitro* skin irritation), and more recently for the determination of skin irritation of medical device extracts (De Jong *et al.*, 2018).

For the assessment of dermal absorption, the SCCS basic criteria for *in vitro* assessment of dermal absorption of cosmetic ingredients (SCCS/1358/10) as well as OECD TG 428 (OECD, 2004a) should be followed. However, it is of note that these guidelines have been developed for conventional chemicals. As mentioned before, data from any *in vivo* study will only be accepted if the testing was performed before the animal testing bans, or if data were obtained for the purpose of compliance with other (non-cosmetic) legislations, e.g. REACH (EU, 2008). Furthermore, high quality EM images can inform on the dermal absorption of NPs.

Measuring uptake and effects of NMs on compromised skin poses a challenge due to the current lack of standardised model(s) that can be used to generate results that are reproducible and can be used to compare studies carried out within a laboratory and between different laboratories. In view of this, OECD (2011b) has recommended studies on intact skin. According to OECD TG 428 (OECD, 2004a), *in vitro* skin absorption studies should be conducted using intact healthy skin. This is also reflected in the recommendation to perform skin integrity checks, as described in the current guidelines for *in vitro* skin penetration studies (OECD, 2004a; SCCS, 2010a, 2010b). Where studies on compromised

skin are specifically required, the models used should be well characterised to generate reproducible results, and appropriate controls should be included in the studies. Further research is needed to develop appropriate test models of compromised skin that can be reliably used to assess possible absorption of cosmetic ingredients, including NMs.

For conventional cosmetic ingredients, in cases where no (adequate) information is available on dermal absorption, the SCCS assumes 50% absorption based on literature analysis for conventional substances. However, this analysis is not valid for NMs. So far, only a very limited or no dermal absorption has been demonstrated for NMs. On the other hand, the SCCS is aware of specific modifications of NMs that can stimulate dermal penetration. In view of this, dermal absorption of NMs will need to be determined experimentally (see Annex I). Where experimental data are not provided, the SCCS will apply the **default value of 50% of the administered dose** as determined for conventional substances, or **higher if warranted by the composition of a specific NM**.

#### 4.4.2.2 Inhalation

Once deposited in the lung, (partially) soluble NMs (partially) dissolve in the lining fluid (mucus layer) of the epithelium where inert NMs may form non-dissolved colloidal suspensions. Local clearance from the airways occurs as macrophages take up the NPs and transport non-dissolved NMs (single and agglomerated but still relatively small NMs) by the mucociliary cascade up to the laryngopharynx (Yang *et al.* 2008). Soluble NMs that dissolve in the lining fluid of the lung epithelium can be transferred to the blood and distributed to the whole body (Oberdörster *et al.*, 2005). Solubility (rate and extent of dissolution) depends on chemical composition, size, coating, stability and the biological environment (Braakhuis *et al.*, 2014).

Less soluble NMs may be absorbed via cell-mediated active translocation from the site of deposition through the lung epithelium to interstitial sites. From there NMs may be directed to the local lymph nodes, and as lymph nodes are drained by blood, they may ultimately reach the systemic blood circulation. Uptake from the site of deposition into systemic blood may also happen directly by crossing the lung barrier in the alveoli (Borm *et al.*, 2006).

The possibility for uptake via the lung and thus systemic exposure can be evaluated by *in vitro* cellular models that mimic the lung alveolar barrier, the so-called air liquid interface (ALI) models (Bachler *et al.*, 2015). This model is comprised of a membrane that may contain alveolar cells either with or without macrophages added on one apical side of the membrane, and endothelial cells on the distal side of the membrane. The advantage of this model is that it simulates the actual conditions in the lung, where the cells are exposed to air on one side of the lung alveolar barrier, and to liquid on the other side. Application of the studied NPs as spray mist ensures an even and realistic application (Rothen-Rutishauser *et al.*, 2008).

Other authors have modified this model by establishing an ALI by using advanced *in vitro* studies with different combinations of cells (e.g. microfluidic platforms, see Tenenbaum-Katan *et al.*, 2018).

Where there is evidence for systemic absorption, further investigations will be required to confirm whether the absorbed material was in a NP form or in solubilised/metabolised form.



This may be investigated in experiments or justified on the basis of solubility/degradation of the NM. In the case the absorption of the particulate form cannot be ruled out, the SCCS may apply a default approach and assume that 100% of the absorbed material was in NP form.

Information on the extent of inhalation absorption should be obtained from experimental studies and/or estimated from physicochemical parameters. However, if no data are presented, the SCCS considers for conventional chemicals that for the calculation of inhalation exposure an absorption of 100% should be used (SCCS/1602/18). For the absorption of NPs from the lung, a similar **default absorption of 100% of the calculated deposition** of NPs in the lung will be used, if data on inhalation absorption are not available.

#### 4.4.2.3 Oral

Particles deposited during inhalation initially in the respiratory tract are partly transported out of the lungs and the extrathoracic airways to the larynx by mucociliary action and mainly swallowed into the GI tract.

Especially for the GI tract, dissolution and/or degradation are very important processes that reduce the amount of NM available for systemic uptake. Therefore, dissolution and/or degradation studies should be performed before any estimation of systemic uptake from the GI tract. The following parameters may indicate a loss of nano-properties or a low exposure to NPs according to EFSA (2018):

1) high dissolution rate (e.g. in water, food/feed matrix or body fluids such as synthetic gastric or lysosomal fluids); High solubility is commonly assumed, if more than 1 mol/L solvent is dissolved.

2) high rate of degradability (e.g. biological or photocatalytic) to non-nanosized degradation products. According to EFSA (2018), an NM is considered to have a high degradation rate if the degradation rate profile in the intestinal phase shows a clear decrease in the presence of particles over time (no plateau), and that 12% or less of the material (mass-based and compared with the particulate concentration at the beginning of the *in vitro* digestion) is present as particles after 30 min of intestinal digestion. This is indicative that the rest of the material should be fully degraded to non-NM (e.g. ionic) under gastrointestinal conditions.

3) the presence of/as aggregates rather than agglomerates (e.g. determined by conditions of production),

4) fixed, permanent bonding in matrices (e.g. stability of matrix, type of bond, end-of-life behaviour) or effective entrapment in food contact materials (FCMs) (e.g. polymer nanocomposites).

In the absence of data on degradation and dissolution, the SCCS would assume that 100% of the ingested material remains in particulate form.

Up to now, no *in vitro* model for the absorption on NMs via the oral route has been validated. Available *in vivo* information on oral absorption can be used provided that the

testing had been performed before the animal testing bans, or the data were obtained for the purpose of compliance with other (non-cosmetic) legislations, e.g. REACH (EU, 2008).

*In vitro* models indicated in the literature include the use of Caco-2 cells and more complicated multicellular models of cells growing on membranes (Bouwmeester *et al.*, 2011).

ICRP (2006) has developed the Human alimentary tract model (HATM) which may be useful for particle dose calculation for the GI tract. This model depicts the entry of a particle into the oral cavity by ingestion or into the oesophagus after particle transport from the respiratory tract. It describes the sequential transfer through all alimentary tract regions, including the oral cavity, oesophagus, stomach, small intestine, and segments of the colon, followed by emptying in faeces. In this model, the fractional absorption of particles is specified by the alimentary tract transfer factor that describes total absorption from all regions of the alimentary tract, although the default assumption is that all absorption takes place in the small intestine.

It is considered for conventional chemicals that no more than 50% of an orally administered dose is systemically available. Thus, in the absence of data, **50% of the administered dose is used as the default oral absorption** value for a cosmetic ingredient and the  $POD_{sys}$  (see section 6) is derived from the POD by dividing by 2. If there is information to suggest **poor oral bioavailability, a default value of 10% oral absorption could be considered** (SCCS/1608/2018). For NMs, depending on solubility, oral absorption can be expected to be lower. Therefore, whenever oral absorption data are available, these should be used, also when using other dose descriptors. Also, *in vitro* translocation/migration data, along with any other available kinetic data, should be considered.

When data on dissolution and/or degradation of the NMs are available, the non-dissolved/degraded fraction could be used as a starting point for default absorption data.

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For the exposure assessment of NM, in principle the same exposure scenarios and assessment methodology can be applied as for bulk substances. However, during consumer use the NM characteristics may be different from laboratory conditions (e.g. variable versus stable particle size-distribution), so that a larger number of experimental conditions may need to be investigated. The estimates of exposure should be provided in mass per volume metric. Additionally, where relevant, other metrics such as particle number and size distribution, and surface area should also be provided.

NMs may undergo degradation or dissolution on their way into the body, where internal exposure occurs. For example, after oral exposure, NMs may be completely dissolved in the gastrointestinal tract. In order to demonstrate this, suitable *in vitro* methods should be used. In the absence of respective data, the SCCS will assume no dissolution.

The uptake and bio-kinetics of NMs is governed by processes that are different from (solubilised) substances as the transport of particles across biological barriers is not based on diffusion gradient-driven partitioning, but on endocytosis or other active transcellular transport mechanisms. The uptake of NMs across different barriers can be evaluated by advanced 2D (dimensional) and 3D multicellular co-culture *in vitro* models that are designed



to closely mimic the *in vivo* anatomy and functionality of *in vivo* organs/barriers such as lung, alveolar and GI-tract.

Where there is evidence for systemic absorption, and absorption of NPs cannot be ruled out either by experimental measurements or justified on the basis of solubility/degradation of the NM, the SCCS will apply a default approach and assume that 100% of the absorbed material was in nanoparticulate form.

Further default values apply for absorption: In the absence of experimental data, the SCCS will apply the default value of 50% dermal absorption of the administered dose as currently used for conventional substances. If warranted by the composition of a specific NM, a higher value may be used. For inhalation exposure to products in spray form and for volatile cosmetic ingredients, in the absence of data on absorption, a default absorption percentage of 100% of the calculated deposition of nanoparticles in the lung will be used. For oral absorption, in the absence of data on absorption a default value of 50% of the administered dose is used. If there is information to suggest poor oral bioavailability, a default value of 10% oral absorption could be considered.

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## **5. HAZARD IDENTIFICATION AND DOSE-RESPONSE CHARACTERISATION**

### **5.1. General Considerations**

Safety assessment of a cosmetic ingredient involves evaluation of its potential to cause a health risk to the consumer. This has historically been based on data from a series of *in vivo* studies in animals. However, due to the EU ban on animal testing of cosmetic ingredients and products, safety data from *in vivo* studies can only be used if the tests have been performed in accordance with the provisions laid down in Cosmetic Regulation (EC) No 1223/2009. This means that *in vivo* data can only be accepted if testing of ingredients was performed before the animal testing ban deadlines of 11 March 2009 and 11 March 2013 as given under Article 18 of Cosmetic Regulation (EC) No 1223/2009. It is also possible that some ingredients used in cosmetic products are also used in other consumer and industrial sectors, such as pharmaceuticals, food, and industrial chemicals. As such, they may have been tested on animals under the relevant legal frameworks. For example, some ingredients used in cosmetics may also be subject to the requirements of REACH regulation (EU, 2008), and as a last resort testing may have been performed on animals to complete the respective data packages. For cases where animal tests have been clearly driven by compliance with a non-cosmetic regulatory framework, such data may be used for the safety assessment of cosmetics. Apart from such specific situations, all toxicological data for use in cosmetics safety assessment needs to be derived from alternative non-animal means - such as *in vitro* assays and *in silico* modelling (see also Appendix 4 of the SCCS Notes of Guidance (SCCS/1602/18) for a non-cosmetic application

[https://echa.europa.eu/documents/10162/13628/reach\\_cosmetics\\_factsheet\\_en.pdf](https://echa.europa.eu/documents/10162/13628/reach_cosmetics_factsheet_en.pdf)).

Various reports and reviews published so far have concluded that the existing risk assessment paradigm, in use for conventional chemicals should, in principle, be applicable to engineered NPs. However, it has also been pointed out that the current testing methods may need certain adaptations to take account of the special features of NPs (SCENIHR, 2007; Rocks *et al.*, 2008; SCENIHR, 2009; OECD, 2009c; SCCS, 2012; EC, 2012; ECHA, 2012; EFSA, 2018).

Thus, although safety assessment of an NM requires consideration of the same criteria applicable to other (non-nano) cosmetic ingredients, there are certain special aspects that need to be considered for a cosmetic ingredient if it falls within the definition of an NM under the Cosmetics Regulation (EC) No 1223/2009.

As already mentioned in section 3, a thorough physicochemical characterisation of the NM is crucially important in planning studies into the potential behaviour and effects. The initial focus of hazard assessment needs to be on determining ADME parameters to investigate the potential of the NM for systemic availability through the relevant uptake route(s) (oral, dermal, via inhalation) dependent on product type.

If there is convincing evidence that the NM is not systemically available, information on local toxicity considering the relevant exposure route as well as information on genotoxicity should be provided. Although not a local toxic effect, sensitisation can be initiated after an NM becoming bioavailable in the skin.

Where the evidence suggests systemic availability of an NM, studies carried out in consideration of nano-specific aspects and addressing a base set of systemic toxicological endpoints will be needed, in addition to local toxicity and genotoxicity. In case where systemic exposure cannot be shown to be insignificant, further information on carcinogenicity and reproductive toxicity may be required. Data on photo-induced toxicity are specifically required when a cosmetic product is expected or intended to be used on sunlight-exposed skin and is able to absorb light. Several *in vitro* methods exist for the identification of toxicological hazards. However, information on dose-response relationships that can be used in the current risk assessment scheme, e.g. NOAELs, LOAELs or BMDLs, has up to now generally been derived from *in vivo* studies and these tests are only accepted under the conditions described at the start of this section.

## **5.2. Requirements for Dossiers on nanomaterials as cosmetic ingredients**

When a safety dossier on a cosmetic ingredient is submitted for evaluation by the SCCS, the Applicant provides the Commission with all available information in regard to the required toxicological endpoints. These have been listed in the SCCS Checklists for Applicants submitting dossiers on cosmetic ingredients to be evaluated by the SCCS (SCCS/1588/17) corresponding to Cosmetics Regulation (EC) No 1223/2009, Article 16 d, which includes 'Checklists For Nanomaterials In Cosmetics'.

Depending on the nature and extent of exposure, one or more toxicological endpoint(s) may be regarded as not relevant for safety assessment by the Applicant. In such cases, the Applicant must provide a scientifically valid justification for not addressing the endpoint(s).

More details on the specific requirements for toxicological assessment are provided in Annex 2 to this Guidance.

To avoid unnecessary testing, each safety assessment/ evaluation of an NM cosmetic ingredient should start with an evaluation of relevant studies that are already available in the scientific literature. A systematic review of the scientific literature must therefore be provided by the Applicant as an essential part of the safety dossier. This should also include the search terms used in the review, the total number of relevant articles found, and the basis for selecting and excluding the articles for drawing conclusions. In particular, scientific reasoning must be provided for not considering any articles that may be in contradiction with the conclusions drawn by the Applicant.

Study results submitted as part of a safety dossier should accompany a declaration that the relevant tests were conducted using a substance with the same (or comparable) chemical purity/impurity profile, and physicochemical characteristics to that intended for inclusion in the finished cosmetic product (SCCNFP/0633/02). Considering NMs, this means that the test substance and the substance in the finished cosmetic product both have the same or comparable profiles, in relation to chemical composition, size and size distribution, surface properties, morphological form, etc. Proper characterisation/ identification of the NM used in the various toxicity studies and as used for cosmetic ingredient is therefore essential.

Furthermore, it means that safety of an NM must not be based on the assumption that the bulk form (or another nano form) of the same materials is safe, and vice versa, without specific evidence to support it. The inclusion of non-relevant data – for example relating to unrelated materials, or materials with unknown characterisation – should be avoided. If data from other materials are to be included (e.g. a bulk material as a comparator), it should be clearly defined and segregated, and not presented in a mixed-up form with the data on NM(s) under evaluation. Unless there is a close similarity between different NMs, it is advisable to include a complete set of supporting data on each NM, rather than presenting several different NMs in a single, patchy, and data-poor submission. If more than one NM is to be included in the dossier, the basis for 'close similarity' must also be provided to allow data read-across between the NMs. This substantiation should not only relate to the chemical composition of the core NM, but also the physical/morphological features and other characteristics, such as surface coating and/or other modifications (SCCS 1524/13).

Information on the stability of the test substance under experimental conditions is of prime importance for the interpretation of any test results (Section 3.1). Data on the stability of the test material should therefore be reported, and data on the dissolution rate and the solubility of the NM in the finished cosmetic product and in the vehicle(s) used in the tests must be provided (if applicable).

Together with the data on relevant experimental investigations, the following information should be available:

- for in vivo studies: the study date (whether in line with the Cosmetic Regulation) and/or the regulatory context for which the study has been performed;
- any report on epidemiological and/or observational experiences (e.g. cosmetovigilance data);
- an appraisal of all relevant published literature, along with a description of the bibliographical methods used; any information from 'grey material' available. Any other relevant findings by the Applicant and/or other industry/ agencies should also be transmitted to the Commission for review.

