PRODUCT INFORMATION FILE*

RégimA

Anti-Inflamm-Ageing

Prepared: April 2019
9Label and Packaging update August 2021)

*As required under Article 11 of the European Cosmetics Regulation EC No. 1223/2009

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INTRODUCTION

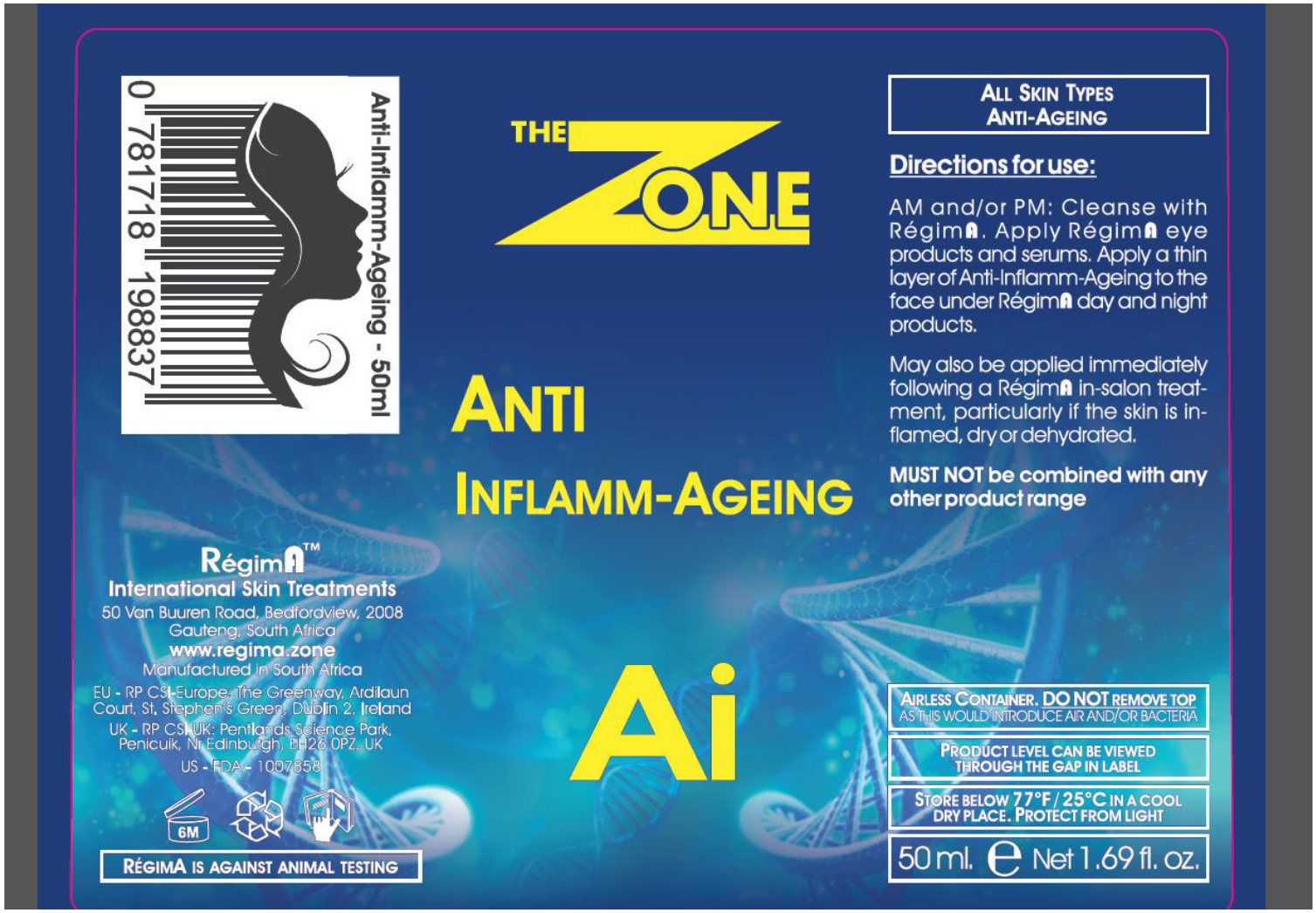
PRODUCT DESCRIPTION

Product Name: Anti-inflamm-Ageing

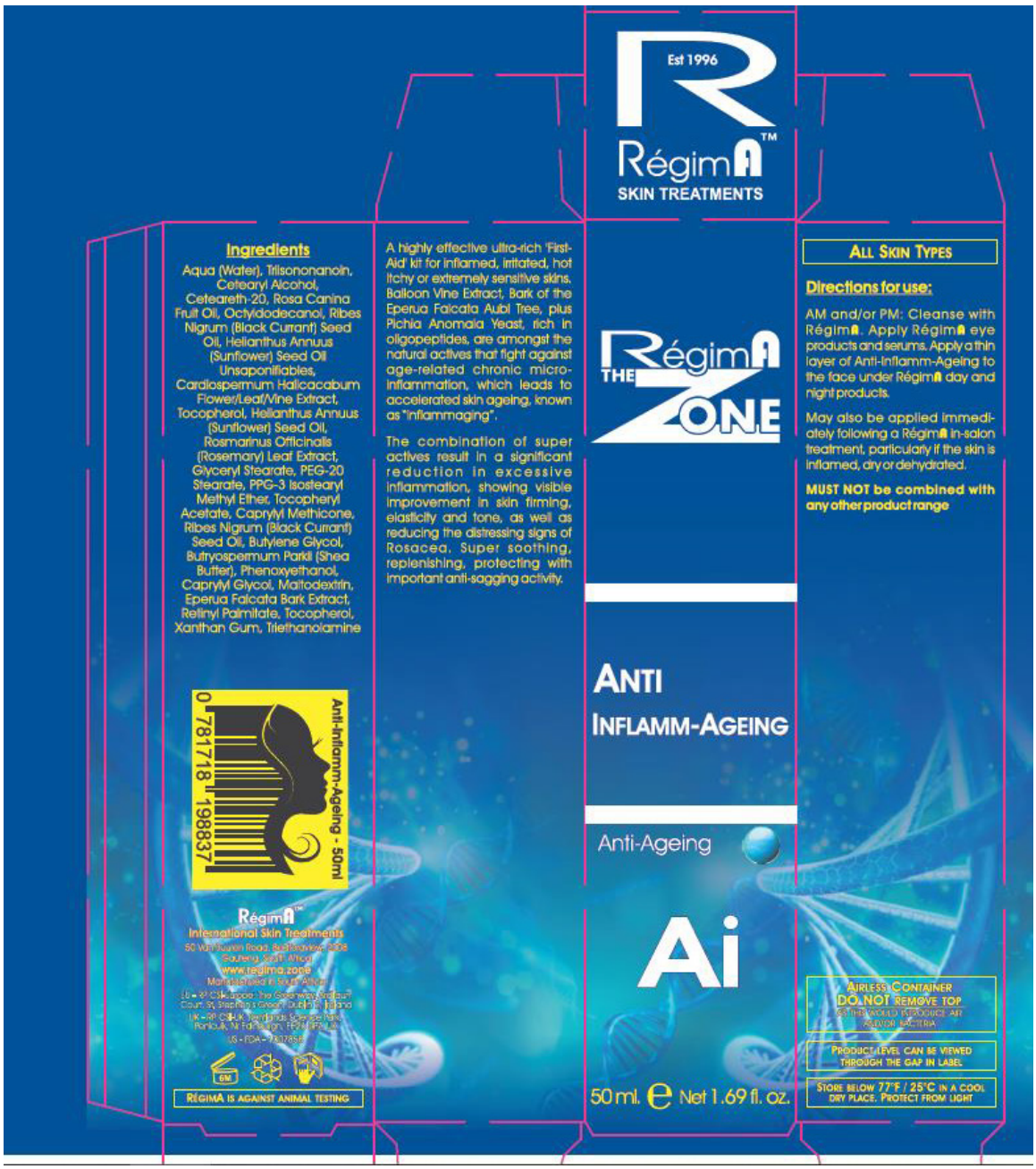
Product type	Skin cream
Form	Cream
Colour	Beige
Pack size	50ml (1.69 fl. Oz)
Pack type	Acrylonitrile-styrene resin (SAN) with a polyethylene liner. The pump is polypropylene.
Dispenser type	Polypropylene pump
Part of a set	No
Manufacturer code	RIC 001
Normal use	**Directions:** AM and/or PM: cleanse with RégimA. Apply RégimA eye products and serums. Apply a thin layer of Anti-inflamm-Ageing to the face under RégimA day and night products. May also be applied immediately following a RégimA in-salon treatment, particularly if the skin is inflamed, dry or dehydrated.

Pictures of the Item: On following page

Container label



Carton label



Batch code: The batch number is printed onto the underside of the carton and the container at the point of manufacturing and filling, therefore it is not visible on the label as represented in this PIF. The batching is automated, so the batch code and date is printed onto the carton and container as they are filled and boxed.

Product claims:

This product has no claims associated with it.

COSMETIC PRODUCT SAFETY REPORT

Part A: Cosmetic Product Safety Information

A.1 Quantitative and qualitative composition of the cosmetic product:

Anti-inflamm-Ageing base formula

No	Raw Ingredient (INCI Name)	% (w/w)	Mixture % w/w Wt(g/kg)	CAS	EC	Function	Supplier (Agent)	Tradename
1	Triisononanoin	7	7	56554-53-1/ 206354-95-2	260-257-1	Skin Conditioning/ Viscosity Controlling	Industria Quimca Lasem (Savannah Fine Chemicals)	2451-Waglinol 3/929
