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Scientific Committee on Consumer Safety

SCCS

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## OPINION ON

18                   **3-Benzylidene camphor**  
19

20                   **COLIPA n° S61**  
21  
22  
23

24  
25  
26  
27         References are cited in a different way in the opinion compared to the submissions  
28  
29  
30  
31

32         The SCCS adopted this opinion at its 2<sup>nd</sup> plenary meeting  
33                   of 18 June 2013  
34  
35

1

## 2 About the Scientific Committees

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

7 They are: the Scientific Committee on Consumer Safety (SCCS), the Scientific Committee  
8 on Health and Environmental Risks (SCHER) and the Scientific Committee on Emerging and  
9 Newly Identified Health Risks (SCENIHR) and are made up of external experts.

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

## 13 SCCS

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

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40 The opinions of the Scientific Committees present the views of the independent scientists  
41 who are members of the committees. They do not necessarily reflect the views of the  
42 European Commission. The opinions are published by the European Commission in their  
43 original language only.

45 [http://ec.europa.eu/health/scientific\\_committees/consumer\\_safety/index\\_en.htm](http://ec.europa.eu/health/scientific_committees/consumer_safety/index_en.htm)

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1

2 **ACKNOWLEDGMENTS**

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31 Opinion to be cited as: SCCS (Scientific Committee on Consumer Safety), Opinion on 3-  
32 benzylidene camphor, 18 June 2013

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## 2 **1. BACKGROUND**

3

4 Submission I on the UV-filter 3-benzylidene camphor with the chemical name 3-  
5 benzylidenebornan-2-one was submitted by COLIPA<sup>1</sup> in 1988.

6

7 The Scientific Committee on Cosmetic Products and Non-Food products intended for  
8 consumers (SCCNFP) adopted an opinion (1374/1998 on 3-benzylidene camphor at its  
9 plenary of 21 January 1998.

10

11 The substance is currently regulated in the Cosmetics Directive in Annex VII, part 1 n.19  
12 ("List of permitted UV filters which cosmetic products may contain") in a concentration up to  
13 maximum 2%.

14

15 In October 2011, the French authorities notified the Commission that on 24 August 2011  
16 the Agence française de sécurité sanitaire des produits de santé (AFSSAPS<sup>2</sup>), adopted a  
17 Decision, which was published in the Official Journal of the French Republic on  
18 17 September 2011. The Decision adopted prohibits, as a safeguard measure in accordance  
19 with the provisions of Article 12(2) of the Directive 76/768/EEC, the manufacture, import,  
20 export, wholesale distribution, placing on the market free of charge or against payment,  
21 holding with a view to sale or distribution free of charge and use of cosmetic products  
22 containing 3-benzylidene camphor (CAS: 15087-24-8).

23

24 The AFSSAPS report states that the hazard characterisation for this substance is considered  
25 incomplete. In addition, the no observed adverse effect level (NOAEL) and the cutaneous  
26 absorption rate used by the AFSSAPS in connection with the risk assessment results in  
27 insufficient margin of safety to ensure consumer safety in accordance with the SCCS's notes  
28 of guidance<sup>3</sup>. Finally, as endocrine disruption effects were observed in the studies published  
29 in the scientific literature, in the current state of knowledge, the French authorities consider  
30 that it is not possible to conclude that there is no risk to humans.

31

32

## 33 **2. TERMS OF REFERENCE**

34

- 35 1. *Does the SCCS consider 3-benzylidene-camphor safe for use as a UV-filter in cosmetic  
36 products in a concentration up 2.0% taken into account the scientific data provided?*

37

- 38 2. *Does the SCCS have any further scientific concerns with regard to the use of 3-  
39 benzylidene-camphor as a UV-filter in cosmetic products taking into account the  
40 concern about its potential endocrine disruptor properties?*

41

---

<sup>1</sup> COLIPA - European Cosmetics Toiletry and Perfumery Association "Cosmetics Europe"

<sup>2</sup> Now ANSM : Agence nationale de sécurité des médicaments et des produits de santé

<sup>3</sup> Scientific Committee on Consumer Safety (SCCS/1416/11) 2011. The SCCS's notes of guidance for the testing of cosmetic ingredients and their safety evaluation.

Opinion on 3-benzylidene camphor

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1

2 **3. OPINION**3 **3.1. Chemical and Physical Specifications**4 **3.1.1. Chemical identity**6 **3.1.1.1. Primary name and/or INCI name**

8 3-Benzylidene camphor

10 **3.1.1.2. Chemical names**

12 3-benzylidene-bornan-2-one

13 3-benzylidene-L-camphor.