Safety assessment of cosmetic ingredients has historically been based on data from *in vivo* studies in animals. Due to the ban on animal testing of cosmetic ingredients and products, *in vivo* data can only be used if the tests were either performed before the ban, or to fulfil other (non-cosmetic) regulatory requirements. In this regard, the existing risk assessment paradigm for conventional chemicals should in principle be also applicable to NMs, but some testing methods may need to be adapted to take account of the nano-related aspects.

A thorough physicochemical characterisation of NMs is crucial. The initial focus of hazard assessment should be on ADME parameters to determine the potential for systemic availability considering all relevant uptake route(s). If there is convincing evidence that the NM is not systemically available, information on local toxicity considering relevant exposure route(s) as well as information on genotoxicity should be provided. Although not a local toxic effect, sensitisation can be initiated after an NM becoming bioavailable in the skin. Where there is evidence for systemic availability of an NM, studies addressing a base set of systemic toxicological endpoints will be needed, in addition to local toxicity, sensitisation and genotoxicity. If systemic exposure is possible, further information on carcinogenicity and reproductive toxicity may be required. Data on photo-induced toxicity are specifically required for a cosmetic product intended to be used on sunlight-exposed skin and able to absorb light.

When submitting a safety dossier on a cosmetic ingredient, the Applicant should follow the SCCS Checklists to ensure that a complete set of data/information is provided for safety assessment. It is crucial that first an up-to-date systematic review of the scientific literature should be performed and provided as an essential part of the safety dossier. It should also detail the search terms used, the total number of relevant articles found, and the basis for selecting and excluding the articles.

Information on the stability of the test substance under experimental conditions should be provided. Study results should clearly state that both the test substance and the substance in the finished cosmetic product, have the same or comparable physicochemical profiles. If the same data have been used for more than one NM, the basis for a 'close similarity' must also be provided to allow data read-across.

Scientifically valid justification must be provided for not addressing any endpoint(s) if they are regarded by the Applicant as not being relevant for safety assessment - e.g. due to the nature and extent of exposure.

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## **5.3. Specific Considerations relating to testing of Nanomaterials**

### **5.3.1. Solubility/Dispersion**

When testing insoluble or partially-soluble NPs, it must be kept in view that they will be present in a dosing or test medium as a nano-dispersion rather than as a solution. Therefore, special attention should be paid to the agglomeration/ aggregation behaviour, and the insoluble/ partially-soluble nature of NMs (SCCP, 2007; Rocks *et al.*, 2008; SCENIHR, 2009; OECD, 2009c; Chaudhry *et al.*, 2010; Gottardo *et al.*, 2017). Possibilities for disagglomeration of NPs under different testing and physiological conditions should also be considered (OECD, 2012a).

During toxicological evaluations, some properties of NMs may change due to interaction with the surrounding media. Thus, a focus of investigations should be on ascertaining that the tested NMs are in exact form/ composition as intended for use in a cosmetic formulation, and as the formulation is delivered to the end-user. Where toxicological data on a different NM, or a different form of the same NM, is presented in the dossier, justification must also be provided to indicate that the two are justifiably comparable.

Special care is also needed in regard to the applied doses, because the concentration of an NM may decrease during a test due to sedimentation, binding with other moieties in the test medium, or adhesion to glass/plastic ware. It is therefore important to ascertain the stability and uniformity of the NM dispersion in a test medium to ensure that the applied concentration/ dose is maintained for the intended period during the test. Possible interaction of the NM with other components of a test medium/ formulation will also need determining.

### **5.3.2. Surface interactions**

The interactions of an NM with the surrounding media and biological systems largely take place through its surface. The surface characteristics of particles are determined by the nature of the entities present on the surface due to the inherent (bio)chemical composition of the material itself, or because of other moieties that may have adhered or attached to the surface due to van-der-Waals forces or electrostatic interactions, or may have been deliberately applied as a coating. It is well known that due to high surface energies NPs tend to stick together to form larger agglomerates and aggregates, and may adsorb or bind various moieties on the surface, including proteins (Cedervall *et al.*, 2007; Šimon and Joner, 2008; Lynch and Dawson, 2008; Monopoli *et al.*, 2012; Moore *et al.*, 2015). AN NM with different surface characteristics (e.g. hydrophilic versus hydrophobic surface) may have profoundly different ADME properties and may interact differently with biological fluids, cell membranes and other biological entities (Mirshafiee *et al.*, 2016). In view of the potential agglomeration/aggregation of particles, it is essential that attention is paid to the process used for dispersing NPs in preparations used in toxicological testing.

It has been shown that composition of protein corona is highly dependent on the initial mixing steps involved (Jayaram *et al.*, 2018; Lundqvist *et al.*, 2011; Simon *et al.*, 2018).

Due to the potential to bind other moieties on surface, and penetrate cellular membrane barriers, NPs may transport other substances into the test systems (the so-called 'Trojan Horse' effect), which may lead to altered (increased or decreased) activity/toxicity. For example, NPs may bind and carry certain immunogens/antigens to the immune cells and impart or trigger an immunological effect.

Such a transport of certain components of the test systems by NPs may also lead to artefacts and false indications of harmful effects. This can be avoided by a thorough characterisation of the NMs, and the use of appropriate controls within the testing scheme. Selection of controls should also consider possible interaction of the NM with the readout system of the assay as it has been demonstrated for various NMs for tetrazolium salts or other dye-based cytotoxicity assays (Worle-Knirsch *et al.*, 2006; Monteiro-Riviere *et al.*, 2009; Lanone *et al.*, 2009; Wilhelmi *et al.*, 2012; ECHA, 2017b). In case of a doubt over the validity of the outcome of an assay, the use of an additional independent analytical method may provide more information (ECHA, 2017b). The presence of a light-absorbing/ reflecting

NM in the assay can itself have an influence on a read out system, especially if the readout is based on spectroscopy. Similarly, the composition of the culture medium (e.g. the presence or absence of serum) in a test system may influence the outcome of the assay.

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Special attention should be paid to agglomeration/aggregation behaviour, and the insoluble/partially-soluble nature of NMs. Possibilities for de-agglomeration of NPs under different testing and physiological conditions should also be considered. As properties of NMs may change during toxicological evaluations due to interaction with the surrounding media, investigations should also focus on whether the tested NMs are in exact form/composition as intended for use in a cosmetic formulation delivered to the end-user. The Applicant should also consider any changes in the applied doses of NMs due to sedimentation, binding/adhesion with test medium or glass/plastic ware to ensure that the applied concentration/dose is maintained during the test. The so-called 'Trojan Horse' effect and possible interaction of the NM with the readout system of the assay should also be considered. Furthermore, proper controls should be in place to evaluate possible interference especially when colorimetric methods are used as readout system.

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### **5.3.3 General criteria to be considered for different coatings on a nanomaterial**

Particle surfaces of reactive (e.g. photocatalytic) NMs are generally modified, coated, or doped with other materials to 'quench' the reactivity before use in cosmetic products. Surface modification of an NM, however, may also bring about profound changes in the physicochemical properties (e.g. hydrophobicity/hydrophilicity), ADME profile and interaction with biological entities. A significant alteration in the properties and biokinetic behaviour may also alter their toxicity due to the potential penetration and accumulation of particles in organs that are not expected to be the target of an unmodified or a differently-coated form of the same NM. It is therefore important that not only the NMs, and the materials used for surface modification, are assessed individually, but that they are also assessed for safety together when in the form of a surface-modified/coated NM. In particular, a major change in hydrophobicity of the NP surfaces may affect dermal absorption. This raises the question whether an NM with several different surface modifications/coatings will need to be tested each time.

The SCCS Opinion (SCCS/1580/16) has considered the use of different coatings on an NM in the context of titanium dioxide (nano-form). In brief, where a coating material applied to an NM surface has not already been evaluated for such an application, it will need to be demonstrated to the SCCS to be safe and not affect the particle properties related to behaviour and/or effects. In this regard, a full dataset on the physicochemical properties, biokinetic behaviour and toxicological effects of the NM with each new surface modification/coating would be preferable. However, as a minimum, in addition to safety data on the core NM, the SCCS will require the following:

1. Information/data on each material used for surface modification/coating of the NM to indicate that it is safe for use in the intended cosmetic product - e.g. it is an approved cosmetic ingredient, or not a banned or restricted substance under Annex II and III of the Regulation (EC) No 1223/2009.



2. Data on physicochemical properties of the surface-modified/coated NM to show that they have not significantly changed compared to the same material when uncoated or with a different surface modification/coating that has already been assessed as safe by the SCCS. However, when a coating is applied for a specific purpose (e.g. reduction of (photo)catalytic activity), the effect of the coating on the intended activity should also be demonstrated.
3. Data on dermal penetration, stability of the surface modification/coating, and (photo)catalytic activity (where final products are intended for use on skin exposed to sunlight) of the NM to indicate that:
  - a. the surface modification/coating is stable in final formulation,
  - b. the surface modification/coating does not lead to any significant absorption of the nanoparticles through the exposure route(s) anticipated for the intended use,
  - c. the (photo)catalytic activity of the surface modified/coated NM is relatively low (i.e. not more than 10% compared to the non-coated equivalent).
  - d. when testing a combined use of different coating materials, a combination of the individual concentrations that represents 'worst case' in terms of hydrophobicity should be used and justification why a certain combination should be considered as worst case should be given.

The SCCS would consider an NM that has been surface modified or coated with a new substance 'similar' to an already assessed surface variant of the same NM if both compare well in terms of the above criteria. However, a full toxicological dataset would be required for safety evaluation if the new material used for surface modification/coating is not already known to be safe, or brings about a significant change in the physicochemical properties, dermal absorption, and/or (photo)catalytic activity of an NM.

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Where a coating material is applied to an NM surface, it will need to be demonstrated to the SCCS to be safe and not to affect the properties relating to particle behaviour and/or effects with exception of the intended modification/purpose. As a minimum, data/information should indicate that: 1) each material used for surface modification/ coating is safe for use in the intended cosmetic product; 2) data on physicochemical properties of the surface-modified/ coated NM to show that they have not significantly changed compared to uncoated form of the same material (or with a different surface modification/ coating that has already been assessed safe by the SCCS); and 3) data on dermal penetration, stability of the surface modification/coating and (photo)catalytic activity of the NM (for use in products intended for application on skin exposed to sunlight). Where more than one coating material is applied, data should be provided on a combination of the individual concentrations which represents 'worst case' in terms of hydrophobicity.

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#### **5.3.4 Nano-carriers and nano-encapsulated materials**

Encapsulation and other forms of formulation have been increasingly used to develop nano-sized carriers or delivery systems for (bioactive) substances (Sabliov *et al.*, 2015). For such



applications, it is imperative that safety assessment not only considers safety of the individual components (e.g. the encapsulating material and the encapsulated contents), but also safety of all the components when put together in the form of a nano-sized entity (Chaudhry and Castle, 2015; EFSA, 2018). This is because nano-sizing of substances may impart certain changes in their properties, behaviour and effects compared to corresponding conventional forms and data on safety of individual components in conventional forms may not be sufficient for safety assessment when they are in the form a nano-encapsulated entity. The Applicants should therefore provide a clear description of the nano-encapsulated entity in terms of chemical composition, purity, concentration, as well as physicochemical properties, stability, and dermal penetration of both the components and the nano-encapsulated entity. Safety assessment of such applications will also require consideration of the potential toxicological effects and exposure estimates under foreseeable use conditions for each component as well as the nano-encapsulated entity as a whole. The intended function and uses of the nano-encapsulated forms should also be clearly described.

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For encapsulated NMs, a clear description of the intended function and uses, chemical composition, purity, concentration, as well as physicochemical properties, stability, and dermal penetration of the components of the nano-encapsulated entity should be provided. Safety assessment should consider toxicological and exposure aspects under foreseeable use conditions for each component, as well as the nano-encapsulated entity as a whole.

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### **5.3.5. Immunotoxicity**

NPs absorbed into the body through different routes of exposure may lead to immunological effects. Research shows that some NMs can stimulate and/or suppress the immune responses and that their interaction with the immune system is largely determined by their size, shape, composition, surface properties, protein binding and administration routes (Najafi-Hajivar *et al.*, 2016). Such effects may result from induction of reactive oxygen species, apoptosis, cell cycle inhibition, complement activation, enhanced secretion of cytokines and chemokines, interaction through toll-like receptors, inflammatory responses, induction of autophagy, reduced viability of the major cell types involved in the innate and adaptive immune system (Pandey and Prajapati, 2017).

Due to the potential for binding other substances on the surface, NPs need special attention because they may carry other substances including proteins to the immune cells and thus act as a 'Trojan horse'. This has also been exploited in the form of NP carriers of various immunogens in the development of vaccines. For example, nano-silica has been proposed as a vaccination platform for allergen-specific immunotherapy (Scheiblhofer *et al.*, 2016). In addition, particles including NPs can modify immune responses (Himly *et al.*, 2017) and are known to exacerbate allergic responses in the lung (De Haar *et al.*, 2006; Falcon-Rodriguez *et al.*, 2016; Meldrum *et al.* 2018). The sensitisation potential of the NMs used in cosmetics is evaluated as part of safety assessment. It is also important to ascertain that any systemically or locally available NMs in cosmetic products will not exert an adverse effect on the immune system. The toxicological studies should investigate potential immunological effects where data indicate either systemic availability of the NPs through the likely route(s) of exposure, or a potential for local contact of NPs with the immune cells. This should receive particular emphasis if an NM is composed of, or contain on the surface, any

peptides/proteins or other immunogenic substance(s). This topic has been recently reviewed by EFSA (2018) and different methods for determining immunogenicity/allergenicity and immunotoxicity have been proposed.

Currently, there are no regulatory documents specifically dedicated to evaluate immunotoxicity of NMs. Their immunotoxicity assessment is performed based on existing guidelines for conventional substances or medicinal products (Giannakou *et al.*, 2016). Research groups involved in developing NMs already use a wide range of *in vitro* assays to screen for essential aspects of the immunosafety profile that are not included in the current regulatory guidance. For example, a number of international projects have produced guidelines for testing strategies and test methods, including *in vitro* assays, for NM safety evaluation (e.g., the FP7 EU projects NANOMMUNE and MARINA). Dobrovolskaia and McNeil (2016) reported a number of *in vitro* immunoassays that provide results with a good or fair correlation to *in vivo* assay outcomes. Good correlation was indicated for the *in vitro* assays of hemolysis, complement activation, opsonization and phagocytosis, and cytokine secretion assays. Other assays can also be regarded as broadly predictive of the functional alterations of the immune system, including the Colony Forming Unit-Granulocyte Macrophage assay, the leukocyte proliferation test (immunomodulatory assays), platelet aggregation, leukocyte procoagulant activity, and various plasma coagulation tests (thrombogenicity assays). Detailed protocols of many of these assays have been published recently (McNeil *et al.*, 2018).

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For systemically or locally available NMs in a cosmetic product, it is important to ascertain that they will not exert an adverse immunological effect. This is particularly important for NMs that are composed of, or contain on the surface, peptides/proteins or other immunogenic/allergenic substance(s). A number of *in vitro* immunoassays can provide results with a good or fair correlation to *in vivo* assay outcomes.

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### **5.3.6. Genotoxicity**

Mutagenicity refers to the induction of permanent transmissible changes in the amount or structure of the genetic material of cells or organisms. These changes may involve a single gene or gene segment, a block of genes or chromosomes. The term clastogenicity is used for agents giving rise to structural chromosome aberrations. A clastogen causes breaks in chromosomes that result in the loss or rearrangement of chromosome segments. Aneugenicity (aneuploidy induction) refers to the effects of agents that give rise to a change (gain or loss) in chromosome number in cells, resulting in cells that do not have an exact multiple of the haploid number (2006/1907/EC).

NMs may induce genotoxic damage by a) primary (direct or indirect) or b) secondary mechanisms: i) directly by interaction with DNA, by disturbing the process of mitosis, or by producing Reactive Oxygen Species (ROS) directly or after alterations of mitochondrial functions or ii) by secondary mechanisms as result of oxidative DNA attack during NM-elicited chronic inflammation caused by activation/recruitment of immune cells, such as macrophages and/ or neutrophils (Magdolenova *et al.*, 2014; OECD, 2014b; KEMI, 2016; Evans *et al.*, 2017).

For *in vitro* genotoxicity assessment, both chromosomal damage (clastogenicity and aneugenicity) and gene mutations should be evaluated. The widely used bacterial reverse mutation (Ames) test is not considered appropriate for NM mutagenicity assessment, due to limited or no uptake of NMs by the bacteria (SCCS/1484/12). The bacterial cell wall hinders uptake and thus NP internalisation is unlikely to occur to the same extent as observed in mammalian cells, hence sensitivity of the assay is questionable (Doak *et al.*, 2012; Magdolenova *et al.*, 2014, Dusinska *et al.*, 2017, Elespuru *et al.*, 2018).