2	Cetearyl Alcohol	3.5	5	67762-27-0/ 8005-44-5	267-008-6	Emollient/ Emulsifying/ Emulsion Stabilising/ Foam Boosting/ Opacifying/ Surfactant/ Viscosity Controlling/ Cleansing/ Emulsifying/ Surfactant	Croda Chemicals	Cosmowax™ D-PA-SG
	Ceteareth-20	1.5		68439-49-6	#			
3	Water (Aqua)	5	5	7732-18-5	231-791-2	Solvent	In House	Deionised Water
4	Rosa Canina Fruit Oil	5	5	84696-47-9/ 84603-93-0	283-652-0	Emollient/ Skin Conditioning	Seatons (Croda)	Rose Hips Oil
5	Octyldodecanol	4.1955	5	5333-42-6	226-242-9	Emollient/ Masking/ Perfuming/ Skin Conditioning/ Solvent	Rahn (Sizeya Chemicals)	Defensil-Plus
	Echium Plantagineum Seed Oil	0.5		84988-87-4	284-877-7			
	Helianthus Annuus Seed Oil Unsaponifiables	0.25		8001-21-6	232-273-9			
	Cardiospermum Halicacabum Flower/Leaf/Vine Extract	0.05		89958-27-0	289-651-1			
	Tocopherol	0.0045		54-28-4 (gamma)/	200-201-5/ 240-747-1/			

No	Raw Ingredient (INCI Name)	% (w/w)	Mixture % w/w Wt(g/kg)	CAS	EC	Function	Supplier (Agent)	Tradename
				16698-35-4 (beta)/ 10191-41-0 (DL)/ 119-13-1/ 1406-18-4/ 1406-66-2/ 2074-53-5 (DL)/ 59-02-9 (D)/ 7616-22-0	233-466-0/ 204-299-0/ 215-798-8/ 218-197-9/ 200-412-2			
6	Glyceryl Stearate	2	4	31566-31-1	250-705-4/ 286-490-9	Emollient/ Emulsifying/ Surfactant	Croda Chemicals	Arlacel 165 FP (CB 07312)
	PEG-100 Stearate	2		9004-99-3				
7	PPG-3 Isostearyl Methyl Ether	4	4	1429060-56-9	#	Emollient/ Skin Conditioning	Croda Chemicals	Arlamol LST-LQ-(MH)
8	Water (Aqua)	2.937	3	7732-18-5	231-791-2	Solvent / Skin Conditioning/ Skin Protecting/ Preservative	Silab (Meganede)	Unflamagyl
	Yeast Extract	0.042		8013-01-2/ 68876-77-7	232-387-9			
	Phenoxyethanol	0.015		122-99-6	204-589-7			
	Ethylhexylglycerin	0.006		70445-33-9	408-080-2			
9	Tocopheryl Acetate	3	3	7695-91-2/ 58-95-7	231-710-0/ 200-405-4	Antioxidant/ Skin Conditioning	DSM Nutritional Products	DL-alpha-Tocopheryl Acetate
10	Caprylyl Methicone	3	3	17955-88-3	241-881-3	Skin Conditioning	Momentive (Savannah Fine Chemicals)	Silsoft 034
11	Ribes Nigrum Seed Oil	3	3	68606-81-5/	271-749-0	Emollient	Sharon Bolel	Blackcurrant