14 1,7,7-trimethyl-3-benzylidene-2,2,1-bicyclo-2-heptanone

15 1,7,7-trimethyl-3-(phenylmethylene)bicyclo[2.2.1]heptan-2-one

17 **3.1.1.3. Trade names and abbreviations**

19 Mexoryl SD

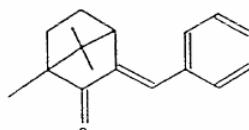
20 UNISOL S-22

22 COLIPA No. S61

24 **3.1.1.4. CAS / EC number**

26 CAS: 15087-24-8

27 EC: 239-139-9

29 **3.1.1.5. Structural formula**33 **3.1.1.6. Empirical formula**35 Formula: C<sub>17</sub>H<sub>20</sub>O37 **3.1.2. Physical form**

39 White crystalline material

40 **3.1.3. Molecular weight**

42 Molecular weight: 240.4 g/mol

43 **3.1.4. Purity, composition and substance codes**

45 According to Submission II of 1991:

1 Batch No. 32778.6  
2

3 Chemical characterisation of 3-benzylidene camphor was performed by IR, NMR and GC\_MS  
4 Purity: 99.1% (% GC Peak area, without using reference material)

5 **3.1.5. Impurities / accompanying contaminants**

6 According to Submission II of 1991:

7 Batch No. 32778.6  
8 Camphor: < 500 ppm  
9 Benzaldehyde: <500 ppm  
10 Benzyl alcohol: < 500 ppm  
11 Heavy metals: < 10 ppm  
12 2-Propanol: 150 ppm  
13 Water content: 0.232%  
14 Ash: 0.16%

17 **3.1.6. Solubility**

18 Soluble in absolute alcohol and isopropanol  
19 Insoluble in water.

21 **Comment**

22 Quantitative data on solubility was not provided

24 **3.1.7. Partition coefficient (Log Pow)**

25 Log Pow 5.37 (Soeborg et al., 2006)

27 **3.1.8. Additional physical and chemical specifications**

28 Melting point: -/77.4°C  
29 Boiling point: /  
30 Flash point: /  
31 Vapour pressure: /  
32 Density: /  
33 Viscosity: /  
34 pKa: /  
35 Refractive index: /  
36 Absorption: λmax:289 nm

38 **3.1.9. Homogeneity and Stability**

39 **Test for photo-stability**

40 A thin film (2um thick) of a.i. in a non-ionic emulsion was exposed to UV produced by  
41 selecting the UVA and UVB wavelengths from simulated solar radiation (SSR) by a dichroic  
42 mirror; the radiation was obtained from a xenon arc and suitable filters. The intensities  
43 were, respectively, 15 and 0.42 mW/cm<sup>2</sup>; in southern France and North Africa, the  
44 corresponding values for natural insolation, measured by the authors' equipment, were 5  
45 and 0.14 mW/cm<sup>2</sup>. Measurement of photo degradation in the film was by  
46 spectrophotometry and HPLC. The experimental methods were elaborated, and seem to  
47 have been carefully carried out. Corrections were made for differences between solar and  
48 SSR intensities and the values that would have been found in a 10 μm film were calculated.  
49 The a.i. was found to attain a photostable isomerisation very rapidly, following which there  
50 was a very slow irreversible degradation (no further details given).  
51

Ref.: 14

**SCCS General Comments to physico-chemical characterisation**

-homogeneity and stability of test solutions used in various studies was not documented

**3.2. Function and uses**

3-Benzylidene camphor is proposed for use as a sunscreen agent at levels up to 6%; in a more recent submission, the concentration proposed by industry is 4%, because of formulation difficulties arising from the low solubility of the agent; in the most recent submission the proposed maximum concentration is 2%.

**3.3. Toxicological Evaluation**

The toxicological evaluation is based on the previous SCCNFP opinion from 1998 (1374/96) and on the dossiers I, II, III and IV on the UV-filter 3-benzylidene camphor with the chemical name 3-benzylidenebornan-2-one submitted by COLIPA respectively in 1988, 1991, 1992 and 1994. The submissions files are only summarizing the experimental studies and original data were not made available to the scientific committee. Recently published articles on 3-benzylidene camphor retrieved from the scientific literature are mentioned and discussed in the opinion. It concerned mainly endocrine properties of 3-BC and were also used to answer question 2 of the mandate.

**3.3.1. Acute toxicity****3.3.1.1. Acute oral toxicity****Rat**

Five male and five female Sprague-Dawley rats were used. The study was performed following the OECD n°401 guideline. The a.i. was given by gavage suspended in 1% propylene glycol in a dose of 5 g/kg bw. Observation was for 14 days. No abnormality of any kind was seen. The LD50 was greater than 5 g/kg bw.

Ref.: 1

**3.3.1.2. Acute dermal toxicity**

No data submitted

**3.3.1.3. Acute inhalation toxicity**

No data submitted

**3.3.2 Irritation and corrosivity****3.3.2.1. Skin irritation****Rabbit**

1 A 6% solution of the compound in isopropyl palmitate was applied to abraded and non-  
2 abraded skin in 6 New Zealand rabbits and kept under semi-occlusion for 24 hrs. The  
3 compound was judged to be a mild irritant under these conditions.