It is therefore suggested that for NMs the following *in vitro* genotoxicity tests be conducted:

- Mammalian cell chromosome aberration/clastogenicity tests (either *in vitro* chromosome aberration test or micronucleus test). The micronucleus test can be performed using either the mononucleate or cytokinesis blocked protocols. However, if the cytokinesis blocked micronucleus assay is to be applied then the blocking agent (cytochalasin B) addition must be post-treatment (after the NM exposure period). Alternatively, a delayed-co-treatment protocol is also acceptable if a sufficient NM exposure period has been allowed to enable uptake into the test system cells. Co-exposure to both cytochalasin B and the test NM for the duration of the experiment should be avoided due to possible interference of NMs with cytochalasin B in terms of the cellular uptake of the NM (Li *et al.*, 2017).
- An *in vitro* mammalian cell gene mutation test (e.g. Hypoxanthine-guanine Phospho Ribosyl Transferase (Hprt), Thymidine Kinase (Tk) or Xanthine-guanine Phospho Ribosyl Transferase gene (Xprt) tests).
- Other indicator tests, such as the comet assay may be included for further weight of evidence. The Comet assay modified with repair enzymes is useful for detection of DNA oxidation damage induced by NMs (Collins *et al.* 2017a). The Comet assay is especially suitable in a high throughput version (Collins *et al.*, 2017b, El Yamani *et al.*, 2017), to cope with large numbers of NM samples, concentrations, and incubation times. Another useful indicator test is the cell transformation assay (CTA) (Sasaki *et al.*, 2014).

For *in vitro* genotoxicity studies, it is necessary to demonstrate uptake of the NPs in the cell and preferably the nucleus to demonstrate exposure of cellular target structures (e.g. DNA). If such exposure cannot be demonstrated, a negative outcome of such assay might be meaningless, as the target exposure will not be known. In addition, the amount taken up by the cells may be considered for expression of the possible dose response relationship (OECD, 2014b).

Properties of NMs such as adsorption capacity, optical properties, hydrophobicity, chemical composition, surface charge and surface properties, catalytic activities as well as agglomeration can result in interference with standard toxicity tests (Guadagnini *et al.*, 2015) see also section 5.3.2 above. Agglomeration of NMs affects their bioavailability to the cell and thus might lead to false positive/negative results. Several cytotoxicity, oxidative stress and genotoxicity assays, such as the comet assay and the micronucleus test, have been investigated for the possibilities of such interferences and suggestions made for a modification of the micronucleus assay to ensure correct genotoxicity assessment (Doak *et al.*, 2009, 2012; Magdolenova *et al.*, 2012) and for inclusion of additional controls (Magdolenova *et al.*, 2012; Azqueta and Dusinska, 2015; Huk *et al.*, 2015; Bessa *et al.*, 2017).

For *in vitro* genotoxicity assessment, both chromosomal damage (clastogenicity and aneugenicity) and gene mutations should be evaluated. The widely used bacterial reverse mutation (Ames) test is not considered appropriate for NM mutagenicity assessment and an *in vitro* mammalian cell gene mutation test should instead be carried out. Other indicator tests should also be considered, such as Comet assay modified with repair enzymes, and the cell transformation assay (CTA). It is imperative that assessment of cellular and preferably nuclear uptake is also carried out to demonstrate target exposure during the *in vitro* genotoxicity studies.

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### 5.3.7. Carcinogenicity

Substances are defined as carcinogenic if they induce tumours (benign or malignant) or increase their incidence, malignancy or shorten the time of tumour occurrence when they are inhaled, ingested, dermally applied or injected (ECB, 2003).

A carcinogenicity study is in general only submitted when already available; e.g., when carried out before the animal testing ban or when generated for compliance under a different (non-cosmetic) legislative framework (due to animal testing ban). The decision on the carcinogenic potential of mutagenic or genotoxic substances may thus be made on the outcome of *in vitro* mutagenicity tests. A positive *in vitro* result in mutagenicity tests is also seen as indicative of the carcinogenic potential of the substance (SCCS/1602/18). There are several ongoing initiatives to develop *in vitro* tests for the indication of carcinogenicity. New *in vitro* approaches, such as cell transformation assays (CTAs) or toxicogenomic approaches may also be useful for the identification of genotoxic as well as non-genotoxic carcinogenic NMs. The latter in combination with transcriptomics provide mechanistic information at the molecular level. Additionally, novel toxicity endpoints such as epigenetic toxicity will have to be considered in the future. Epigenetics refers to heritable changes in gene expression that occur without alterations in DNA sequence. A growing body of evidence indicates that environmentally-induced epigenetic alterations play a role in the onset of several human diseases, including cancer, mental disorders, obesity, and other severe conditions (reviewed by Smolkova *et al.*, 2015, Marczylo *et al.*, 2016 and Smolkova *et al.* 2017). Several studies show that epigenetic toxicity can be induced by NMs and can occur at sub-cytotoxic and sub-genotoxic concentrations (Ghosh *et al.*, 2017).

So far only the *in vitro* CTAs that can detect both genotoxic and non-genotoxic carcinogens have been validated. CTAs are *in vitro* tests measuring the conversion from normal to transformed phenotype of mammalian cells (primary Syrian hamster embryo (SHE), or stable cell lines such as mouse BALB/c-3T3 or C3H/10T1/2 cells when exposed to test compounds. A guidance document on the *in vitro* SHE CTA was adopted in 2015 by the OECD (OECD, 2015a). The OECD Guidance Document on *In Vitro* Cell Transformation Assay Based on the Bhas 42 Cell Line was adopted in 2016 (OECD, 2016f).

The CTAs have been used to test NMs (and larger particles and fibres) (Ponti *et al.* 2009; Ohmori *et al.*, 2013; Gabelova *et al.*, 2017). SHE and BALB/c 3T3 CTAs have the potential to detect non-genotoxic as well as genotoxic carcinogens. The most frequently used endpoint is morphological transformation. Morphologically transformed cells are characterised by the loss of density-dependent regulation of growth and the formation of

colonies with crisscrossed cells or foci of piled-up cells that are not observed in untreated control cultures (Sasaki *et al.*, 2014; Gabelova *et al.*, 2017). CTAs are promising tests for predicting NM-induced cell transformation as one of the crucial carcinogenicity endpoints.

An international Working Group of experts convened by the International Agency for Research on Cancer (IARC) has identified 10 key characteristics (see SCCS Notes of Guidance SCCS/1602/18) of established human carcinogens that should be taken into account (Smith *et al.*, 2016). That opinion, originally prepared to facilitate a systematic and uniform approach to organising the available mechanistic data relevant to carcinogens in a standard form, could also be applied for assessment of many cases of NMs. High-throughput assay systems, such as the US Environmental Protection Agency's (EPA) Toxicity Forecaster (ToxCast) program (Chiu *et al.*, 2017), which can provide *in vitro* mechanistic data on many of the key characteristics, may be useful in the overall weight of evidence assessment. However, as the ToxCast database is on conventional chemicals it may be of limited use for NMs.

Identifying non-genotoxic carcinogens is a challenge in the absence of recourse to animal testing. Because non-genotoxic compounds can exert carcinogenicity through different mechanisms, it is advisable that a battery of tests (as exemplified above) should be used to exclude the non-genotoxic carcinogenicity potential of the NM.

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Although a carcinogenicity study is only submitted when already available due to the EU ban on *in vivo* testing of cosmetic ingredients/products, a positive *in vitro* result in mutagenicity testing should be seen as indicative of the carcinogenic potential of the substance. *In vitro* approaches, such as cell transformation assays or toxicogenomic approaches, may also be useful for the identification of genotoxic as well as non-genotoxic carcinogen NMs.

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### **5.3.8. Developmental and reproductive toxicity of nanomaterials**

The database on developmental and reproductive toxicity of NMs following skin exposure or exposure by inhalation is very limited. Indeed, it is only recently that attention has been directed towards the potential reproductive toxicity of NMs (Hougaard *et al.*, 2015; Wang *et al.*, 2019; Skovmand, 2019). Some NMs have been shown to pass through the blood–testis barrier, placental barrier, and epithelial barrier, which protect reproductive tissues, and then accumulate in reproductive organs. However, only in a few studies an effect on fetuses was noted after particle inhalation (Campagnolo *et al.*, 2017; Bernal-Melendez *et al.*, 2019).

The literature also provides some limited evidence that some NMs (such as anatase TiO<sub>2</sub> particles) after oral exposure may affect foetal development of the male reproductive system. It has been shown that accumulation of NMs in reproductive organs (testis, epididymis) may cause damage to those organs by destroying Sertoli cells, Leydig cells, and germ cells, causing reproductive organ dysfunction that adversely affects sperm quality, quantity, morphology, and motility (Winkler *et al.*, 2018; Wang *et al.*, 2019). Some observations on the female reproductive system have also been made, such as a reduction in the number of mature oocytes and disruption of primary and secondary follicular development. However, reproductive function in female offsprings has hardly been studied and cannot be commented upon. In addition, NMs (such as anatase TiO<sub>2</sub>) can disrupt the

levels of secreted hormones, causing changes in sexual behaviour. Neurodevelopmental consequences of nano-TiO<sub>2</sub> exposure were suggested by a study in which pregnant Wistar rats were treated by oral gavage with anatase TiO<sub>2</sub> particles (primary size of 10 nm) at 100 mg/kg body weight (Mohammadipour *et al.*, 2014).

The molecular mechanisms involved in NM toxicity to the reproductive system are not clearly understood yet, but possible mechanisms include oxidative stress, apoptosis, inflammation, genotoxicity or endocrine activities. Previous studies have shown that NPs can increase inflammation, oxidative stress, and apoptosis and induce ROS, causing damage at the molecular and genetic levels which results in cytotoxicity. It is also plausible that NPs may translocate from the respiratory tract to the placenta and foetus. In addition, adverse effects may occur secondarily to maternal inflammatory responses (Hougaard *et al.*, 2015).

Effects of NPs used in cosmetic products should be considered for potential reproductive effects including mechanisms and ED mediated mode of action. Due to the animal testing ban, NAMs should be evaluated for potential reproductive toxicity using a weight of evidence approach. Further research and development is required in this area, in particular with regard to the value of *in vitro* testing by the embryonic stem cell test, the micromass embryotoxicity assay, and the whole rat embryoculture.

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The database on developmental and reproductive toxicity of NMs following skin exposure or exposure by inhalation is currently very limited. NMs used in cosmetic products should be considered for potential reproductive effects, including endocrine mediated mode of action. Due to the animal test ban, a weight of evidence should be derived from NAMs for potential reproductive toxicity of NMs.

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#### **5.4. Considerations for the replacement of *in vivo* testing by *in vitro* testing**

Among the available alternatives, *in vitro* and *ex vivo* assays, and *in silico* modelling approaches take a prominent place. Generally, these methods aim to reduce, refine, or replace the use of experimental animals. However, there is no stand-alone *in vitro* or *ex vivo* test at present that can replace a standardised *in vivo* method for toxicological assessment of NMs (Shatkin and Ong, 2016; Burden *et al.*, 2017).

A tiered approach based on non-testing and *in vitro* methods has therefore been proposed for the prediction of realistic biological outcomes (Oberdörster *et al.*, 2005; SCENIHR, 2007; Stone *et al.*, 2009; Hirsch *et al.*, 2011; Dekkers *et al.*, 2016) when used in a weight of evidence (WoE) approach (SCHEER, 2018). The proposed approach involves thorough physicochemical characterisation of NMs, *in vitro* screening tests including '-omics', the use of non-testing approaches (*in silico* models, read across) and the use of OECD and EURL ECVAM validated/ approved *in vitro* methods. A model for tiered nanotoxicity screening has been proposed for risk assessment of NMs (Oberdörster *et al.*, 2005; SCENIHR, 2007; Stone *et al.*, 2009; Hirsch *et al.*, 2011; Dekkers *et al.*, 2016; EFSA, 2018).

For cosmetic purposes, only data from **validated replacement** methods are accepted. However, in the absence of alternative methods that have been specifically validated for



NMs, the SCCS also takes into consideration such methods that may have not yet undergone formal validation but can be demonstrated to be scientifically valid.

Validated replacement methods are methods that have passed the various steps of the modular validation process established at EURL-ECVAM, and are considered by its Scientific Advisory Committee (ESAC) to comply with the process. Equally so, methods considered by EURL-ECVAM of having the status equivalent to validation, or alternative methods accepted by OECD, are in the EU recognised as validated methods. At present, various *in vitro* guidelines are being adapted and validated to accommodate NMs at OECD level as well as in other initiatives such as the Malta project (e.g. citations in Shatkin and Ong, 2016). In addition, the international organization for standardization (ISO TC 229) has been developing guidelines for NMs. As discussed before, the suitability of *in vitro* methods for NMs can be affected by specific nano-related properties due to e.g. aggregation/agglomeration and subsequent sedimentation, floating and other changes. Furthermore, as already stated in section 5.3.2 and 5.3.6, it is well known that NMs might interfere with commonly used assays by influencing readout parameters such as absorbance or fluorescence (see overview in Guadagnini *et al.*, 2015 or ECHA, 2017b). As a consequence, the outcome of an *in vitro* assay for NMs is often difficult to interpret. Work is ongoing to develop suitable protocols, for dispersion, analysis of cellular doses and quality criteria for nanoparticles (Gottardo *et al.*, 2017).

Recently OECD (OECD, 2016c) published a state of the art report on 'alternative testing strategies in risk assessment of manufactured NMs (ENV/JM/MONO (2016)63) and concluded: while stand-alone alternative testing methods may contribute to basic mechanistic or toxicity knowledge, they will not be sufficient for use in quantitative risk assessment; rather, a battery of alternative testing methods will likely be used in a Weight-of-Evidence (WoE) approach (e.g., Nel *et al.*, 2013). Strategically incorporating multiple alternative testing methods into alternative testing strategies will allow for an understanding of human and environmental behaviour and toxicity of NMs across endpoints, receptors and material groups.

Among other issues, the report highlighted the following:

- Research must ensure that alternative tests are representative of *in vivo* eukaryotic conditions; for example, the OECD recently concluded that the commonly used Ames test, a bacterial mutagenicity assay, may not be suitable for detecting potential human genotoxicity induced by manufactured NMs because of the lack of endocytosis and limited NM diffusion across the bacterial cell wall (OECD, 2014b).
- *In vitro* models are becoming increasingly sophisticated and better at simulating human-relevant conditions (e.g. 3D cell co-cultures and (micro)fluidic models) (Rothen-Rutishauser *et al.*, 2005; Kostadinova *et al.*, 2013; Astashkina and Grainger, 2014; Roth and Singer, 2014; Chortarea *et al.*, 2015; Horváth *et al.*, 2015).
- A lack of availability of quality data that can address the issues related to categorisation and grouping of NMs based on their physicochemical properties, mode of action or relevant exposure also hinders the development of *in silico* methods (Tantra *et al.*, 2015).



- Existing data can be harnessed to develop an adverse outcome pathway (AOP), which starts from a molecular initiating event (MIE), which links to key events (KEs) at different levels of biological organisation (e.g., cellular or organ response), eventually leading to an adverse outcome at an organism or population level (Ankley *et al.*, 2010; OECD, 2013). It has become clear that direct correlations between the physicochemical properties of a single NM and *in vivo* outcomes are not possible; AOPs instead focus on groupings based on both the chemical activity and the consequent biological processes (OECD, 2013).

In the absence of *in vivo* and other information on a cosmetic ingredient in nano-form, the following elements should be considered in safety evaluation: chemical structure, physicochemical properties, non-testing information (read across, *in silico* modelling, PBPK modelling) and information from *in vitro* and other alternative methods.

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Currently, there is no stand-alone *in vitro* or *ex vivo* test to replace a standardised *in vivo* method for toxicological assessment of NMs. A tiered approach based on non-testing and *in vitro* methods has therefore been proposed that involves physicochemical characterisation, *in vitro* screening tests including '-omics', and the use of non-testing approaches (*in silico* models, read across). The current state-of-the-art on 'alternative testing strategies in risk assessment of manufactured nanomaterials is published by the OECD (OECD, 2016c). For cosmetic purposes, only data from validated replacement methods are accepted. However, in the absence of alternative methods that have been specifically validated for NMs, the SCCS also takes into consideration such methods that are not yet formally validated but can be demonstrated to be scientifically valid.