No	Raw Ingredient (INCI Name)	% (w/w)	Mixture % w/w Wt(g/kg)	CAS	EC	Function	Supplier (Agent)	Tradename
				97676-19-2			Chemical Marketing	Seed Oil
12	Butylene Glycol	2	2	107-88-0	203-529-7	Humectant/ Masking/ Skin Conditioning/ Solvent/ Viscosity Controlling	Various	1,3-Butylene Glycol
13	Butyrospermum Parkii Butter	2	2	194043-92-0/ 91080-23-8/ 67701-30-8	293-515-7/ 266-948-4	Viscosity Controlling	BASF	Cetiol SB45
14	Phenoxyethanol	0.975	1.5	122-99-6	204-589-7	Preservative/ Emollient/ Humectant/ Skin Conditioning	Acti-Chem	Microcare® PHG
	Caprylyl Glycol	0.525		1117-86-8	214-254-7			
15	Eperua Falcata Bark Extract	0.15	1	999999-99-4	310-127-6	Absorbent/ Binding/ Emulsion Stabilising/ Film Forming/ Skin Conditioning	BASF Beauty Care (Botanichem)	Eperuline® PW LS 9627
	Maltodextrin	0.85		9050-36-6	232-940-4			
16	Triethanolamine	0.49755	0.5	102-71-6	230-049-8	Buffering/ Emulsifying/ Masking/ Surfactant	Dow Europe	Triethanolamine 99%
	Secondary alkyl- and alkanolamines and their salts*	0.00245		111-42-2/ 110-97-4	203-868-0/ 203-820-9			
17	Retinyl Palmitate	0.2775	0.5	79-81-2	201-228-5	Skin Conditioning/ Antioxidant/ Masking/ Skin Conditioning/	DSM Nutritional Products	Vitamin A Palmitate/M 1.0 MIU/g
	Tocopherol	0.005		54-28-4	200-201-5/			

No	Raw Ingredient (INCI Name)	% (w/w)	Mixture % w/w Wt(g/kg)	CAS	EC	Function	Supplier (Agent)	Tradename
				(gamma)/ 16698-35-4 (beta)/ 10191-41-0 (DL)/ 119-13-1/ 1406-18-4/ 1406-66-2/ 2074-53-5 (DL)/ 59-02-9 (D)/ 7616-22-0	240-747-1/ 233-466-0/ 204-299-0/ 215-798-8/ 218-197-9/ 200-412-2	Masking/ Perfuming/ Skin Conditioning		
	Caprylic/Capric Triglyceride	0.2175		73398-61-5/ 25381-09-1	277-452-2/ 265-724-3			
18	Xanthan Gum	0.3	0.3	11138-66-2	234-394-2	Binding/ Emulsifying/ Emulsion Stabilising/ Gel Forming/ Skin Conditioning/ Surfactant/ Viscosity Controlling	CP Kelco (Tranarc)	Xanthan Gum
19	Tocopherol	0.2	0.2	54-28-4 (gamma)/ 16698-35-4 (beta)/ 10191-41-0 (DL)/ 119-13-1/	200-201-5/ 240-747-1/ 233-466-0/ 204-299-0/ 215-798-8/ 218-197-9/ 200-412-2	Antioxidant/ Skin Conditioning/ Masking	DSM Nutritional Products	DL-alpha-Tocopherol

No	Raw Ingredient (INCI Name)	% (w/w)	Mixture % w/w Wt(g/kg)	CAS	EC	Function	Supplier (Agent)	Tradename
				1406-18-4/ 1406-66-2/ 2074-53-5 (DL)/ 59-02-9 (D)/ 7616-22-0				
20	Water (Aqua)	45	45	7732-18-5	231-791-2	Solvent	In House	Deionised Water

not assigned

* Secondary alkyl- and alkanolamines and their salts is included in the compositional breakdown however it is not included in the ingredients list, see justification presented in Appendix 4.

Ingredient order for the label: Water (Aqua), Triisononanoin, Rosa Canina Fruit Oil, Octyldodecanol, PPG-3 Isostearyl methyl Ether, Cetearyl Alcohol, Caprylyl Methicone, Ribes Nigrum Seed Oil, Tocopheryl Acetate, Butylene Glycol, Butyrospermum Parkii Butter, Glyceryl Stearate, PEG-100 Stearate, Ceteareth-20, Phenoxyethanol, Maltodextrin, Caprylyl Glycol, Echium Plantaginem Seed oil, Triethanolamine, Xanthan Gum, Retinyl Palmitate, Helianthus Annuus Seed Oil Unsaponifiables, Caprylic/Capric Triglyceride, Tocopherol, Eperua Falcata Bark Extract, Cardiospermum Halicacabum Flower/Leaf/Vine Extract, Yeast extract, Ethylhexylglycerin.

Red font denotes ingredients present at less than 1% which may be listed in any order.

Below are the allergens and their respective concentrations in the fragrance that are required to be listed in Article 19 Paragraph 1(d) & (g (ii)) of EC 1223/2009 when present at levels >0.001% in a leave-on product.

Fragrance allergens*

INCI (EU) Name	*CAS number*	*EC number*	*Concentration % w/w*

*Anti-Inflamm-Ageing does not contain a fragrance

A.2 Physical /chemical characteristics and stability of the cosmetic product

Physical and chemical characteristics of the ingredients have been listed in the safety data sheets which are maintained electronically by the Responsible Person and are available on request. A cross reference to the SDS tradename and electronic reference number has been shown in the base formula table.