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#### **5.4.1 *In silico* modelling, grouping and read-across**

Depending on the need for different end-uses, nano-forms of a cosmetic ingredient may be developed in many different particle sizes/shapes, crystalline forms, surface modifications/coatings, etc. Often adequate data on physicochemical and/or toxicological characterisation for each variant of the given NM are not available. This poses a major difficulty for safety assessment because the lack of data only allows case-by-case assessment of each individual variant of the NM. To address the problem, a number of publications have highlighted the need for data and tools for robust and reliable *in silico* modelling and grouping/read-across for NMs (e.g. National Research Council, 2012; Tantra *et al.*, 2015; Oksel *et al.*, 2015; Walser and Studer, 2015). Different proposals have also been made outlining frameworks for the use of *in silico* methods and grouping/read-across for NMs (Arts *et al.*, 2014, 2015, 2016; Landsiedel 2014; ECHA/JRC/RIVM, 2016; OECD, 2016a,b; Oomen *et al.*, 2015; ECHA, 2017a;). However, whilst *in silico* modelling tools and read-across approaches have advanced a lot in the past few decades for estimating the toxicity of conventional chemical substances, they are still at an elementary stage for NMs. In addition, there is an enormous database on chemical substances, accumulated over more than a century, which provides a basis for deriving the rules and algorithms that define relationship(s) between a chemical structure and biological activity. For NMs, such a database is still poor and patchy. Therefore, for NMs the relationships between physicochemical aspects and toxicological effects have not yet been established adequately to allow the development of reliable and robust *in silico* models. A handful of models are

currently available for NMs (Toropov *et al.*, 2006; 2007a; 2007b; 2008; Sayes and Ivanov, 2010; Burello and Worth, 2011) but most of them are based on a few physicochemical parameters and limited toxicological datasets, and their reliability and applicability to NMs has not yet undergone any rigorous testing/validation. Further developments in this field may lead to *in silico* models in the future as a means for deriving reliable toxicological estimates for safety assessment of NMs.

A reference paper by ECHA, JRC and RIVM (2016), which has resulted in recommendations for NMs applicable to the Guidance on QSARs and Grouping of Chemicals (ECHA, 2017a), has proposed an outline for grouping and read-across of NMs on the basis of physicochemical properties, toxicokinetic considerations, and hazard considerations. The use of such methods would need to be scientifically justified and on a case-by-case basis (ECHA, 2017a; Gottardo *et al.*, 2017). In consideration of the current major data gaps, it is likely that experimental data would be needed in most cases to substantiate and justify the use of a grouping/read-across approach for NMs.

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The *in silico* modelling tools and read-across approaches are still at an elementary stage for NMs. A reference paper by ECHA, JRC and RIVM (2016) has proposed an outline for grouping and read-across of NMs based on physicochemical properties, toxicokinetic considerations, and hazard considerations. The use of such methods would need to be justified on strong scientific grounds on a case-by-case basis.

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#### **5.4.2 *In vitro* and other non-animal methods**

##### **Assessment of overt toxicity and local effects of the port of entry including genotoxicity**

The test design needs to be oriented on the relevant exposure scenario (oral, dermal, inhalation) using adequate (context-specific) doses. In the first instance, *in vitro* testing can be targeted to assess overt toxicity that might be exerted even at the port of entry (e.g. cytotoxicity, production of ROS, inflammation, cytokine induction, genotoxicity). Such tests might also be able to give an insight to possible mechanisms of toxicity. Assays determining cytotoxicity might reveal damage of the plasma membrane, mitochondria or lysosomes. As NMs have been shown to interfere with certain *in vitro* assays or read-out systems, it has been recommended to use more than one assay for one specific endpoint/parameter to circumvent any limitations of the individual assay (Shatkin and Ong, 2016; OECD, 2017a). In addition, each assay should include appropriate controls to identify (background) interference of the NMs within the assay. An overview on possible assays for determination of basic cytotoxicity *in vitro* (i.e. on cell viability, production of reactive oxygen and nitrogen species, inflammatory response and cytokine induction) is given in Annex 1.

For the assessment of local damage to the skin (skin corrosivity and skin irritation) and the eyes (serious eye damage and eye irritation), a variety of non-animal methods is available that might be used for NMs if nano-specific aspects are taken into consideration (see Annex 1).

Information on *in vitro* assessment of genotoxicity and mutagenicity is given in section 5.3.6 and also in Annex 1.

The mechanisms involved in skin sensitisation have been described by the OECD in the AOP Covalent Protein binding leading to Skin Sensitisation (OECD, 2012b; <https://aopwiki.org/wiki/index.php/Aop:40>). The molecular initiating event (MIE) of this AOP is covalent binding of the chemical to skin proteins, leading to an immunogenic hapten-carrier complex. The MIE triggers KE2, keratinocyte activation, and KE3, dendritic cell activation. Subsequently, the activated and differentiated dendritic cells migrate to the draining lymph nodes and present their small peptides of the hapten-carrier complex to the T cells. This leads to KE4: T cell activation and proliferation creating a pool of memory T cells, ultimately leading to skin sensitisation (adverse outcome). For these key events, *in vitro* assays have been validated for conventional chemicals (see Annex 1).

### **Potential for systemic uptake via the relevant uptake route(s)**

Next step to determining local toxicity should be to assess whether an NM is taken up systemically via the uptake route of interest. Investigation of the solubility behaviour in adequate biofluid might give information whether and to what extent an NM remains intact in a particle form, for example after oral and/or systemic uptake. The assessment of potential systemic uptake should also consider any changes in the physicochemical properties of the NM.

*In vitro* models that simulate different biological barriers have also been developed to determine absorption via different uptake routes. These include *in vitro* models simulating the gastrointestinal, pulmonary or oral mucosal barrier (overviews in Dekkers *et al.*, 2016 and Gottardo *et al.*, 2017). A validated OECD test guideline exists for determining dermal uptake (OECD, 2004a). However, such *in vitro* models have not yet been validated for NMs. As mentioned before, unlike the diffusion gradient driven absorption of conventional chemicals, the translocation of NPs across biological membranes involves endocytosis and/or active transcellular transport mechanisms. In addition to *in vitro* methods, *ex-vivo* methods might also provide some insight to the uptake of NMs.

### **Local Effects**

Studies showed that several NPs (e.g. ZnO, Ag, TiO<sub>2</sub>, and CeO<sub>2</sub> NPs) do not lead to local irritation after evaluation in a reconstructed human epidermis (RhE) model (Kim *et al.*, 2016; Vinardell, *et al.* 2017; Miyani and Hughes, 2017). In this model the NMs can be applied in both a watery and lipid solution on top of the epidermal construct that has similar tissue layers as normal human skin. As of June 2019, six RhE models were validated and accepted for determination of *in vitro* skin irritation of chemicals in OECD TG 439 (OECD, 2019a).

### **Systemic effects**

If there is potential for systemic uptake of the NM, systemic toxicity has to be investigated. In the absence of a recourse to *in vivo* testing, it is very difficult to predict the distribution of NMs in the human body. However, based on past experience with *in vivo* models, it can be assumed that poorly-soluble systemically available NMs are mainly distributed to tissues that are rich in phagocytic cells belonging to the mononuclear phagocytic system (MPS),

e.g. liver and spleen (Dekkers *et al.*, 2016; OECD, 2016d; ISO/TR 22019). In addition, *in vitro* barrier models e.g. on blood-brain or placental barrier might give further insight to the distribution of systemically available NMs.

For *in vitro* tests addressing systemic effects, kinetic aspects (e.g. absorption via the relevant uptake route, dissolution rate in relevant body fluids, protein binding and protein corona formation, distribution) should be taken into consideration to enable *in vitro* to *in vivo* extrapolation (IVIVE).

For the investigation of systemic effects in tissues, 3D cell co-culture models and microfluidic models have been described (see Dekkers *et al.*, 2016). In addition, *ex-vivo* models and methods, such as precision-cut lung slices, might enable further understanding of the systemic toxicity of NMs. However, the latter are still in early phases of development.

Two Guidance documents (OECD Guidance Documents No. 214 and 231) have recently been adopted on the CTA that provide partial information on the multi-step processes that lead to cancer (OECD, 2015a, OECD, 2016f). The assay has already been applied to a variety of NMs (Gabelova *et al.*, 2017; see also section 5.3.6).

In summary, a number of standalone alternative testing methods may contribute to basic mechanistic or toxicity knowledge, but they will not be sufficient for use in quantitative risk assessment. Instead, the use of a battery of alternative testing methods will be more useful in a WoE approach (Nel *et al.*, 2013; OECD, 2016c; EFSA, 2017; SCHEER, 2018). Strategically incorporating multiple alternative testing methods into alternative testing scheme will allow for an understanding of the behaviour and toxicity of NMs across human and environmental endpoints, receptors and material groups.

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This Guidance provides a list of non-animal methods that could be used for NMs while taking nano-specific aspects into consideration (Table in the Annex 1). The test design needs to be oriented on the relevant exposure scenario (oral, dermal, inhalation) using adequate context-specific doses. In the first instance, *in vitro* testing can be targeted to assess overt toxicity that might be exerted even at the port of entry (e.g. cytotoxicity, production of ROS, inflammation, cytokine induction, local genotoxicity). It is recommended to use more than one assay for one specific endpoint/parameter to circumvent any limitations of the individual assay, with appropriate controls to identify (background) interference of the NMs in the assay. The assessment of potential systemic uptake should also consider any changes in the physicochemical properties of the NM. Investigation of the solubility behaviour in relevant biofluids might give information whether and to what extent an NM may remain intact in particle form for example after oral and/or systemic uptake.

If there is a potential for systemic uptake of the NM, systemic toxicity will need to be investigated. For *in vitro* tests addressing systemic effects, kinetic aspects (e.g. absorption via the relevant uptake route, dissolution rate in relevant body fluids, protein binding and protein corona formation, distribution) should be taken into consideration to enable *in vitro* to *in vivo* extrapolation (IVIVE). For the investigation of systemic effects in tissues, 3D cell co-culture models and microfluidic models have been described, and the use of *ex-vivo* models may provide further understanding of the systemic toxicity of NMs. In this regard,

the use of a battery of alternative testing methods will be more useful when results are used together in a WoE approach.

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## 6. RISK ASSESSMENT

Safety assessment of NMs follows a similar procedure to that for conventional chemical ingredients. The safety of an NM in a cosmetic application is assessed by considering exposure and toxicological effects. These include local effects as well as systemic effects where there is systemic uptake via the relevant exposure route.

Historically, safety assessment of a cosmetic ingredient has been based on a measured toxicological point of departure (POD) in terms of BMDL or NOAEL from in vivo animal studies, along with an estimate of the internal exposure in terms of systemic exposure dose (SED). The latter is usually derived from the dermal route (e.g. from the intended daily application of a cosmetic ingredient on the skin). The calculation of the SED is described in section 3-3.5.4 of SCCS/1602/18.

For systemic, threshold effects, the Margin of Safety (MoS) of ingredients in a finished cosmetic product is calculated, which is the ratio between a systemic POD (POD<sub>sys</sub>) and an estimate of the exposure.

MoS = POD<sub>sys</sub> / SED (systemic exposure dose)

Where POD<sub>sys</sub> is a Benchmark Dose Lower Limit (BMDL) or, alternatively, a NOAEL or a LOAEL, if BMDL cannot be calculated. The POD<sub>sys</sub> is calculated from the external POD by use of the proportion of the substance systemically absorbed (SCCS Notes of Guidance, SCCS/1602/18 or most recent update).

In the past, a systemic toxicological point of departure (POD<sub>sys</sub>) for use in safety assessment was derived from animal studies. After the ban on animal testing under Cosmetic Regulation, this is not possible for a new cosmetic ingredient, and such data can only be accepted if studies had been carried out prior to the animal testing bans (i.e. before March 2009 or March 2013 depending on the toxicological endpoint), or the data were generated to meet a different regulatory requirement (i.e. for a non-cosmetic use). This means that, whilst it may be possible to calculate an acceptable risk in relation to local effects, this may not be possible for systemic effects due to the absence of data to derive POD<sub>sys</sub> for a new cosmetic ingredient. For such cases, the Applicant will need to assemble the relevant information/data from different NAMs, and integrate the data to build an overall WoE to support demonstration of the safety of the cosmetic ingredient. Because of the current lack of standardised frameworks for a generalised approach for safety assessment to be based entirely on data from alternative methods, this will need to be carried out on a case-by-case basis. Frameworks for assembling the WoE for scientific assessments has recently been published by the European Food Safety Authority (EFSA, 2017) and SCHEER, 2018 that can provide guidance in this regard.

In general, a substance for which MoS is  $\geq 100$  is considered to pose a negligible risk to human health. Depending on the quality and relevance of the available datasets, additional safety factors may, however, be used (e.g. when using LO(A)EL instead of NO(A)EL, or

when specific toxicological information, e.g. on certain endpoints, is missing). It needs to be noted that the assessment factor of 100 (plus any additional uncertainty factor if appropriate) has been developed for conventional ingredients and not specifically for NMs (SCCS Notes of Guidance, SCCS/1602/18 or most recent update). However, this assessment factor has been considered adequate to address aspects of extrapolation and uncertainty and therefore is at present considered to be also applicable and appropriate for NMs (REACH RIP-oN 3, ECHA, 2012).

As stated in the SCCS Notes of Guidance for the testing of cosmetic ingredients and their safety evaluation (SCCS 1602/18), the systemic availability of a cosmetic ingredient is estimated by taking into account the daily amount of a finished cosmetic product applied, the frequency of application, the concentration and systemic absorption of the ingredient, and a mean value for human body weight. As such, the amount of ingredient per kg body weight that would become available daily in the human circulatory system is calculated.

For conventional cosmetic ingredients, in the majority of MoS calculations, the dermal exposure is compared to an oral POD (route to route extrapolation). The oral POD usually corresponds to an amount that has been administered orally, though this may not necessarily be the actual systemically available amount. In many calculations of the MoS for conventional substances, where oral absorption data were not available, the oral bioavailability of a substance had been assumed to be 100%. However, in view of the generally low oral absorption of substances evaluated so far, the SCCS has considered it more appropriate to assume that not more than 50% of an orally-administered dose becomes systemically available (see also section 4.4.2.3 and SCCS 1602/18). Although this value of 50% is an arbitrary choice, it recognises that the GI tract is designed to favour the absorption of ingested substances into the body but that, in most cases, not all of the ingested material will be bioavailable. Thus, in the absence of measured data, the assumption can be made that the effects seen following oral administration have been caused by a fraction of the administered dose, and not the entire dose. Furthermore, if there is evidence to suggest poor oral bioavailability, for example, of a poorly-soluble particulate substance, it may be more appropriate to assume that only 10% of the administered dose is systemically available (IGHRC, 2006). Therefore, any available oral absorption data should be included in the calculations (e.g. SCCP/0851/05). In the case of oral-to-inhalation extrapolation, it was proposed that, in the absence of route-specific bioavailability information, a default factor of 2 (i.e. the absorption percentage for the oral route is half that of the inhalation route) might be appropriate. The inclusion of this factor 2 means, for example, that 50% (instead of 100%) absorption is assumed for oral absorption, and 100% for inhalation.

Route-to-route extrapolation, however, requires experimental data on absorption for both dermal and oral exposures. Any route-to-route extrapolation also needs to be performed case-by-case, and based on expert judgment of the scientific information, including the available toxicokinetic information. It can only be performed if data are available on systemic toxicity, the degree of absorption and also possible metabolic transformation.

If safety assessment is to be based mostly (or entirely) on *in vitro* test results, the *in vitro* concentrations have to be related to external *in vivo* doses (*in vitro*- *in vivo* extrapolation (IVIVE) as the *in vitro* assays do not take into account the kinetics inside the body. Thus, *in vitro* test results must be complemented with kinetic data.



Extrapolation of *in vitro* to *in vivo* (IVIVE) for toxicokinetic assessment is still under development; even if some methods and guidance exist (e.g. orally bioavailable fraction of the dose can be predicted by informatics tool, dermal absorption can be predicted by *in vitro* studies), it should be noted that cellular studies alone cannot mimic the entire organism. For NMs used as cosmetic ingredients, IVIVE is a challenge because; 1) animal *in vivo* data cannot be used to establish and validate toxicokinetic models, and 2) in addition to conventional chemicals, further aspects as stated elsewhere in this document have to be considered for NMs (e.g. aggregation/agglomeration, surface interaction, altered kinetics).

Sparse but relevant nano-specific kinetic data may already be available in various databases from the JRC, US EPA, pharmaceutical industry, but most of these are from pilot projects. ISO/TR 22019:2019 provides an overview of the current knowledge on (toxico)kinetics of NMs indicating that most systemically available NMs end up in organs of the MPS (mononuclear phagocytic system) notably liver and spleen. However more studies and *in silico* modelling are needed for a realistic estimation of the biokinetics of an NM.

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Safety assessment of NMs is carried out in the same way as for conventional chemical ingredients in terms of consideration of the exposure and toxicological effects. For systemic effects, the Margin of Safety (MoS) of ingredients in a finished cosmetic product is calculated, which is the ratio between a systemic point of departure (POD<sub>sys</sub>) and an estimate of the exposure.

$$\text{MoS} = \text{POD}_{\text{sys}} / \text{SED (systemic exposure dose)}$$

Historically the toxicological point of departure (POD) has been measured in terms of NOAEL, along with an estimate of the internal exposure in terms of systemic exposure dose (SED). In cases where *in vivo* data, compliant with the provisions of Cosmetic Regulation, are available on repeated dose toxicity, the margin of safety (MoS) can be calculated as a ratio of a POD<sub>sys</sub> and SED. POD<sub>sys</sub> is BMDL or, alternatively, NOAEL or LOAEL, where BMDL cannot be calculated. For such cases, a substance for which MoS is  $\geq 100$  is considered to pose a negligible risk to human health. Depending on the quality and relevance of the available datasets, additional safety factors may also be used (e.g when using LO(A)EL instead of NO(A)EL, or when specific toxicological information is missing). Although the assessment factors have been developed for conventional ingredients, they have been considered adequate to address aspects of extrapolation and uncertainty, and therefore also applicable to nanomaterials.

With the EU ban on animal testing of cosmetic ingredients/products, derivation of POD<sub>sys</sub> for systemic adverse effects of a new cosmetic ingredient may not be possible. For such cases, the Applicant will need to assemble the relevant information/data from alternative (non-animal) methods, and integrate the data to build an overall weight of evidence (WoE) to support safety of the cosmetic ingredient. Because of the current lack of standardised frameworks for a generalised approach for safety assessment to be based entirely on data from alternative methods, this will need to be carried out on a case-by-case basis. A framework for assembling WoE for scientific assessments published by the European Food



Safety Authority (EFSA, 2017) and SCHEER (SCHEER, 2018) may provide guidance in this regard (EFSA, 2017).

If risk assessment is to be based mostly (or entirely) on *in vitro* test results, extrapolation of *in vitro* to *in vivo* (IVIVE) data will be required. The *in vitro* test results must be complemented with kinetic data that can be derived from nano-specific kinetic models to enable IVIVE. This approach is valid for non-nano (chemical) substances, and should also be valid for nanomaterials.

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## 7. SUMMARY AND CONCLUSIONS

The use of NMs as cosmetic ingredients requires thorough safety evaluation because of the potential for size-related changes in physicochemical properties, biokinetic behaviour, and/or toxicological effects of materials at the nano-scale. Exposure to NMs through the use of cosmetic products may pose a risk of harmful effects from insoluble and persistent nanoparticles that may reach unintended sites in the body and interact with biological entities close to the molecular level.

This Guidance is an up-to-date revision of the existing Guidance (SCCS/1484/12) on safety assessment of NMs in cosmetic products. It covers the main elements of safety assessment, i.e. general considerations (section 2), material characterisation (section 3), exposure assessment (section 4), hazard identification and dose-response characterisation (section 5), and risk assessment (section 6). Due to the evolving nature of NM safety research, the guidance may be revised in the future to take account of any new scientific knowledge. The key recommendations for safety assessment of NMs intended for use in cosmetics are summarised below:

**Definition:** The regulatory definition of NM is provided in the Cosmetic Regulation (EC) No 1223/2009, under Article 2 (1) (k). It is further advisable that, when assessing the safety of a material consisting of small particles, Applicants should also take into account the Commission Recommendation (2011/696/EU) (see section 2.1). Material specifications such as particle size distribution, solubility, and persistence should provide a basis for deciding whether or not a cosmetic ingredient has to be considered an NM. In situations where a particulate material has internal nano-structures, or exists as larger agglomerates or aggregates, the use of volume specific surface area (VSSA) for powders, and/or other parameters, such as imaging by EM, may provide further clarity. Where a new or an already-approved cosmetic ingredient fulfils the criteria for defining it as NM, it will be subject to safety assessment based on the data relevant to nano-scale properties.

**Material characterisation:** In view of the potential changes in properties, behaviour, and effects of NMs, unambiguous identification and detailed characterisation of NMs is an essential requirement for safety assessment. The characterisation data must provide information on the identity of the material(s) in accordance with Cosmetics Regulation (EC) No 1223/2009, Article 16 a) 'identification of the NM...'. As a minimum, characterisation data must be provided on all the parameters listed in Table 2 that are relevant to a given NM. The information should correspond to Cosmetics Regulation (EC) No 1223/2009, Article

16 b) 'specification of the NM...'. It is important that the measurements are carried out using generally accepted techniques in consideration of nano-aspects, and detailed documentation is provided. Particle size being the common denominator for all NMs, must be measured by more than one method - one of which should be EM (preferably high resolution TEM). The NM characterisation needs to be carried out at the raw material stage, in the cosmetic formulation, and during exposure for toxicological evaluations. A detailed description of the production processes, any surface modifications, and the preparatory steps carried out for integrating the NMs in the final cosmetic products may be asked for by the SCCS as input into the safety assessment process.

Exposure Assessment: Safety assessment of NMs follows the same procedure as for non-nano ingredients, but with special considerations of the nano-aspects. Safety assessment of NMs may, in the first instance, be driven by considerations of exposure (Figure 1). For this, the likelihood and extent of local and systemic exposure will need to be estimated or determined in relation to dermal, oral and inhalation exposure routes. The focus should be on determining the potential translocation of NPs across skin, lung, or gastrointestinal barriers (as appropriate) whilst mimicking the actual use scenarios. The SCCS is of the view that the method for calculating dermal and oral exposure to NMs (detailed in SCCS/1602/18 and Section 5) will not be substantially different from the calculation of exposure to conventional cosmetic ingredients. Calculation of exposure to aerosols containing NM may however be more challenging.

Potential systemic exposure can be estimated for the dermal route through analysis of the receptor fluid for NPs in *in vitro* dermal absorption studies and, for all possible uptake routes and where available, through analysis of the data on occurrence in organs and/or blood from toxicokinetic or toxicological investigations. The methods used for this purpose, however, need to be mainstream, state of the art, and the limit of detection low enough to demonstrate the lack of systemic exposure.

ADME parameters should be investigated to determine the extent of systemic exposure via the relevant uptake route, to determine the fate and behaviour of the NM (*in vitro*, *ex vivo*, or IVIVE) and to identify the likely target organs.

Where experimental evidence shows a lack of systemic exposure following application of an NM containing cosmetic product, local exposure and local adverse effects should be investigated. Where systemic exposure is indicated by chemical analysis, further investigations (e.g. by EM) should be carried out to confirm whether the absorbed material was in particle form or in a solubilised/metabolised form. The method for calculating dermal and oral exposure to cosmetic ingredients are provided in the SCCS Notes of Guidance (SCCS/1602/18 or its most recent version) and are specified for NMs in Section 4 of this Guidance. It is very important to characterise NMs under exposure conditions to ascertain that characteristics have not changed when used in the finished cosmetic product.

For those conventional cosmetic ingredients for which no (adequate) information is available on dermal absorption, the SCCS assumes 50% absorption based on literature analysis for conventional substances. It is acknowledged that this value has not been derived for NPs and that very limited or no dermal absorption has so far been demonstrated for NMs. However, the SCCS is aware of specific surface modifications of NMs that may stimulate dermal penetration. In view of this, dermal absorption of NMs will need to be determined experimentally (see Annex 2). Where no experimental data are provided, the SCCS will

apply the default value of 50% of the administered dose for dermal absorption as determined for conventional substances, or higher if warranted by the composition of a specific NM. Calculation of inhalation exposure to NM containing aerosols is more challenging and will need determining the generated droplet size distribution as well as size distribution of the dried residual aerosol particles. For the lung the SCCS considers 100% of the lung deposited dose as the default absorption amount. For oral exposure the SCCS assumes a 50% of the administered dose for NP absorption, similar to conventional cosmetic ingredients, and 10% if poor oral bioavailability can be demonstrated.

Concerning the amount of absorbed particles when there is no data on the particle nature of the absorbed NM (e.g. by solubility/ degradation data of the NM), the SCCS will apply a default assumption that **100%** of the absorbed material is in particle form.

Hazard identification/dose response characterisation: Data from toxicological studies for local and – in case of systemic absorption- systemic effects will be required (as per SCCS Notes of Guidance (SCCS/1602/18 or its most recent version and Annex 2). Testing of NMs for hazard identification/ dose response characterisation must be carried out in consideration of the nano-related aspects. These include consideration of insoluble or partially-soluble particulate forms, aggregation and agglomeration behaviour of the particles, potential penetration of NPs through biological membranes, possible interaction with biological entities at local and systemic levels, surface adsorption/ binding of other substances, surface catalysed reactions, persistence, etc. Testing conditions used should also be documented in the dossier.

The prohibition on animal testing and marketing of animal tested cosmetic ingredient/products under Cosmetics Regulation (EC) No 1223/2009 must be observed in any toxicological testing. In this regard, the SCCS takes into account any toxicological data derived from alternative means, such as *in vitro* and *ex vivo* methods, *in silico* models, grouping and read-across, physiologically-based pharmacokinetics (PBPK) or toxicokinetics (PBTk) modelling (SCCS Notes of Guidance SCCS/1602/18, or most recent version). Since validated alternative methods that can be used in place of animal tests are not yet available for NMs, the SCCS can accept results from the methods that may not have been formally validated for NMs, but can be demonstrated to be scientifically valid for hazard identification of NMs, provided that they are carried out with due consideration of the nano-related aspects and appropriate controls. In such cases, characterisation of NMs during the tests will be needed as an essential part of the evidence to ensure validity of the results. The *in silico* modelling tools and read-across approaches are currently at an elementary stage for NMs and the use of such methods would need justifying on strong scientific grounds on a case-by-case basis.

For *in vitro* genotoxicity assessment, both chromosomal damage (clastogenicity and aneugenicity) and gene mutations should be evaluated. The widely used bacterial reverse mutation (Ames) test is not considered appropriate for NM mutagenicity assessment and an *in vitro* mammalian cell gene mutation test should instead be carried out. Other indicator tests should also be considered, such as the Comet assay modified with repair enzymes, and the cell transformation assay (CTA). It is imperative that assessment of cellular and if possible nuclear uptake is also carried out to demonstrate target exposure during the *in vitro* genotoxicity studies.

Safety Assessment: Historically, calculation of margin of safety (MoS) of a cosmetic ingredient has been based on a measured toxicological point of departure (POD), along with an estimate of internal exposure in terms of systemic exposure dose (SED). With the EU ban on animal testing of cosmetic ingredients/products, derivation of POD<sub>sys</sub> for systemic adverse effects of a new cosmetic ingredient may not be possible, or only possible in exceptional cases. However, data obtained to comply with other non-cosmetic regulations should be used and submitted when available. For other cases, the Applicant will need to assemble relevant information/data from different alternative (non-animal) methods, and integrate the data to build an overall weight of evidence to support safety of the cosmetic ingredient. Because of the current lack of standardised frameworks for a generalised approach for safety assessment to be based entirely on data from alternative methods, this will need to be carried out on a case-by-case basis.

Where safety assessment is to be based mostly or entirely on *in vitro* test results, extrapolation of *in vitro* to *in vivo* (IVIVE) data will be required. The *in vitro* test results must be complemented with kinetic data that may be derived from nano-specific kinetic models to enable IVIVE.

Where data have been derived from validated tests, or from relevant and justified tests, and uncertainties are not high, there are no scientific reasons for applying additional margins of safety to an NM than a conventional material. However, where this is not the case, and data provided are either insufficient or from inadequate tests, the risk assessor may consider applying additional uncertainty factors for safety assessment.

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## **ANNEXES**

### **ANNEX 1: Available replacement methods for the toxicological evaluation of nanomaterials intended for use in cosmetics**

<p>The hazard endpoints listed below should be provided for nano-ingredients used in cosmetics. These endpoints are similar to those generally required for non-nano cosmetic ingredients. As the validated NAMS available for non-nano cosmetic ingredients are described in the 10<sup>th</sup> Revision of the SCCS Notes of Guidance (SCCS/1602/18), the different NAMS are only summed up here. For more details, refer to SCCS/1602/18. It should be noted that none of the NAMS have been validated for nanomaterials</p>	
Endpoint	Nano-related considerations
<p><b>Cytotoxicity</b></p> <p>Cytotoxicity testing is concerned with cell death evaluation as well as physiological and biochemical changes leading to cell mortality or to cell cycle arrest. An experimental approach can include basic cellular morphology visualisation or more elaborated assessments (metabolic activity, ATP content, membrane integrity/ permeability,...). The cell cultures used can be sophisticated and consist of multiple cell types.</p> <p>General classification of basic cytotoxicity assays based upon:</p> <p>(i) cell viability:</p> <ol style="list-style-type: none"> <li>1) structural cell damage leading to membrane damage/leakage or cell death</li> <li>2) cell growth</li> <li>3) cellular metabolism</li> </ol>	<p>None of these tests have been validated specifically for NMs, but may still be valuable for hazard identification if nano-related aspects are taken into consideration, e.g.:</p> <ul style="list-style-type: none"> <li>- Solubility/dispersion</li> <li>- Adsorption of substances</li> </ul> <p>When a dispersant is used to disperse an NM in a toxicological test medium, it should be ascertained that it does not modify the physicochemical properties of the NM (including agglomeration or aggregation state and dynamics), and/or does not adsorb on the NM surface and as such affect toxicity. Similarly, consideration should be given to binding of other moieties (such as proteins from serum, dyes, or other media components) on the NM surface as this might alter ADME properties and/or effects, and generate erroneous results.</p> <p>The stability of an NM suspension should ideally be monitored throughout the exposure period as the concentration of the NM to which the test system is being exposed may vary with time (due to agglomeration, precipitation).</p> <p>An adequate number of positive and negative controls should be included in the tests to verify the role of the vehicle. This may also require additional material characterisation in the specific dispersant (e.g. in terms of size, size distribution, point of zero charge, etc). Validated positive control (reference) NMs for apoptosis, cytotoxicity, ROS, etc. are not available yet. In many publications, however, NH<sub>2</sub>-PS NPs (i.e., positively charged amino modified-polystyrene NP) are used as they were shown to be toxic to many different cell types and do not release dissolved ions which may cause toxicity as is the case e.g. for metallic oxide NPs). Exemplary control settings deduced from the cause-and-effect analysis and implemented into a 96-well plate are described by Elliot <i>et al.</i> (2017).</p> <p>NMs can interfere with readout systems. Examples of such specific interference include, but are not limited to the following (Thorne <i>et al.</i>, 2010):</p>

<p>(ii) the type of measurement</p> <p>1) Colorimetric assays (MTT, MTS, XTT, WST1-1, LDH, SRB, NRU and crystal violet assays)</p> <p>2) Dye exclusion assays (trypan blue, eosin, Congo red, erythrosine B assays)</p> <p>3) Fluorometric assays: (Alamar Blue assay, CFDA-AM assay, GF-AFC assay)</p> <p>4) Luminometric assays (ATP assay and real-time viability assay)</p>	<ul style="list-style-type: none"> <li>- (i) Fluorescence/absorbance-based methods: disturbance by NMs that are fluorescent or absorb light at the wavelength of measurement, or that quench fluorescence, or light scattering. Some of these problems might be overcome by either adding appropriate controls or modifying existing protocols, e.g. removal of NMs via centrifugation before reading the assay can reduce data variation (SCENIHR, 2015). Another way is to subtract NM absorbance as background (Ciapellano <i>et al.</i> 2016)</li> <li>- (ii) Luciferase based methods: non-specific activation or inhibition of the luciferase signal that can occur in a concentration-dependent manner.</li> <li>- (iii) Enzymatic assays: alteration of enzyme function, of co-factor, or of other limiting reagents by NM; display of enzymatic activity (or chemical reactivity) by the NM itself; removal of NM before performing the assay may be helpful (Ciapellano <i>et al.</i> 2016).</li> <li>- (iv) Resazurin or MTT reduction: strongly reducing NMs may directly reduce resazurin or 3-(4,5-dimethylthiazol-2-yl)-2,5-diphenyltetrazolium bromide (MTT) non-enzymatically. Compounds that trigger the release of superoxide can trigger reduction of resazurin by superoxide. This may result in erroneous cytotoxicity data.</li> </ul> <p>When NMs are not sufficiently pure, interference with the test may come from impurities or from ingredients of the formulation.</p> <p>In general, NMs are not soluble in the culture media, and therefore it should be ensured that the highest concentrations used do not produce excessive precipitates or hamper visual inspection of the growing cells.</p>
<p>(iii) the mode of action</p> <p>This can be achieved by assessing the ability of NM to:</p> <p>1) produce reactive oxygen and nitrogen species-oxidative stress (by eg.H2DCF-DA assay, TBA assay for malondialdehyde, GSH/GSSG ratio)</p> <p>2) trigger an inflammatory response (by eg. CFU-GM and CFU-E, whole blood cultures, hemolysis test, thrombogenicity assay (activated partial thromboplastin time assay, thrombin generation assay, blood clotting time assay, calibrated thrombin generation assay), phagocytosis assay,</p>	<p>The sterility of the NM suspension has to be assured, as the presence of biological contamination (bacteria, LPS) may induce strong inflammatory reactions in some cell types.</p> <p>For all above reasons, multiple assays for cytotoxicity should be employed in order to reduce false negative/positive results (Drasler <i>et al.</i>, 2017).</p> <p>As there are no commonly accepted and validated methodologies, care should be taken to consider possible interferences and to avoid misinterpretation of data (e.g. Elsbahy and Wooley, 2013). However, at the moment, the colony forming efficacy (CFE) is considered as one of the most promising test for NMs (Dusinska <i>et al.</i>, 2015). The assay could be included in a testing battery as an early screening method. It may well be used in combination with other <i>in vitro</i> assays (e.g. genotoxicity <i>in vitro</i> assays, such as the <i>in vitro</i> micronucleus assay (OECD TG 487 (OECD, 2010e)) to define subtoxic doses <i>in vitro</i>. It has to be noted that this assay cannot be used for cell suspensions or cells not forming colonies (Kinsner-Ovaskainen and Ponti, JRC Report, 2014).</p>

## DC maturation

3) induction of genotoxicity including cell arrest (by eg. Comet assay, micronuclei presence, TUNEL assay)

(Farcas et al. 2015; Drasler et al. 2017; Lewinski et al. 2008; Marrocco et al. 2017).