Physical and Chemical Characterization of the product

1 Physical state	Cream
2 type of mixture (emulsion/ o/w or w/o, suspension, lotion, powder, aerosol …)	Emulsion
3 organoleptic properties (colour, odour, whenever relevant)	Beige smooth cream with characteristic odour.
4 pH (at 25^{o}C)	5.95
5 viscosity (at 25^{o}C)	30,000 cPs
6 thermal stability (glass bottle)	40^{o}C for 12 weeks
7 Specific gravity (at 25^{o}C)	0.940 g/ml

Stability of the product

A shelf-life of 6 months after opening has been allocated to this product.

An on-going stability study of the product in the packaging will be available to support the shelf-life. A stability test of the product in glass jars has confirmed stability at ambient temperature of 25^{o}C for 12 weeks.

Stability testing at 25°C

During testing at 25°C a change in the viscosity was noted in week 2, week 8 and week 12 where the decrease was noted as 20%, 24%, and 23% respectively.

Stability testing at 5°C

Additionally stability testing was performed at 5°C where a decrease in viscosity was noted in week 1; 15%, week 3; 15% and week 8 through to week 12; 44% and 63% respectively.

Stability testing at 40°C

Additional stability testing was performed at 40°C, where the appearance was noted to have become slightly darker on week 12. At this time point there was a noticeable decrease in the pH where there was a 15% decrease.

Also at the week 8 time point the odour was noted to have changed, where the change was noted to be '*slight base odour'.*

A decrease in viscosity was noted from week 2 through to week 8 where the decreases were noted as 20%, 26%, 31%, 52% respectively.

Stability testing at 40°C

Accelerated stability testing was performed at a temperature of 50°C. Testing of the products appearance was noted to have changed from beige to slightly darker to darker from week 8 through to week 12.

The characteristic odour noted in the product was described as *'slight base odour'* from week 8 through to week 12.

The pH of the product was noted to have significantly changed in week 12 where there was a decrease of 14% noted.

A decrease in viscosity was noted from week 1 and week 8 through to week 12; 15%, 55% and 64% respectively.

Accelerated Ageing Rate (AAR)

The Accelerated Aging Rate (AAR) is an calculation that is used to estimate the shelf life of the product. The calculation used is Q10^((Accelerated Aging Temp. – Ambient Temp.)/10) where Q10 is the Accelerated Aging Factor with an industry standard of 2.

AAR = 2^((50 – 25)/10) = 5.66

The study was performed over 12 weeks, 84 days, therefore 84 X 5.66 = approximately 475 days using the Accelerated Aging scenario.

The AAR calculated confirms the 6 month shelf life of the product.

A.3 Microbiological Quality

A PET test has been performed according to USP method 31 and confirms the effectiveness of the preservative for a period of 28 days. The certificate has been presented in Appendix 2.

A.4 Impurities, traces, information about the packaging material

Triethanolamine contains an impurity called Secondary alkyl-and alkanolamines and their salts. Further details on safety and compliance with Regulation 1223/2009 is provided in Appendix 4. In consideration of the requirements outlined in Regulation 1223/2009, safety considerations of the impurity and the evidence of its technical unavoidability in the manufacturing process, this impurity is not expected to be unsafe under the use directions outlined on the label.

A statement on the suitability of the product packaging is shown below.

The WSZ Airless Bottle is made from acrylonitrile-styrene resin (SAN) with a polyethylene liner. The pump is composed of polypropylene. The components of the packaging material and suitability of use criteria are included in a certificate in Appendix 4. This is maintained electronically with the PIF by the Responsible Person and is available on request.

A.5 Normal and reasonably foreseeable use

Anti-Inflamm-Ageing is a product designed as a moisturizer that is typically applied to the face. It is a leave-on product that in normal circumstances will be used twice daily.

A.6 Exposure to the Cosmetic Product

Site of application	Face
Surface area of application (cm^2)	565*
Volume of product applied (mg)	1540**
Frequency of application/use per day	Twice daily
Target population	Adults
Normal and foreseeable exposure route	Dermal
Calculated relative daily exposure according to SCCS notes for guidance tables (mg/kg bw/day)	A relative daily exposure of 25.67 mg/kg bw/day when 1.54g of product is applied daily by a 60kg human.
Dermal absorption information	None

other	NA

*Surface are of application = 565cm^2. The surface area has been established following application to the face surface area = 565cm^2, Table 1; Mean exposed skin surface area per product type and frequency of application per product type, page 76, SCCS notes of Guidance for the testing of Cosmetic Ingredients and their safety Evaluation, 9th revision.

** Volume of product applied = 1540mg. The volume of application applied has been adapted from the surface area to which the product is applied in normal and foreseeable uses. Face cream 1.54g. Table 2; Estimated daily exposure levels for different cosmetic product types according to Cosmetics Europe Data (SCCNFP/0321/00; Hall et *al*., 2007, 2011)

A.7 Exposure to the Substances

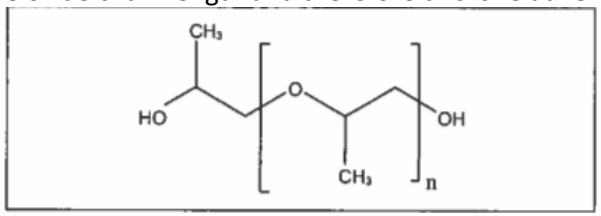
Daily Systemic Exposure Dosage (SED) is the daily amount of a cosmetic substance applied based on the concentration of that particular substance, the percutaneous absorption and the nominal human body weight (60 kg) and this is shown in the table below.