Available cell culture models:

To measure cytotoxicity different cell models can be used. Besides the use of standard 2D-cell cultures, more advanced culture systems became available such as co-cultures, 3D-cell cultures and multicellular spheroids.

Cells are preferentially of human origin.

- **co-culture:** used to mimic the communication between different cell types e.g. for lung epithelial cells, macrophages, endothelial or dendritic cells may be combined. Co-culture models allow high-throughput testing and in-depth monitoring of effects of xenobiotics on cell-cell interactions. Models have been developed exposing cells to aerosols of ENMs at the air-liquid interphase to accurately mimic the cell-particle interactions occurring in lungs (Paur *et al.*, 2011).

- **3D-cell cultures:** cells are cultured within micro-assembled devices supported by a 3D-structure mimicking the *in vivo* tissue and the organ-specific microarchitecture. 3D-cell co-cultures and (micro)fluidic models are emerging techniques, which create more realistic exposure



<p>conditions by simulating the morphology and physiology of natural tissue (Ozcelikkale <i>et al.</i>, 2017). The most recent advancement in this area is the development of integrated organ-on-chip microsystems that reproduce key structural, functional, biochemical, and mechanical features of living organs in a single device.</p> <p>- <b>multicellular spheroids:</b> many cell types can be grown in spheroids and cells often behave as seen <i>in vivo</i>. These spheroids are composed of a necrotic core with quiescent intermediate and proliferating periphery regions. Such 3D-spheroids offer a simple and highly reproducible model that exhibits many characteristics of natural tissues, such as the production of extracellular matrix and cell-cell interactions.</p>	
<p><b>Acute toxicity:</b></p> <p>Data on acute toxicity is not mandatory. A WoE approach may be sufficient derived from <i>in silico</i>, <i>in vitro</i> and <i>in vivo</i> studies (when available).</p>	
<p><b><u>Skin Corrosivity and irritation</u></b></p> <p><b>Skin corrosion:</b></p> <p>a) Rat Skin Transcutaneous Electrical Resistance (TER) test [OECD TG 430 (OECD 2004b)]</p> <p>b) EpiSkin™ [EC B.40bis, OECD TG 431 (OECD 2004c)]</p> <p>c) EpiDerm™ SCT (EPI-200) [EC B.40bis, OECD TG 431 (OECD 2004c)]</p> <p>d) SkinEthic™ Reconstructed Human Epidermis (RHE) [EC B.40bis, OECD TG 431 (OECD,</p>	<p>The alternative tests proposed for skin corrosion and irritation are based on colorimetric assays (such as sulforhodamine B dye, MTT assay). These techniques may not be suitable for certain NMs because of possible interactions (see endpoint “cytotoxicity” above and section 5.3.2). Thus, additional controls need to be included to avoid possible interference of NMs with the detection system. Some NMs may themselves disperse/absorb light and therefore interfere with colorimetric measurements. These aspects need to be considered when spectrophotometric methods are applied (Guadagnini <i>et al.</i>, 2015; ECHA, 2017b).</p>

<p>2004c)]</p> <p>e) epiCS® (former Epidermal Skin Test-1000) [EC B.40bis, OECD TG 431 (OECD, 2004c)]</p> <p>f) The <i>In Vitro</i> Membrane Barrier Test Method [OECD TG 435 (OECD, 2006)] currently only includes the Corrositex™ test.</p> <p><b>Skin irritation:</b> OECD 439 (OECD, 2019a)</p> <p>a) EpiSkin™</p> <p>b) EpiDerm™ SIT (EPI-200)</p> <p>c) SkinEthic™ RHE</p> <p>d) LabCyte EPI-MODEL24 SIT</p> <p>e) epiCS®</p> <p>f) Skin+®</p> <p>OECD TG 439 (OECD 2019a) is stand-alone replacement test within a WoE approach [EC B.46].</p> <p><b><u>Serious eye damage and eye irritation</u></b></p> <p>-As a first step dermal irritancy or corrosivity data should be considered [OECD TG 404 (OECD, 2002a)], [OECD TG 439 (OECD, 2019a)]</p> <p>-Five <i>in vitro</i> test guidelines are available for serious eye damage testing and/or identification of chemicals not triggering classification for eye irritation or serious eye damage:</p> <p>a) Bovine Cornea Opacity Permeability (BCOP) test method [OECD TG 437:2009a]</p> <p>b) Isolated Chicken Eye (ICE) test method</p>	<p>The measurement of cytokines and chemokines in the test system may provide additional information (e.g. IL-1<math>\alpha</math>, tumour necrosis factor <math>\alpha</math> (TNF-<math>\alpha</math>); IL-8, interferon). However, they may bind/adsorb on NM surfaces, and this may lead to false negative results.</p> <p>In OECD (2018a) it was concluded that amendment of the guideline might be needed in view of application to NMs.</p> <p>A specific protocol for solid substances exists for the BCOP and ICE tests. Solid substances are mostly tested at 20% (w/w) as a suspension in 0.9% sodium chloride (including in some instances a dispersant). Although no specific validation has been performed for NMs, there is no clear scientific basis against the application of these methods for NMs. It should, however, be kept in mind that:</p> <ul style="list-style-type: none"> <li>- NMs can aggregate/agglomerate in the suspension or can adsorb the dispersant (see 5.3.2). These aspects should be verified.</li> <li>- opacity measurements may be affected by the presence of NMs. To allow consistent interpretation of the results, this should be kept in view.</li> <li>- for the methods measuring leakage of fluorescein, possible artefacts due to absorption/adsorption of the fluorescent dye by NMs should be verified, and if present, eliminated.</li> </ul>
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<p>[OECD TG 438:2009b]  c) Short Time Exposure (STE) test method [OECD TG 491 (OECD, 2018b)]  d) Fluorescein Leakage (FL) test [OECD TG 460 (OECD, 2017b)]  e) Reconstructed Human Cornea-like Epithelium (RhCE) test method [OECD TG 492 (OECD, 2019c)]</p>	<p>Other in-house models could also be used if they have been properly validated against the models mentioned above.</p>
<p><b><u>Skin sensitisation:</u></b></p> <p>Validated available tests are:</p> <p><i>In chemico skin sensitisation:</i> The Direct Peptide Reactivity Assay (DPRA) [OECD TG 442C (OECD, 2019b)]</p> <ul style="list-style-type: none"> <li>- The Amino acid Derivative Assay (ADRA) [OECD TG 442C (OECD, 2019b)]</li> </ul> <p><i>In vitro activation of keratinocytes:</i></p> <ul style="list-style-type: none"> <li>- KeratinoSens™ [OECD TG 442D (OECD, 2018c)]</li> <li>- LuSens [OECD TG 442D (OECD, 2018c)]</li> </ul> <p><i>In vitro activation of dendritic cells:</i></p> <ul style="list-style-type: none"> <li>- human Cell Line Activation Test (h-CLAT)[OECD TG 442E (OECD, 2018d)],</li> <li>- U-SENS™ [OECD TG 442E (OECD, 2018d)].</li> <li>- IL-8 Luc Assay [OECD TG 442E (OECD, 2018d)].</li> </ul> <p>These assays cannot be used as stand-alone methods, but should be included in Defined or</p>	<p>The <i>in vitro</i> skin sensitisation methods have not been validated for NMs. Their applicability is therefore limited to soluble test chemicals or substances forming a stable dispersion. The application domain of these tests for NMs still has to be established.</p>

Integrated Approaches for Testing and Assessment (IATA)(OECD, 2016e).	
<p><b>Dermal/ percutaneous absorption:</b></p> <p>Dermal absorption of cosmetic ingredients is usually assessed by the <i>in vitro</i> skin absorption method [OECD TG 428 (OECD, 2004a)]. Guidance on its performance is given [DG SANCO 2004, OECD 2004a, 2011a].</p> <p>A multiplicity of factors play a key role in the determination of the dermal/ percutaneous absorption of a compound and the SCCS considers its own “Basic Criteria” as essential for dermal absorption studies [SCCS 2010a; SCCS/1602/18].</p>	<p>For any tests on NMs, the dose, volume, and contact time with the skin, have to mimic the in-use conditions (also taking the consideration of dispersion – see 5.3.2). Appropriate analytical techniques and sampling methods should be used to determine the possible adsorption of substances on NM surfaces – see 5.3.2).</p> <p>Dermal absorption of NMs needs to be determined experimentally. However, if no experimental data are provided, the SCCS will apply the default value of 50% as determined for conventional substances, or higher if warranted by the composition of a specific NM (see section 4.4.2.1).</p> <p>If case <i>in vitro</i> absorption tests indicate potential systemic absorption, the integrity of the nano structure needs to be confirmed. When absorption of NPs cannot be excluded by experimental data, or justified on the basis of solubility/ degradation of the NM, the SCCS will apply a default approach and assume that 100% of the absorbed material was in nano form</p> <p>The standard <i>in vitro</i> diffusion cell chamber, used for non-nano ingredients, may not be ideal for testing NMs because mechanical factors may interfere. New or optimised methodologies are required (SCCP, 2007). This is in line with OECD (2018a), where it is stated that OECD 428 should be adapted for testing on manufactured NMs. However, several critical points in the protocol may not be adequate for these, including observation time, sampling time, influence of the mechanical process on particles translocation, solubility in and compatibility with the receptor fluid.</p>
<p><b>Repeated dose toxicity:</b></p> <p>Currently no validated or generally accepted alternative method is available to replace animal testing.</p> <p>This endpoint is important as effects, which</p>	<p>Information generated by <i>in vitro</i> testing might be considered within an integrated strategy (i.e. combining different pieces of information) in order to draw conclusions for an NM. Of particular interest are local target organ effects, and/or tests to clarify the mechanisms of action (e.g. cell</p>

<p>require a long latency period or which are cumulative, become manifested in this test.</p>	<p>viability, oxidative stress, inflammation, etc.).</p>
<p><b>Mutagenicity/genotoxicity:</b></p> <p>Base level testing consists of the following <i>in vitro</i> 2-test battery:</p> <ol style="list-style-type: none"> <li>1. Bacterial reverse mutation test [OECD TG 471 (OECD, 1997a)] for gene mutation testing</li> <li>2. <i>In vitro</i> Micronucleus test [OECD TG 487 (OECD, 2010e)] for both structural (clastogenicity) and numerical (aneugenicity) chromosome aberrations testing</li> </ol> <p>Other <i>in vitro</i> genotoxicity test methods:</p> <ul style="list-style-type: none"> <li>– <i>In vitro</i> mammalian cell gene mutation tests using the Hprt and xprt genes [OECD TG 476 (OECD, 1997c)]</li> <li>– <i>In vitro</i> mammalian cell gene mutation tests using the thymidine kinase gene [OECD TG 490 (OECD, 2015c)]</li> <li>– <i>In vitro</i> mammalian chromosome aberration test [OECD TG 473 (OECD, 1997b)]</li> </ul>	<p>The SCCS recommends the following tests for NM genotoxicity testing <i>in vitro</i>:</p> <ul style="list-style-type: none"> <li>• Mammalian cell chromosome aberrations/clastogenicity assay (<i>in vitro</i> chromosome aberration test or <i>in vitro</i> micronucleus test). The micronucleus test can be performed using either the mononucleate or cytokinesis blocked protocols. However, if the cytokinesis blocked micronucleus assay is to be applied then cytochalasin B addition must be post-treatment/exposure (after the NM exposure period) or a delayed-co-treatment protocol which is acceptable if a sufficient NM exposure period has been allowed to enable uptake into the test system cells. Co-exposure to both cytochalasin B and the test NM for the duration of the experiment should be avoided due to possible interference of NMs with cytochalasin B.</li> <li>• An <i>in vitro</i> mammalian cell gene mutation test (e.g. <i>Hprt</i>, <i>Tk</i> or <i>Xprt</i> tests).</li> <li>• Other indicator tests, such as the Comet assay, may be included as further weight of evidence.</li> </ul> <p><i>In vitro</i> genotoxicity studies for nanomaterials should be always accompanied by an assessment of cellular and preferably nuclear uptake to demonstrate target exposure.</p> <p>The bacterial Ames test is not recommended as a representative test for genotoxicity of NMs because, unlike mammalian cells, bacterial cells have limited or no uptake of NMs through endocytosis. The bacterial cell wall hinders uptake and particle internalisation is unlikely to occur to the same extent as observed in mammalian cells. Therefore, the sensitivity of the assay for NM genotoxicity has been questioned. In addition, some NMs have bactericidal activity, making this test not suitable for testing NMs (EFSA, 2011).</p> <p>In addition, the use of a metabolic activation system for NMs is questionable. Although not investigated in detail (Szalay <i>et al.</i>, 2011), most insoluble NMs (e.g. some metals) are not metabolised. Instead, the proteins present in a metabolic activation system may interfere with nanomaterials (Kumar <i>et al.</i>, 2011), alter their bioavailability, and thus reduce the sensitivity of the assay. Notwithstanding this, it should be verified whether some NMs could be metabolised (e.g. organic nanomaterials, some inorganic NMs coated with organic substances or their surface modified with organic functional groups).</p>

Caution is also needed when applying an *in vitro* micronucleus test. Cytochalasin B, often used to inhibit cytokinesis, may inhibit endocytosis and may lead to false negative outcomes when particles are present (Landsiedel *et al.*, 2009). Thus, cytochalasin B needs to be applied after the NMs have been taken up by the cells (usually 2 hr after treatment) (Magdolenova *et al.*, 2012).

For several types of NPs (e.g. titanium dioxide, multi-walled carbon nanotubes), microscopic evaluation of the cytokinesis-blocked proliferation index and micronucleus identification was found to be inappropriate at high testing concentrations due to an overload of agglomerates (Corradi *et al.*, 2011). Although not investigated so far, similar problems may be anticipated for other microscopy-based *in vitro* mutagenicity tests (e.g. chromosome aberration test). Some of the shortcomings of genotoxicity tests for NM testing may be addressed by a weight of evidence approach based on additional alternative methods, including those methods that have not yet been validated. They could be relevant and scientifically-valid, such as a micronucleus test or a Comet assay in reconstructed human skin. These alternatives together with the γH2AX assay will become available in the near future for high throughput screening (HTS) and high content analysis (HCA) (Collins *et al.*, 2016). To add more weight to the evidence, mechanistic information at the molecular level can also be obtained through ‘-omics’ technology (Ates *et al.*, 2018). OECD (2018a) considered the *in vitro* mammalian cell gene mutation tests (OECD TG 476(OECD, 1997c)) as an alternative to the bacterial reverse mutation test, as no specific limitations were observed when testing NMs.

The *in vitro* Comet assay is often used to test genotoxicity of NMs and, although it is an indicative test, it may help elucidating the mechanism of genotoxicity (Dusinska *et al.*, 2015; Collins *et al.*, 2016, El Yamani *et al.*, 2017). Several *in vitro* genotoxicity tests have been tested for potential interference with NMs and recommendations for assay modification have been published (Magdolenova *et al.*, 2012, Karlsson *et al.*, 2015). However, in view of the current limitations of *in vitro* tests and the potential introduction of artefacts with specific types of NMs (see also 5.3.2), the SCCS is of the opinion that with the *in vivo* testing ban for cosmetic ingredients, the safety of potential new cosmetic ingredients may not be adequately assessed until the assays are validated for NMs. This is in line with OECD (2018a) in which it is stated that results from the Comet Assay for environmental chemicals can only provide an indication of potential genotoxicity.