Ingredient (INCI name & CAS number)	Maximum concentration (%)	Calculated product relative daily exposure (mg/kg bw/day)	Dermal penetration factor[#]	Daily ingredient exposure or SED (mg/kg bw/day)
Triisononanoin 56554-53-1	7	25.67	1	1.80
Rosa Canina Fruit Oil 84696-47-9	5	25.67	1	1.28
Octyldodecanol 5333-42-6	4.1955	25.67	1	1.08
PPG-3 Isostearyl Methyl Ether 1429060-56-9	4	25.67	1	1.03
Cetearyl Alcohol 67762-27-0	3.5	25.67	1	0.90
Caprylyl Methicone 17955-88-3	3	25.67	1	0.77
Ribes Nigrum Seed Oil 68606-81-5	3	25.67	1	0.77
Tocopheryl Acetate 7695-91-2	3	25.67	1	0.77
Butylene Glycol 107-88-0	2	25.67	1	0.51
Butyrospermum Parkii Butter 194043-92-0	2	25.67	1	0.51
Glyceryl Stearate 31566-31-1	2	25.67	1	0.51
PEG-100 Stearate 9004-99-3	2	25.67	1	0.51

Ingredient (INCI name & CAS number)	Maximum concentration (%)	Calculated product relative daily exposure (mg/kg bw/day)	Dermal penetration factor[#]	Daily ingredient exposure or SED (mg/kg bw/day)
Ceteareth-20 68439-49-6	1.5	25.67	1	0.39
Phenoxyethanol 122-99-6	0.99	25.67	1	0.25
Maltodextrin 9050-36-6	0.85	25.67	1	0.22
Caprylyl Glycol 1117-86-8	0.525	25.67	1	0.135
Echium Plantagineum Seed Oil 84988-87-4	0.5	25.67	1	0.128
Triethanolamine 102-71-6	0.49755	25.67	1	0.128
Xanthan Gum 11138-66-2	0.3	25.67	1	0.077
Retinyl Palmitate 79-81-2	0.2775	25.67	1	0.071
Helianthus Annuus Seed Oil Unsaponifiables 8001-21-6	0.25	25.67	1	0.064
Caprylic/Capric Triglyceride 73398-61-5	0.2175	25.67	1	0.056
Tocopherol 54-28-4	0.2095	25.67	1	0.054
Eperua Falcata Bark Extract 999999-99-4	0.15	25.67	1	0.039
Cardiospermum Halicacabum Flower/Leaf/Vine Extract 89958-27-0	0.05	25.67	1	0.013
Yeast Extract 8013-01-2	0.042	25.67	1	0.011
Ethylhexylglycerin 70445-33-9	0.006	25.67	1	0.002

No dermal absorption data is available; 100% dermal absorption is used as this is a leave on product.
2# No CAS number assigned.

A.8 Toxicological Profile of the Substances

Ingredient (INCI name & CAS number)	Hazard ID and list[a]	Reference for hazard ID	Irritant to eyes	Irritant to skin	Sensitiser	Human data	NOAEL (mg/kg bw/day)	SED[b]	MoS[c]	comment
Triisononanoin 56554-53-1	A	For use up to 23.5%, In Vitro dermal irritation and sensitization studies evaluated Triisononanoin undiluted on EpiSkin™ reconstructed human epidermis model according to OECD TG 439 where it was predicted not to be irritating. Final report 12/05/2017 available from CIR								
Rosa Canina Fruit Oil 84696-47-9	A	2014 CIR compendium. For use up to 19%, Final report 03/11 available from CIR.								
Octyldodecanol 5333-42-6	A	2014 CIR compendium. For use up to 85%, JACT 4(5):1-29, 1985 confirmed 03/04; IJT 25(S2), 2006.								
PPG-3 Isostearyl Methyl Ether 1429060-56-9	B	Limited data is available publicly for PPG -3 Isostearyl Methyl Ether. Limited publicly available information is available on PPG-3 Isostearyl Methyl Ether this includes ADI, NOAEL or any toxicological data. Therefore, the information provided on the SDS was initially used to evaluate the safety of the ingredient. The GHS Classification states that it is not a hazardous substance or mixture however it is stated that it may irritate eyes and the skin along with potential irritation of the respiratory tract, the SDS is presented in Appendix 1. To ensure full safety of PPG-3 Isostearyl Methyl Ether a read across was performed to Polypropylene Glycol Methyl Ether (PPGME) where a Toxtree assessment was carried out. The read across was justified due to the close nature of the two compounds structures. Polypropylene glycol has a standard structure where n indicates the average propylene oxide chain length and therefore this is relative in the name, Image 1.  Image 1: Polypropylene glycol structure. Therefore, PPG-3 would have n=2 with additional Isostearyl Methyl Ether groups attached in comparison PPGME has n=1 with an additional Methyl Ether group attached. Due to the limited differences in the two								

Ingredient (INCI name & CAS number)	Hazard ID and list[a]	Reference for hazard ID	Irritant to eyes	Irritant to skin	Sensitiser	Human data	NOAEL (mg/kg bw/day)	SED[b]	MoS[c]	comment
		structures the read across was justified. The Toxtree assessment was performed using the Cramer rules and the revised Cramer decision tree which have both classed PPGME as High (Class III). The Cramer Rules describes a High (Class III) substance as a substance with chemical structure that permits no strong initial impression of safety and may even suggest a significant toxicity, a threshold of toxicological concern was established as 90 µg/day (1.5µg/kg bw/day). The Revised Cramer decision tree High (Class III) substance describes a substance with a chemical structures that permits no strong initial presumption of safety or may even suggest significant toxicity or have reactive functional groups, the 5th percentile NOEL is established as 0.15mg/kg bw/day with a human exposure threshold of 0.09 mg/person/day. A further Toxtree assessment was performed to evaluate the skin irritation/corrosion potential of PPGME which concluded in an 'irritating to skin' classification. All assessments are presented in Appendix 4. Human health data available on Polypropylene ethers has indicated that dermal absorption is slower than oral or inhalation where excretion is via the urine and expired air. To determine the penetration potential of PPGME an evaluation of the Log K_{ow} values was performed and it was established as -0.437 (Propylene Glycol Ethers OECD SIDS, November 2003). the K_{ow} ; Octanol-water Partition coefficient is a measure of the compounds hydrophilicity or lipophilicity, the Log K_{ow} values are between -3 (very hydrophilic) and +10 (extremely hydrophobic) (Octanol-Water Partition Coefficient) therefore it was determined that PPGME was a hydrophilic compound. With this it was concluded that dermal penetration would be limited due to the skin being primarily hydrophobic. Skin irritation studies performed on rabbits skin indicated that PPGME was slightly irritating with a negative result in Skin Sensitization (Guinea Pig) studies Propylene Glycol Ethers OECD SIDS, November 2003, Section 3 Human Health, Table 8; Eye/Skin irritation (Rabbits) and Sensitization (Guinea Pigs). A Dermal NOAEL for PPMG was established as >1000 mg/kg day where no systemic toxicity but limited dermal irritation was observed Propylene Glycol Ethers OECD SIDS, November 2003, Section 3 Human Health, Table 9; Repeated Dose Mammalian Toxicity.								

Ingredient (INCI name & CAS number)	Hazard ID and list[a]	Reference for hazard ID	Irritant to eyes	Irritant to skin	Sensitiser	Human data	NOAEL (mg/kg bw/day)	SED[b]	MoS[c]	comment
		Using the derma NOAEL was used to calculate a MoS, the MoS was calculated to be 160 (Dermal NOAEL 1000mg/kg ÷ SED 6.24 mg/kg bw/day) A MoS of greater than 100 is generally considered safe. PPG -3 Isostearyl Methyl Ether is presented on formulation at 4%, 6.24 mg/kg bw/day higher than that outlined in the Cramer Rules and Revised Cramer Decision. The additional data provided in the read across had confirmed the safety of the ingredient. It was therefore concluded that PPG -3 Isostearyl Methyl Ether is expected safe for use in Anti-inflamm-agein when used as directed.								
Cetearyl Alcohol 67762-27-0	A	2014 CIR Compendium. For use up to 25%, JACT 7(3):359-413, 1998 confirmed 12/05.								
Caprylyl Methicone 17955-88-3	A	Limited public information is available on Caprylyl Methicone. Therefore, the safety assessment of Caprylyl Methicone used information that was obtained from REACH Dossier. The information used was performed for the purposes of REACH and not for the purposes of EC 1223/2009. The Log K_{ow} value was determined as 9, indicating that the compound is hydrophobic. The K_{ow} (octanol-water partition coefficient) is the measure of hydrophilicity/lipophilicity of the compound, the K_{ow} values are typically between -3 (very hydrophilic) and + 10 (extremely hydrophobic) . Caprylyl Methicone is very hydrophobic therefore there is the potential of bio-accumulation due to the compound's affinity for lipids. Skin irritation/Corrosion evaluation was performed according to OECD Guidelines 404 (Acute Dermal Irritation/ Corrosion) where 0.5ml of Caprylyl Methicone was applied to the clipped dorsal region of New Zealand White rabbits where a semi occlusive patch was then applied. The site was observed at 30 and 60 minutes and then 24, 48 and 72 hours post application. No signs of irritation was observed in any of the animals during the study and it was therefore concluded not to be irritating to rabbit skin. The skin sensitization potential was evaluated according to OECD Guidelines 406 (Skin Sensitization) using the								

Ingredient (INCI name & CAS number)	Hazard ID and list[a]	Reference for hazard ID	Irritant to eyes	Irritant to skin	Sensitiser	Human data	NOAEL (mg/kg bw/day)	SED[b]	MoS[c]	comment
		Buehler test. Crl: HA Guinea Pigs (20 in the test group) were used in the evaluation where 100% concentration was applied directly to the skin once a week for 6 hours for 3 weeks where an occlusive patch was applied. The challenge test comprised of the application of 0.75% concentration test material directly to the skin for a single 6-hour application. It was concluded that Caprylyl Methicone was not sensitizing to the skin of guinea pigs. A NOAEL was established as >1,000mg/kg bw following repeated dose toxicity testing on Crl: WI(Han) rats. REACH Dossier CAS no. 17955-88-3 Caprylyl Methicone is present in formulation at 3%, 4.68 mg/kg bw/day where a MoS was calculated to be 214. A MoS of greater than 100 is considered to represent safe use. It was therefore concluded that Caprylyl Methicone is expected to be safe for use in RégimA Anti-inflamm-Ageing when used as directed.								
Ribes Nigrum Seed Oil 68606-81-5	A	2014 CIR Compendium. For use up to 0.3%, Final report03/11 available from CIR. Present in formulation at 3%, however Ribes Nigrum Seed Oil described by the FDA as a food item with a GRAS label. It was therefore concluded safe for use.								
Tocopheryl Acetate 7695-91-2	A	2014 CIR Compendium. For use <=36% (10% in Vitamin E oil), IJT 21(S3):51-116, 2002; Final report 03/2014 available from CIR.								
Butylene Glycol 107-88-0	A	2014 CIR Compendium. For use up to 89%, JACT 4(5):223-48, 1985 confirmed 02/04 IJT 25(S2), 2006.								
Butyrospermum Parkii Butter 194043-92-0	A	2014 CIR Compendium. For use up to 60%, Final report 03/11 available from CIR.								
Glyceryl Stearate 31566-31-1	A	2014 CIR Compendium. For use up to 50%, JACT 1(4):169-92, 1982.								
PEG-100 Stearate 9004-99-3	A	2014 CIR Compendium. For use up to 6%, IJT 24(S1):1-102, 2005.								
Ceteareth-20 68439-49-6	A	2014 CIR Compendium. Safe as used in cosmetics when formulated to be non-irritating, IJT 18 (S3):41-49, 1999; IJT 31(S2):169-244 (2012)								
Phenoxyethanol	A	2014 CIR Compendium. For use up to 1%, JACT 9(2):259-77, 1990.								