NOTE: OECD is currently working on a ‘Guidance Document on the Adaptation of *In Vitro*

	Mammalian Cell Based Genotoxicity TGs for Testing of Manufactured Nanomaterials'.
<p><b><u>Carcinogenicity:</u></b></p> <p>The decision on the carcinogenic potential of mutagenic or genotoxic substances may be made based on the outcome of <i>in vitro</i> mutagenicity tests. A positive <i>in vitro</i> result in mutagenicity testing is seen as indicative for the carcinogenic potential of substances (SCCS/1602/18).</p> <p>When a structural alert for carcinogenicity is present, or positive results are obtained in an <i>in vitro</i> mutagenicity tests, the following cell tests may be needed:</p> <ul style="list-style-type: none"> <li>-an <i>in vitro</i> Syrian Hamster Embryo (SHE) Transformation Test [OECD Guidance Document 214 (OECD, 2015a)]</li> <li>-an <i>in vitro</i> Bhas 42 assay [OECD Guidance Document 231].</li> </ul> <p>The CTAs are claimed to detect both genotoxic and non-genotoxic carcinogens.</p> <p>In addition, some information on the carcinogenicity potential can be inferred from mechanistic studies, e.g. on cell proliferation, altered gap junction intercellular communication (GJIC) (Spannbrucker et al., 2018), hormone- or other receptor binding, immunosuppressive activity (Huaux, 2018), ability to inhibit or induce apoptosis, or ability to stimulate angiogenesis or the secretion of angiogenesis factors (Medina-Reyes et al., 2019).</p>	<p>There is currently no validated alternative method to test carcinogenicity.</p> <p>The recently adopted guidance for the CTA (see section 5.3.6 and 5.3.7) that measures cell transformation (as one step in the multistep cancer process), has been applied for several NMs (Ponti <i>et al.</i>, 2009; Ohmori <i>et al.</i>, 2013, Gabelova <i>et al.</i>, 2017).</p>



<p><b>Reproductive toxicity:</b></p> <p>No validated alternative method is available. The assessment of reproductive toxicity is complex, and it is expected that the various stages cannot be mimicked using a single alternative method</p> <p>For embryotoxicity, three alternative methods have been validated, but not regulatory accepted. They were not specific enough to show embryotoxicity:</p> <ol style="list-style-type: none"> <li>The Whole Embryo Culture test (WEC)</li> <li>The MicroMass test (MM)</li> <li>The Embryonic Stem cell Test (EST) [ESAC 2001].</li> </ol>	<p>The three alternative methods for embryotoxicity could be applicable to NMs, provided that typical nano-related aspects such as dispersion/ aggregation, absorption, stability and distribution into the tissue are taken into account</p> <p>In the EST for nanosilica, inhibition of differentiation into contracting myocytes has been observed (Park <i>et al.</i>, 2009)</p>
<p><b>Endocrine disruption (ED) activity:</b></p> <p>The assessment of potential ED activity can be done in a stepwise approach using data generated outside the cosmetic field or for a new cosmetic ingredient using NAMs (<i>in silico</i> models including read across, <i>in vitro</i> assays, other mechanistic techniques such as '-omics').</p> <p>The currently available <i>in vitro</i> methods are (JRC 2018):</p> <ul style="list-style-type: none"> <li>Estrogen [OECD TG 493 (OECD, 2015d), US EPA TG OPPTS 890.1250] or androgen receptor binding affinity (US EPA TG OPPTS 890.1150)</li> <li>Estrogen receptor transactivation [OECD TG 455, (OECD, 2015b), US EPA TG OPPTS 890.1300], human cell-based reporter gene assay (ISO 19040-3:2018), yeast estrogen screen (ISO 19040-1, 19040-2:2018)</li> </ul>	<p>None of the methods to detect potential ED activity is currently validated for NMs. However, if carried out with due caution to nano-aspects, these test may provide relevant information.</p>

<ul style="list-style-type: none"> <li>• Androgen receptor transcriptional activation [OECD TG 458 (OECD, 2016g)]</li> <li>• Steroidogenesis <i>in vitro</i> [OECD TG 456 (OECD, 2011a), US EPA TG OPPTS 890.1550]</li> <li>• Aromatase Assay (US EPA TG OPPTS 890.1200)</li> <li>• Thyroid disruption assays (e.g. thyroperoxidase inhibition, transthyretin binding). A project on validation of selected <i>in vitro</i> methods within EU-NETVAL activity is on-going.</li> <li>• Retinoid receptor transactivation assays</li> <li>• Other hormone receptors assays as appropriate</li> <li>• High-Throughput Screens, See OECD GD No. 211 Describing Non-Guideline <i>In Vitro</i>, [OECD 2014c]</li> </ul>	
<p><b><u>Toxicokinetic studies (ADME):</u></b></p> <p>Skin absorption <i>in vitro</i> [OECD TG 428 (OECD, 2004a)].</p>	<p>Following systemic absorption, the distribution and fate of an NM is mainly governed by its chemical nature, particle size, surface characteristics, aggregation state, etc. Special considerations relating to exogenous moieties (<i>e.g.</i> surfactants, serum, or other media components) that may change surface characteristics (see 5.3.2).</p> <p>Potential toxicity of metabolites and degradation products could be a factor of variability, but less important for insoluble NMs. It should, however, be considered when NMs, or their surface coatings, may dissolve or degrade. Therefore, where applicable, <i>in vitro</i> biotransformation studies may be necessary to ascertain the likelihood of adverse effects due to metabolites/ degradation products.</p> <p>OECD TG 417 (OECD, 2010d) is considered inadequate for nanomaterials. There are ongoing initiatives at OECD level addressing Toxicokinetics of nanomaterials. Recently, a technical report has been published by ISO (ISO/TR 22019:2019) describing considerations for performing</p>

	<p>toxicokinetic studies for nanomaterials.</p> <p>An overview of nanoparticle toxicokinetics is recently published by ISO (ISO/TR 22019:2019) Nanotechnologies-Considerations for performing toxicokinetic studies with nanomaterials.</p>
<p><b>Photo-induced toxicity:</b></p> <p><u>1) Photo-toxicity (photo-irritation) and photo-sensitisation (photo-allergy)</u></p> <p>-The 3T3 Neutral Red Uptake Photo-toxicity Test (3T3 NRU PT) is a validated <i>in vitro</i> method [OECD TG 432:2004d].</p> <p>- As a second tier, the biological effects can be further evaluated on a reconstructed human skin model with some barrier properties (Kandarova, 2011).</p> <p><u>2) Photo-mutagenicity / Photo-genotoxicity</u></p> <p>The methods described by the “Gesellschaft für Umweltmutationsforschung” (GUM) Task Force include photo-Ames test, photo HPRT/photo-mouse lymphoma assay, photo-micronucleus test, photo-chromosome aberration test and photo-Comet assay. In many cases, the concurrent use of irradiation, while performing a standard mutagenicity/genotoxicity study, does not significantly alter the existing OECD protocol without irradiation. Therefore, the majority of the</p>	<p>The reliability and relevance of the <i>in vitro</i> 3T3 NRU Test has not been specifically validated for NMs (Spielmann <i>et al.</i> 1998). It should be noted, however, that in some instances neutral red may interfere with NMs (Lanone <i>et al.</i>, 2009; Guadagini <i>et al.</i>, 2015) (also see 5.3.2)</p> <p>The SCCS will take the GUM Task Force results into consideration and will evaluate the individual photomutagenicity/ photogenotoxicity tests and their scientific merits on a case-by-case basis. Also, see comments under mutagenicity/ genotoxicity.</p> <p>Also general recommendations regarding the experimental conduct of tests for photo-genotoxicity (Gocke <i>et al.</i>, 2000), will be followed:</p> <p>- in specific cases when the structure of a molecule, its light absorbing potential or its potential to be photo-activated may indicate photo-mutagenic/photo-genotoxic hazard, then photo-mutagenicity tests should be provided, including gene mutations and clastogenicity/aneugenicity endpoints; especially when the substance is liable to reach the eyes or light-exposed areas of skin, either by direct contact or through systemic distribution. Additionally, available alternative</p>

<p>described photo-mutagenicity/photo-genotoxicity tests are considered as being valid.</p>	<p>methods, for example scientifically validated comet assays for the detection of oxidised DNA lesions, or <i>in silico</i> methods can be considered.</p> <ul style="list-style-type: none"> <li>- UV-VIS spectra of the compound along with Molar Extinction Coefficient (MEC) determined according to harmonised procedure should be provided.</li> <li>- phototoxicity testing should not be performed if absorption wavelengths are below 313 nm and there is insufficient absorption at longer wavelengths.</li> <li>- no photo-mutagenicity tests are needed when phototoxicity tests are negative.</li> <li>- there is no requirement for photomutagenicity testing of compounds with a MEC below 1000 L mol<sup>-1</sup> cm<sup>-1</sup>.</li> </ul>
<p><b>Human data:</b></p> <p>Human data is very valuable. Sources could be: post-marketing surveillance data, results from biomonitoring programs case reports, occupational surveillance data and occupational disease registries, poison centre information, clinical studies, epidemiological studies, tests with human volunteers, etc.</p> <p>Tests with human volunteers confirm that there are no harmful effects, but these can only be envisaged when the toxicological profiles of the components are available and no concern is raised. Finished cosmetic products are usually tested in a small group of human volunteers. Human studies might also become necessary to build up and validate PBPK models.</p>	<p>The same methodology as described for non-NMs are applied, taking into consideration the ethical restrictions as described in the 10<sup>th</sup> Revision of the SCCS Notes of Guidance (SCCS 1602/18).</p>

## **ANNEX 2: Checklist for Hazard Identification (Toxicological Data) to be provided for safety evaluation of nanomaterials intended to be used in cosmetic products**

<b>Information required</b>	<b>Reference</b>	<b>Provided?</b>
Likelihood and extent of internal exposure via skin, lung or oral route considering the use type	Section 3-3.5 of SCCS/1602/18	
Dermal absorption – for dermally applied products	SCCS/1358/10 and section 3-3.5.1 of SCCS/1602/18	
Biokinetic behaviour, aggregation/agglomeration considered during tests?	Section 3-3.5 of SCCS/1602/18	
Acute Toxicity	Section 3-4.4 of SCCS/1602/18	
Irritation and Corrosivity	Section 3-4.5 of SCCS/1602/18	
Skin Sensitisation	Section 3-4.7 of SCCS/1602/18	
Mutagenicity / Genotoxicity <sup>(a)</sup>	Section 3-4.10 of SCCS/1602/18	
Repeated dose toxicity	Section 3-4.8 of SCCS/1602/18	
Photo-induced toxicity - for products intended for use in sunlight-exposed skin	Section 3-4.12 of SCCS/1602/18	
Reproductive Toxicity <sup>(b)</sup>	Section 3-4.9 of SCCS/1602/18	
Carcinogenicity <sup>(c)</sup>	Section 3-4.11 of SCCS/1602/18	
Human data (where available)	Section 3-4.13 of SCCS/1602/18 and SCCNFP/0633/02	
Other relevant information		

<sup>(a)</sup> The Ames test is not considered appropriate for NM mutagenicity assessment. The following scheme based on *in vitro* assays is proposed (SCCS/1602/18).

1. An *in vitro* mammalian cell gene mutation test (e.g. Hprt, Tk or Xprt tests).
2. Mammalian cell chromosome aberration/clastogenicity – determined either by *in vitro* chromosome aberration test or micronucleus test. The micronucleus test can be performed by the mononucleate or cytokinesis blocked protocols. In the cytokinesis blocked micronucleus assay, co-exposure to both cytochalasin B and the test NM for the duration of the experiment is not considered acceptable. Additionally, other alternative tests, such as the Comet assay, may be included as further weight of evidence. New *in vitro* approaches such as cell transformation assays or toxicogenomic approaches may also be useful for identification of genotoxic as well as non-genotoxic carcinogen NMs.
3. *In vitro* genotoxicity studies should be accompanied by an assessment of cellular and nuclear uptake to demonstrate target exposure.

<sup>(b)</sup> Where points 1 and 2 of the above table indicate significant systemic uptake

<sup>(c)</sup> Where points 1 and 2 of the above table indicate significant systemic uptake and/or bioaccumulation



## ABBREVIATIONS AND GLOSSARY OF TERMS

<b>2D</b>	Two-dimensional
<b>3D</b>	Three-dimensional
<b>3R</b>	Refinement, Reduction, Replacement
<b>3T3 NRU PT</b>	3T3 Neutral Red Uptake Phototoxicity Test
<b>AAS</b>	Atomic Absorption Spectroscopy
<b>ADME</b>	Absorption, distribution, metabolism, excretion
<b>Adverse</b>	An adverse response is defined as any treatment-related response that results in change in the morphology, physiology, growth, development or life span of an organism, which results in an impairment of functional capacity, an impairment of the capacity to compensate for additional stress, or an increase in susceptibility to other environmental influences (WHO, 2004).
<b>AFM</b>	Atomic Force Microscopy
<b>AhR</b>	Aryl hydrocarbon receptor
<b>AI</b>	Alveolar Interstitial Region
<b>ALI</b>	Air liquid interphase
<b>Alternative methods</b>	All those procedures which can completely replace the need for animal experiments, which can reduce the number of animals required, or which can reduce the amount of pain and stress to which the animal is subjected in order to meet the essential requirements for use in human or animal risk assessment (Rogiers <i>et al.</i> , 2000; Russell <i>et al.</i> , 1959).
<b>AOP</b>	Adverse outcome pathway
<b>ARE-Nrf2</b>	Antioxidant-responsive element-nuclear factor (erythroid-derived 2)-like 2
<b>Art.</b>	Article
<b>ATP</b>	Adenosine Triphosphate
<b>ATP</b>	Adaptation to Technical and Scientific Progress
<b>BAL</b>	Bronchoalveolar lavage
<b>BB</b>	Bronchial Region
<b>bb</b>	Bronchiolar Region
<b>BCOP</b>	Bovine Corneal Opacity and Permeability
<b>BET</b>	Brunauer Emmett and Teller method
<b>BMD</b>	The Benchmark Dose (BMD) is proposed as an alternative for the classical NOAEL and LOAEL values. The BMD is based on a mathematical model being fitted to the experimental data within the observable range and estimates the dose that causes a low but measurable response (the benchmark response BMR) typically chosen at a 5 or 10% deviation (above or below) of the non treated or control treated animals.
<b>BMDL</b>	The BMD lower limit (BMDL) refers to the corresponding lower limits of a one-sided 95% confidence interval on the BMD.
<b>BrdU</b>	5-bromo-2-deoxy-uridine
<b>CAS n°</b>	Chemical Abstracts Service registry number
<b>CEN</b>	European Committee for Standardization
<b>CFDA-AM</b>	5-Carboxyfluorescein Diacetate, Acetoxymethyl Ester
<b>CLS</b>	Centrifugal Liquid Sedimentation
<b>Colipa</b>	Cosmetics Europe (formerly the European Cosmetic Toiletry and Perfumery Association)

<b>Compatibility test</b>	A test intended to confirm that there are no harmful effects when applying a cosmetic product for the first time to the human skin or mucous membrane; the test must involve exposure (normal or slightly exaggerated) which closely mimics typical consumer use of the product (based on SCCNFP/0068/98).
<b>Cosmetic ingredient</b>	Any chemical substance or mixture of synthetic or natural origin, used in the formulation of cosmetic products. A cosmetic ingredient may be: <ol style="list-style-type: none"> <li>1. a chemically well-defined single substance with a molecular and structural formula,</li> <li>2. a complex mixture, requiring a clear definition and often corresponding to a mixture of substances of unknown or variable composition and biological nature,</li> <li>3. a mixture of 1 and 2, used in the formulation of a finished cosmetic product.</li> </ol> (based on Art. 5a of 93/35/EEC, SCCNFP/0321/00 and 2009/1223/EC).
<b>Cosmetic product</b>	Any substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours (2009/1223/EC).
<b>Cosmetics Europe</b>	The Personal Care Association (formerly Colipa)
<b>CPNP</b>	Cosmetic Products Notification Portal
<b>CTA</b>	Cell Transformation Assay
<b>DC</b>	Dendritic Cell
<b>Da</b>	Dalton
<b>d<sub>ae</sub></b>	Aerodynamic diameter
<b>DC</b>	Dendritic Cell
<b>DG</b>	Directorate-General
<b>DG ENV</b>	Directorate-General for Environment
<b>DG GROW</b>	Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
<b>DG SANTE</b>	Directorate-General Health and Food Safety
<b>Dir.</b>	Directive
<b>DLS</b>	Dynamic Light Scattering
<b>DMA</b>	Differential Mobility Analyzer
<b>DNA</b>	DeoxyriboNucleic Acid
<b>Doc.</b>	Document
<b>Dose</b>	Total amount of an agent administered to, taken up by, or absorbed by an organism, system, or (sub)population (WHO 2004). Dose is expressed as weight (grams or milligrams) or as weight of test substance per unit of weight of test animal (e.g. milligrams per kilogram body weight), or per skin surface unit (e.g. milligrams per square centimetre of skin), or as constant dietary concentrations (parts per million or milligrams per kilogram of food) (based on EC B.26).
<b>Dose descriptor</b>	Dose descriptor is used to designate the exposure level (dose or concentration) that corresponds to a quantified level of risk of a health effect in a specific study such as NOAEL, LOAEL, BMD, T25 etc. (ECHA, 2012).
<b>DPRA</b>	Direct Peptide Reactivity Assay