Ingredient (INCI name & CAS number)	Hazard ID and list[a]	Reference for hazard ID	Irritant to eyes	Irritant to skin	Sensitiser	Human data	NOAEL (mg/kg bw/day)	SED[b]	MoS[c]	comment
122-99-6										
Maltodextrin 9050-36-6	A	For use up to 4%, Final report 09/22/2015 available from CIR website								
Caprylyl Glycol 1117-86-8	A	2014 CIR Compendium. For use up to 5% IJT 31(S2):147-168, 2012.								
Echium Plantagineum Seed Oil 84988-87-4	A	For use up to 4%, Final report 09/22/2015 available from the CIR.								
Triethanolamine 102-71-6	A	Safe for use in rinse-off products; but 5% in leave on cosmetic products; and should not be used in products containing N-nitrosating agents, JACT 2(7):183-235, 1983; IJT 32(S1): 59-81, 2013								
Xanthan Gum 11138-66-2	A	2014 CIR Compendium. For use up to 6%, Final report 09/12 available from CIR.								
Retinyl Palmitate 79-81-2	A	2014 CIR Compendium. For use up to 5%, JACT 6(3):279-320, 1987 confirmed 06/06								
Helianthus Annuus Seed Oil Unsaponifiables 8001-21-6	A	2014 CIR Compendium. For use up to 2%, Final report 03/11 available from CIR.								
Caprylic/Capric Triglyceride 73398-61-5	A	2014 CIR Compendium. For use up to 84%, JEPT 4(4):105-20, 1980 confirmed 06/01 IJT 22(S1):1-35, 2003.								
Tocopherol 54-28-4	A	2014 CIR Compendium. For use <=5%, IJT 21(S3);51-116, 2002; Final report 03/2014 available from CIR.								
Eperua Falcata Bark Extract 999999-99-4	A	Limited publicly available information is available on Eperua Falcata Bark Extract. The Eperua plant is a *genus* of the flowering plant Fabaceae, Wikipedia document presented in Appendix 4. Eperua Falcata Bark Extract is a species in the genus Eperua is in the family Leguminosae (or known as Fabaceae) in the major group Angiosperms (Eperua Taxonomy). Some of the most important commercial species including soyabeans (*Glycine max*), garden peas (*Pisum Sativum*), peanuts (*Arachis hypogaea*) and alfalfa (*Medicago sativa*), Fabaceae Family.								

Ingredient (INCI name & CAS number)	Hazard ID and list[a]	Reference for hazard ID	Irritant to eyes	Irritant to skin	Sensitiser	Human data	NOAEL (mg/kg bw/day)	SED[b]	MoS[c]	comment
		A read across was performed to Alfalfa (*Medicago sativa*) as they are both present in the family Leguminosae (Fabaceae) where limited information is available on the plant in question. An assessment was performed on An EFSA report has evaluated Alfalfa Protein Concentrate (APC) which is extracted from *Medicago sativa spp. Sativa*) known as Alfalfa. Alfalfa is a source of protein concentrate and parts of the plant (seeds and sprouts) have been used for human consumption in the European Community. APC at a dose of 10 g/day has been tested for its nutritional value in several clinical trials carried out in some countries. APC has been used since 1992 as a food supplement to combat malnutrition in several non-EU countries in the world with no reported deleterious effects. There are no reported cases of allergic reactions to alfalfa in man. However, given the fact that alfalfa is a leguminous plant, cross-reactivity could potentially cause adverse effects in persons who are allergic to foods from the leguminous plant family in particular, peanuts. The EFSA report has analyzed the sequence homology that might exist between alfalfa proteins and known allergens. The Panel concludes that the risk of cross-reactivity in subjects allergic to peanuts cannot be excluded. EFSA Opinion on the Safety of Alfalfa Protein Concentrate Using the dose of 10g/day which was outlined for APC was applied to Eperua Falcata Bark Extract. Therefore: 10g/day - 10,000mg/day 10,000 mg/day ÷ 60kg bw (nominal human weight used) = 166.6 mg/kg bw/day Eperua Falcata Bark Extract is present in formulation at 0.234 mg/kg bw/day 712 times less that that outlined as the daily dose by EFSA Eperua Falcata Bark Extract is not present on the FDA Poisonous Plant Database								

Ingredient (INCI name & CAS number)	Hazard ID and list[a]	Reference for hazard ID	Irritant to eyes	Irritant to skin	Sensitiser	Human data	NOAEL (mg/kg bw/day)	SED[b]	MoS[c]	comment
		It was therefore concluded that Eperua Falcata Bark Extract was safe for use when used as directed.								
Cardiospermum Halicacabum Flower/Leaf/Vine Extract 89958-27-0		Cardiospermum Halicacabum Flower/Leaf/Vine Extract is also known as the Balloon Vine where there was limited publicly available information available. A controlled blind trial in human subjects evaluated the activity of Cardiospermum 10% water-in-oil emulsion. The extract and corresponding base preparations were applied at random to the forearms and kept occluded in a Finn chamber for 16 hours. Blanching and reddening was observed in both preparations. Authors of the report indicate that no adverse effects were seen and that only desirable effects were seen during the trial. In additional clinical trials Halicar® (an ointment preparation that is based on the fresh parts of the flowering plant) was used in an open trial where it was applied up to three times daily over a fortnight to various inflammatory skin diseases where it was noted that the skin improved. Finally in an uncontrolled trail 19/24 subjects whom had itching inflammatory dermatoses skin had improved following the application of 10% Cardiospermum water-in-oil type ointment. *Evidence for the Efficacy and Safety of Topical Herbal Drugs in Dermatology: Part I: Anti-inflammatory agents* is available in Appendix 4. Additional information available on Cardiospermum Halicacabum Flower/Leaf/Vine Extract provide limited information on its toxicological potential. The studies indicate that a moistened crushed leaf was applied topically to rabbit (20-30 g/animal), in a skin irritability model using the Draize method where the results indicated that it did not cause irritation. The hydroalcoholic extract (95%) from the fresh aerial parts in external application did not induce allergenic activity in human beings. Cardiospermum Halicacabum								

Ingredient (INCI name & CAS number)	Hazard ID and list[a]	Reference for hazard ID	Irritant to eyes	Irritant to skin	Sensitiser	Human data	NOAEL (mg/kg bw/day)	SED[b]	MoS[c]	comment
		Using 30g as a worst-case dose of Cardiospermum Halicacabum Flower/Leaf/Vine Extract, which equates to 30,000mg, the toxicity was assessed using a 60kg human, the nominal human default body weight is set at 60kg. Therefore, 30,000mg ÷ 60kg = 500mg/kg. Cardiospermum Halicacabum Flower/Leaf/Vine Extract is present in formulation at 0.05%, 0.078 mg/kg bw/day 6,410 times less than stated in the dermal irritation study. It was therefore concluded that Cardiospermum Halicacabum Flower/Leaf/Vine Extract was safe for use when used as directed.								
Yeast Extract 8013-01-2	B	The yeast strain that is present in the ingredient Unflamagyl is noted as *Pichia anomala.* Limited information is available on the toxicological profile of *Pichia Anomala* so therefore a read across to Baker's Yeast was performed. *Pichia anomala* and Baker's Yeast descent from the same Genus known as *Saccharomyces cervisiae.* Baker's Yeast extract is FDA approved as GRAS, 21CFR184.1983. It was therefore concluded that Yeast extract is safe for use as formulated.								
Ethylhexylglycerin 70445-33-9	A	For use up to 8%, IJT 32 (Suppl. 3):5-21, 2013								

[a] Some ingredients are excluded from a formal risk assessment where a recognized authority has published a review of the ingredient under similar conditions of use and concluded on safe use at the level of inclusion in the cosmetic product (Hazard ID=A). Hazard ID category B is for recognized authority reviews of the ingredient under similar conditions of use with restricted use or where the ingredient is contained in the annexes to Regulation (EC) No 1223/2009 (Hazard ID=B). Where hazard ID A or B is reported, the maximum allowed usage concentration should be stated.