<b>EC</b>	European Community
<b>EC Number</b>	EC number, meaning either EINECS number, ELINCS number, NLP number or EC Number appointed by the European Commission under REACH Regulation. The European Community number (EC Number) is a unique seven-digit identifier that was assigned to substances for regulatory purposes within the European Union by the European Commission. The so-called EC Inventory comprises three individual inventories, EINECS, ELINCS and the NLP list (1). (ECHA) also applies the EC number format to what it calls 'List number'[6] The number are assigned under the REACH Regulation without being legally recognised. Hence, they are not official because they have not been published in the Official Journal of the European Union. List numbers are administrative tools only and shall not be used for any official purposes.
<b>ECB</b>	The European Chemicals Bureau
<b>ECETOC</b>	An industry-funded expert not-for-profit think tank whose sole purpose is to enhance the quality of chemicals risk assessment so that chemicals management decisions are informed, reliable and safe.
<b>ECHA</b>	European Chemicals Agency
<b>ECVAM</b>	European Centre for the Validation of Alternative Methods
<b>ED</b>	Endocrine Disruptor
<b>EEC</b>	European Economic Community
<b>EFSA</b>	European Food Safety Authority
<b>EINECS</b>	European Inventory of Existing commercial Chemical Substances
<b>ELINCS</b>	European List of Notified Chemical Substances
<b>ELISA</b>	Enzyme-Linked Immunosorbent Assay
<b>EM</b>	Electron Microscopy
<b>ENM</b>	Engineered Nanomaterial
<b>(US) EPA</b>	(United States) Environmental Protection Agency
<b>EPR</b>	Electron Paramagnetic Resonance
<b>ESAC</b>	ECVAM Scientific Advisory Committee
<b>ESR</b>	Electron Spin Resonance
<b>EST</b>	Embryonic Stem cell Test
<b>ET</b>	Extrathoracic region
<b>Ex vivo</b>	Relates to experiments or measurements done in the laboratory (outside the organism) on a biological substrate (organs, cells, tissues), directly after isolation from a living organism, without modification to the intrinsic properties of the substrate.
<b>EU</b>	European Union
<b>EURL-ECVAM</b>	European Union Reference Laboratory - European Centre for the Validation of Alternative Methods
<b>FCA</b>	Food contact Material
<b>FDA</b>	Food and Drug Administration (federal agency of the United States Department of Health and Human Services)
<b>FFF</b>	Field Flow Fractionation
<b>Finished cosmetic product</b>	The cosmetic product in its final formulation, as placed on the market and made available to the end user, or its prototype (2009/1223/EC)
<b>FL</b>	Fluorescein Leakage test

<b>FTIR</b>	Fourier Transform Infrared Spectroscopy
<b>GARD</b>	Genomic Allergen Rapid Detection
<b>GC/LC-MS</b>	Gas Chromatography/ Liquid Chromatography coupled with Mass Spectrometry
<b>GC-MS</b>	Gas Chromatography–Mass Spectrometry
<b>GE</b>	Gel Electrophoresis
<b>GF-AFC</b>	Glycylphenylalanyl-Aminofluorocoumarin
<b>GI</b>	Gastro-Intestinal
<b>GJIC</b>	Gap Junction Intercellular Communication
<b>GLP</b>	Good Laboratory Practice
<b>GMP</b>	Good Manufacturing Practice
<b>GPMT</b>	Guinea Pig Maximisation Test
<b>GSD</b>	Geometric Standard Deviation
<b>GSH</b>	Glutathione
<b>GSSH</b>	Oxidised Glutathione
<b>GUM</b>	Gesellschaft für Umweltmutationsforschung
<b>H2DCF-DA</b>	2',7'-dichlorodihydrofluorescein diacetate
<b>HATM</b>	Human Alimentary Tract Model
<b>HCA</b>	High Content Analysis
<b>HDC</b>	Hydrodynamic Chromatography
<b>HET-CAM</b>	Hen's Egg Test-Chorio Allantoic Membrane
<b>HPLC</b>	High-Performance Liquid Chromatography
<b>HPRT</b>	Hypoxanthine-guanine Phospho Ribosyl Transferase
<b>HRP</b>	Horseradish Peroxidase
<b>HRTM</b>	Human Respiratory Tract Model
<b>HTS</b>	High Throughput Screening
<b>IARC</b>	International Agency for Research on Cancer
<b>IATA</b>	Integrated Approaches to Testing and Assessment
<b>ICCR</b>	International Cooperation on Cosmetics Regulation
<b>ICE</b>	Isolated Chicken Eye
<b>ICP-MS</b>	Inductively Coupled Plasma Mass Spectrometry
<b>ICRP</b>	International Commission on Radiological Protection
<b>IDEAL</b>	Inhalation, Deposition and Exhalation of Aerosols in/from the Lung
<b>IL-8 Luc</b>	Interleukin-8 luciferase
<b><i>In silico methods</i></b>	Computational approaches that use (quantitative) structure-activity relationship modelling and read-across between substances on the basis of structural or functional similarities (ICCR, 2014).
<b><i>In vitro test method</i></b>	Biological method: using organs, tissue sections and tissue cultures, isolated cells and their cultures, cell lines and subcellular fractions. Non-biological method: such as computer modelling, chemical interaction studies, receptor binding studies etc. (based on Rogiers <i>et al.</i> , 2000)
<b><i>In vivo test method</i></b>	Test method using living (experimental) animals (Rogiers <i>et al.</i> 2000)
<b>IL-1<math>\alpha</math></b>	Interleukin-1 $\alpha$
<b>IR</b>	Infrared Spectroscopy
<b>IRE</b>	Isolated Rabbit Eye

<b>ISO</b>	International Organization for Standardisation
<b>IUPAC</b>	International Union of Pure and Applied Chemistry
<b>IVIVE</b>	In vitro-in vivo extrapolation
<b>JRC</b>	Joint Research Centre
<b>KeratinoSens™</b>	Activation of keratinocytes skin sensitisation assay
<b>KE</b>	Key event
<b>LC50</b>	Median Lethal Concentration 50%: a time dependent, statistically derived estimate of a test article concentration that can be expected to cause death during exposure or within a fixed time after exposure in 50% of animals exposed for a specified time {expressed as mass of test article per unit volume of air (mg/L, mg/m <sup>3</sup> ) or as a unit volume of test article per unit volume of air (ppm, ppb)}.
<b>LC-MS</b>	Liquid Chromatography–Mass Spectrometry
<b>LD50</b>	Median Lethal Dose 50%: a statistically derived single dose of a substance that can be expected to cause death in 50% of the dosed animals (expressed in mg/kg body weight) (EC B.1 bis).
<b>LDE</b>	Laser Doppler Electrophoresis
<b>LDH</b>	Lactate Dehydrogenase
<b>LED</b>	Lowest Effective Dose, e.g. LED10
<b>LLNA</b>	Local Lymph Node Assay
<b>LO(A)EL</b>	The Lowest Observed (Adverse) Effect Level is the outcome of repeat-dose long-term toxicity studies, such as 28-day or 90-day tests with rats, mice, rabbits or dogs, chronic toxicity tests, carcinogenicity tests, teratogenicity tests, reproduction toxicity tests, etc. It is the lowest dose where (adverse) effects can be observed. In the calculation of the MoS, the lowest obtained LOAEL value may be used when a NOAEL is not available. The LOAEL should be expressed as mg/kg bw/d. (ECB, 2003).
<b>Local Effects</b>	A local effect refers to an adverse health effect that takes place at the point or area of contact. The site may be skin, mucous membranes, the respiratory tract, gastrointestinal system, eyes, etc. Absorption does not necessarily occur.
<b>LOD</b>	Level of detection
<b>LOQ</b>	Level of quantification
<b>LPS</b>	Lipopolysaccharides
<b>MEC</b>	Molar Extinction Coefficient
<b>MED</b>	Mass Equivalent Diameter
<b>MIE</b>	Molecular Initiating Event
<b>MM</b>	MicroMass
<b>MMAD</b>	Mass Median Aerodynamic Diameter
<b>MNM</b>	Manufactured Nanomaterials
<b>MoE</b>	Margin of Exposure
<b>MoS</b>	Margin of Safety
<b>MPI</b>	Magnetic Particle Inspection
<b>MPPD</b>	Multiple Path Particle Dosimetry
<b>MPS</b>	Mononuclear Phagocyte System
<b>MS</b>	Mass Spectrometry
<b>MTS</b>	3-(4,5-Dimethylthiazol-2-yl)-5-(3-carboxymethoxyphenyl)-2-(4-sulfophenyl)-2H-tetrazolium, inner salt

<b>MTT</b>	3-(4,5)-dimethyl-2-thiazolyl-2,5-dimethyl-2H-tetrazolium bromide
<b>MW</b>	Molecular Weight
<b>NAMs</b>	New Approach Methodology
<b>NH2-PS</b>	Positively Charged Amino-Modified-Polystyrene
<b>Nanomaterial</b>	An insoluble or bio-persistent an intentionally manufactured material with one or more external dimensions, or an internal structure, on the scale from 1 to 100 nm. (2009/1223/EC). Deviating definitions in other regulatory fields may also exist.
<b>Nanoparticle</b>	Nano-object with all external dimensions in the nanoscale [ISO/TS 80004-2:2015 (CEN ISO/TS 80004-2:2017), Nanotechnologies-Vocabulary-Part 2: Nano-objects]. For the purpose of this document the term 'nanoparticle' is used to also include other forms of nano-object, such as nano-rods, nano-tubes, etc.
<b>Nanoscale</b>	Length range approximately from 1 nm to 100 nm [CEN ISO/TS 80004-1:2015, Nanotechnologies-Vocabulary-Part 1: Core terms]
<b>NanoSIMs</b>	An ultra-high resolution chemical imaging technique
<b>NM</b>	Nanomaterial
<b>NMR</b>	Nuclear Magnetic Resonance
<b>NOAEC</b>	No observable adverse effect concentration
<b>NO(A)EL, NO(A)ELsys</b>	The No Observed (Adverse) Effect Level is the outcome of repeated dose toxicity studies, such as 28-day or 90-day tests with rats, mice, rabbits or dogs, chronic toxicity tests, carcinogenicity tests, teratogenicity tests, reproduction toxicity tests, etc. It is the highest dose for which no (adverse) effects can be observed (based on EC B.26). The NOAEL should be expressed as mg/kg bw/d. In the calculation of the MoS, the lowest obtained NOAEL value is used, in order to take into account the most sensitive species, as well as the relevant effect occurring at the lowest dose possible. Whereas the NOAEL is a dose descriptor for an external dose, the NOAELsys is a dose descriptor of the systemic exposure to a substance and is calculated from the NOAEL by use of the proportion of the substance systemically absorbed.
<b>NP</b>	Nanoparticle
<b>NRU</b>	Neutral Red Uptake
<b>OD</b>	Optical Density
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>OPPTS</b>	Test Guidelines on Pesticides and Toxic Substances
<b>P50, P90</b>	50th, 90th percentile
<b>PALS</b>	Phase Analysis Light Scattering
<b>PBPK</b>	Physiologically based pharmacokinetics
<b>PBPK modelling</b>	Physiologically based pharmacokinetic modelling
<b>PBTK</b>	Physiologically based toxicokinetics
<b>PBTK modelling</b>	Physiologically based toxicokinetic modelling
<b>Personal care products</b>	Consumer products used: for beautification (make up products) and in personal hygiene (shower gel, skin cream, shampoo, feminine hygiene products, diapers, toilet paper etc.)
<b>PET</b>	Positron Emission Tomography
<b>PIF</b>	Product Information File
<b>POD</b>	Point of Departure

<b>POD<sub>sys</sub></b>	The POD <sub>sys</sub> is a dose descriptor for the systemic exposure to a substance and is calculated from the oral POD by use of the proportion of the substance systemically absorbed.
<b>Pow</b>	n-octanol / water partition coefficient
<b>PPAR</b>	Peroxisome proliferator-activated receptor
<b>ppm</b>	parts per million (e.g. mg/kg)
<b>PPRA</b>	Peroxidase Peptide Reactivity Assay
<b>PTA/NTA</b>	Particle Tracking Analysis/Nanoparticle Tracking Analysis
<b>QNAR</b>	Quantitative Nanostructure Activity Relationship
<b>QSAR</b>	Quantitative Structure-Activity Relationship
<b>REACH</b>	Registration, Evaluation, Authorisation and restriction of Chemicals
<b>Reference material</b>	Material sufficiently homogeneous and stable with respect to one or more specified properties, which has been established to be fit for its intended use in a measurement process (ISO, 2008).
<b>RhCE</b>	Reconstructed human Cornea-like Epithelium test method
<b>RhE</b>	Reconstructed Human Epidermis
<b>RIP-oNs</b>	The REACH Implementation Projects on Nanomaterials (RIP-oNs) – aimed at providing scientific and technical advice on key aspects of the implementation of REACH in regard to nanomaterials
<b>RIVM</b>	Rijks Instituut voor Volksgezondheid en Milieu
<b>rLLNA</b>	reduced Local Lymph Node Assay
<b>RNS</b>	Reactive Nitrogen Species
<b>ROS</b>	Reactive Oxygen Species
<b>RS</b>	Raman Spectroscopy
<b>RT-PCR</b>	Reverse Transcriptase Polymerase Chain Reaction
<b>SAED</b>	Selected Area Electronic Diffraction
<b>SAR</b>	Structure-activity relationship
<b>SC</b>	Stratum Corneum
<b>SCC</b>	Scientific Committee on Cosmetology
<b>SCCNFP</b>	Scientific Committee on Cosmetic products and Non-Food Products intended for consumers
<b>SCCP</b>	Scientific Committee on Consumer Products
<b>SCCS</b>	Scientific Committee on Consumer Safety
<b>SCENIHR</b>	Scientific Committee on Emerging and Newly Identified Health Risks
<b>SCHER</b>	Scientific Committee on Health and Environmental Risks
<b>SCHEER</b>	Scientific Committee on Health, Environmental and Emerging Risks
<b>SCs</b>	Scientific Committees
<b>SED</b>	The Systemic Exposure Dose of a cosmetic ingredient is the amount expected to enter the blood stream (and therefore be systemically available) per kg body weight and per day. It is expressed in mg/kg body weight/day. For this definition a mean human body weight of 60 kg is commonly accepted. Since the majority of cosmetic products are applied topically, systemic availability will strongly depend on the dermal absorption of the compound. This can be determined according to the tests described in Section 3-4.1.1. Nevertheless, the results of these tests can be interpreted in two different ways (see Section 3-12.2: dermal absorption issues).



<b>SD</b>	Standard Deviation of the mean
<b>SEM</b>	Scanning Electron Microscopy
<b>SENS-IS®</b>	an in vitro model that measures keratinocyte activation using the human skin model Episkin™ RhE
<b>SERS</b>	Surface Enhanced Raman Spectroscopy or Surface Enhanced Raman Scattering
<b>SHE</b>	Syrian Hamster Embryo
<b>SIT</b>	Skin Irritation Test
<b>SMPS</b>	Scanning Mobility Particle Sizer
<b>SPM</b>	Scanning Probe Microscopy
<b>Spray, sprayable cosmetic product</b>	A formulation is either dispensed by the use of propellant gas as defined in Directive 75/324 (propellant spray), or by a spray bottle with a pump dispenser that forces a liquid through a nozzle generating a spray stream or a mist of a liquid (pump spray) (SCCS/1539/14).
<b>SRB</b>	Sulforhodamine B
<b>SSA</b>	Specific Surface Area
<b>S9</b>	Fraction (supernatant) containing cytosol and microsomes of cells after centrifugation at 9000g
<b>STEM</b>	Scanning Transmission Electron Microscopy
<b>Substance</b>	A chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition (2009/1223/EC).
<b>Systemic effects</b>	Systemic effect refers to an adverse health effect that takes place at a location distant from the body's initial point of contact and presupposes absorption has taken place.
<b>TBA</b>	Thiobarbituric Acid
<b>TEM</b>	Transmission Electron Microscopy
<b>TG</b>	Test Guideline
<b>TH</b>	Thoracic
<b>Tk</b>	Thymidine Kinase
<b>Toxicodynamics</b>	Cover the process of interaction of chemical substances with target sites and the subsequent reactions leading to adverse effects (ECB, 2003).
<b>Toxicokinetics</b>	Describe the time-dependent fate of a substance within the body and include absorption, distribution, biotransformation and/or excretion (ADME) (ECB, 2003)
<b>TTC</b>	Threshold of Toxicological Concern
<b>TUNEL</b>	Terminal deoxynucleotidyl transferase dUTP nick end labelling
<b>Undesirable effect</b>	An adverse reaction for human health attributable to the normal or reasonably foreseeable use of a cosmetic