[b] all possible routes of exposure should be considered

[c] A MoS of greater than 100 is considered to represent safe use

Food item, hazard and exposure data not required.

Fragrances:

Anti-Inflamm-Ageing does not contain a fragrance therefore no IFRA certificate is present.

A.9 Undesirable Effects and Serious Undesirable Effects

No undesirable effects are anticipated based on the product being used as directed on the face and body twice daily.

A.10 Information on the Cosmetic Product

Anti-Inflamm-Aging was released in September 3rd, 2018. Over the period September 2018 to February 2019, 900 units have been sold and there have been no adverse reactions reported to RégimA Company.

B: Part Cosmetic Product Safety Assessment

B.1 Assessment Conclusion

Review of the ingredients

After analysis of all the available information including:

- formulation
- toxicological profile of the ingredients and their concentration in the product
- Product data sheets supplied by the ingredient manufacturer

It is not expected that Anti-Inflamm-Ageing will cause damage to human health when used as directed.

It is therefore concluded that Anti-Inflamm-Ageing can placed on the market in the EU as a face moisturizer.

Review of human data on the product

There are no human tests such as a patch test for this product.

B.2 Label Warnings and Instructions for Use

Directions for use are given on the product label and product outer packaging that is present in Appendix 4.

Directions:
AM and/or PM: Cleanse with RégimA. Apply RégimA eye products and serums. Apply a thin layer of Anti-Inflamm-Ageing to the face under RégimA day and night products.

May also be applied immediately following a RégimA in-salon treatment, particularly if the skin is inflamed, dry or dehydrated.

Warnings:
'Must not be combined with any other product range'

'Airless Container DO NOT remove top as this would introduce air and/or bacteria'

'Product level can be viewed through the gap in label'

‘Store below 77°C/ 25°C in a cool dry place. Protect from light’

‘If irritation occurs, discontinue use’

B.3 Reasoning

This product contains many ingredients with a positive reputation for their moisturising properties and with good local tolerance. There are no reasons to anticipate tolerance problems with use.

This product is intended for external use in adults only.

B.4 Assessors Credentials and Approval of Part B

Shirley Hudson (safety assessor)
BSc, University of Aberdeen
CBiol, MSB
20+ years as a practicing toxicologist in the pharmaceutical and chemical industries

After analyzing of all of the available information including the product formulation and toxicological profile of the ingredients, I conclude that according to the current state of scientific knowledge, this product is not expected to result in any significant damage to human health and can be safely marketed for the intended and foreseeable use as a moisturizer.

List of References

SCCS Notes of Guidance for the Testing of Cosmetic Substances and Their Safety Evaluation, 9th Revision, 29 September 2015 (SCCS/1564/15)
European Commission database on cosmetic ingredients (Cosing)
http://ec.europa.eu/consumers/cosmetics/cosing/
Cosmetic ingredient review http://www.cir-safety.org/

METHOD OF MANUFACTURE / GMP CERTIFICATION

intertek
Total Quality. Assured.

CERTIFICATE
OF REGISTRATION

This is to certify that the management system of:

Prime Product Manufacturing (Pty) Ltd

Main Site: Necsa Site, Building VB5, Elias Motsoaledi Street Ext (Church Street West), R104 Pelindaba, Madibeng Municipality, North West

has been registered by Intertek as conforming to the requirements of:

ISO 22716:2007

The management system is applicable to:

The production and packing of personal care products as hair care, skin care, sun care, toiletries and fragrances, including aerosols

Certificate Number:
0072927-00

Initial Certification Date:
07 March 2018

Date of Certification Decision:
07 March 2018

Issuing Date:
07 March 2018

Valid Until:
06 March 2021

Certificate Mark
coming soon

Calin Moldovean
President, Business Assurance

PROOF OF EFFECT CLAIMED

This product makes no direct or implied claims and consequently no proof is required.

ANIMAL TESTING STATEMENT

To the best of our knowledge, the manufacturer and his suppliers have not carried out or commissioned any animal testing for the purpose of developing new cosmetic products.

The statement below is a confirmation of the company policy:

RégimA Skin Treatments

CK92/05371/23
VAT No. 4590131043

Tel: 011 615 2869 or 011 622 7827
Fax: 011 616 8008
Cell: 0836537020
e-mail: jax@regima.com

POSTAL ADDRESS: PO BOX 9523 Edenglen 1613
PHYSICAL ADDRESS: 20 River Road Morninghill Bedfordview 2007 RSA

Animal Testing Compliance Statement

This letter is to serve as testimony as to the practice of animal testing, and confirm that RégimA Skin Treatments has not, nor will not engage in any practice that involves animal testing in any form.

RégimA Skin Treatments hereby confirms neither the manufacturer nor RégimA Skin Treatments itself have commissioned or carried out any form of animal testing during the course of product development. This applies to any and all activities performed as part of the development process, including, but not restricted to: R&D, stability testing, safety and toxicology assessments, suitability studies or any other facet related to the product's development.

Appendix 1: Safety Data Sheets or Ingredient Specifications

Safety data sheets and technical data sheets for the ingredients are maintained electronically with the PIF by the Responsible Person. They are available on request.

Appendix 2: Microbial Challenge Test

A microbial challenge test is maintained electronically with the PIF by the Responsible Person. It is available on request.

Appendix 3: Certificates of Allergen Content

Appendix 4: Miscellaneous

The stability report, packaging material information and product carton insert are maintained electronically with the PIF by the Responsible Person. They are available on request.