4 Ref.: 5  
5

#### 6 **Rabbit, repeated application**

7 A 6% solution in isopropyl palmitate was used. The skin was carefully clipped on both flanks  
8 and each animal had 2 ml of the test material rubbed into the flank on one side. A similar  
9 procedure, without the solution, was carried out on the other flank. Animals received  
10 applications on 5 days per week for 6 weeks. The experiment was then continued for a  
11 further week without treatment, to study recovery. The weekly mean index of irritation  
12 (maximum, 8) was: 1.83; 1.83; 1.21; 2.23; 1.13; 2.07 and (recovery) 1.0. Under these  
13 conditions the substance was judged to be a mild irritant.

14 Ref.: 6  
15

#### 16 **3.3.2.2. Mucous membrane irritation**

##### 17 **Rabbit**

18 A 6% solution of a.i. in isopropyl palmitate was applied to one eye. The untreated eye  
19 served as control. The indices of ocular irritation were as follows: 5.33/110 directly after  
20 administration; 2.67/10 on day 1; 0.67/10 on day 2; thereafter negative. The authors  
21 judged the compound under the conditions of the test to be "very slightly irritant."  
22

23 Ref.: 4  
24

#### 25 **3.3.3. Skin sensitisation**

##### 27 **Guinea pig**

28 Twenty albino animals of the Hartley strain were used. For induction, 0.5 g of the  
29 compound, as a powder, was applied under occlusion for 48hrs, 3 days a week, for 10  
30 applications. On days 1 and 10, an intradermal injection of 0.1 ml of Freund's complete  
31 adjuvant, 50% in saline, was given.

32 After a 12 day rest, a challenge application, the same as the induction application, was  
33 made to a new site. No sign of sensitisation was observed.

34 Ref.:7  
35

#### 36 **3.3.4. Dermal / percutaneous absorption**

##### 38 **Taken from previous opinion**

##### 39 **Man**

40 Four volunteers were treated. Areas of 100 cm<sup>2</sup> were delineated on the upper arm. The  
41 14C-labelled compound was made up in a concentration of 5.02% in an o/w emulsion.  
42 About 0.5 g of ointment was applied to the delineated areas (exact amount calculated by  
43 difference). Contact was for 6 hours, without occlusion. At the end of the experiment, the  
44 skin was swabbed clean and also stripped. Urine and faeces were collected for 5 days.  
45 The mean amounts in the urine and faeces over 5 days, as a percentage of the amount  
46 applied, equalled 3.54% +/- 1.77%.

47 Ref.: 13  
48

49 In submission IV (1994), the applicant considered that this study did not have adequate  
50 recovery. Therefore a new study has been performed.

51

52

53

54 **Man**

1  
2 In another similar investigation, an o/w emulsion containing 5% a.i. (0.5% labelled with  
3  $^{14}\text{C}$  was applied over 100  $\text{cm}^2$  of the forearm in 6 healthy male volunteers). About 300 mg  
4 of formulation was applied (e.g. 15 mg of active ingredient); the exact amount was  
5 calculated by difference. Occlusion was not used, and the application was allowed to remain  
6 for 6 hours. At the end of that time, the amount remaining on the skin was removed with a  
7 spatula, and the skin swabbed 5 times with ether. All the removed samples were counted.  
8 In addition, 10  $\text{cm}^2$  of the area of application was stripped 15 times, and radioactivity  
9 counted in the strips in batches of 5 strips. Urine was collected from 0 to 6 hours, 6 to 24  
10 hours, and every 24 hours for a total of 120 hours. Faeces were collected every 24 hours for  
11 120 hours.

12 In urine, the total amount of radioactivity found amounted to 0.53% +/- 0.25 of the net  
13 amount applied. For faeces, the corresponding amount was 1.37% +/- 0.66. In all, 1.89 +/-  
14 0.70% of the  $^{14}\text{C}$  activity applied was recovered in the urine and faeces within 5 days. The  
15 total recovery was 91.95% +/- 2.83. If one makes the assumption that the percentages in  
16 the urine and faeces represent the amount absorbed, the mean absorption found is  
17 approximately 0.12 mg/kg bw.

18 Ref.: 21

19  
20 **SCCS Comments**

21 Both studies were performed with a low number of male volunteers which does not allow  
22 conclusions to be drawn on the interindividual variability in humans. The original data of  
23 these studies were not made available to the SCCS and no explanations were given to  
24 explain the higher absorption measured in the first study. Therefore the SCCS considered  
25 that, based on the results of the second study which has an adequate recovery rate, the  
26 amount + 2SD of skin penetration should be used for risk assessment:  $1.89 + 2 \times 0.70 =$   
27 3.29%.

28 **3.3.5. Repeated dose toxicity**

29  
30 **3.3.5.1. Repeated Dose (28 days) oral toxicity**

31  
32 **Taken from previous opinion 1374/98**

33  
34 **Rat**

35  
36 A 4 week oral study by gavage was carried out according the OECD guideline n° 407 and  
37 complies with GLP. Groups of 10 male and 10 female animals were given doses of 0, 250,  
38 375 and 550 mg/kg bw/day. The a.i. was suspended in 1% carboxymethylcellulose. In  
39 addition to the usual clinical observations, weighing, etc., blood and urine samples were  
40 taken immediately before sacrifice. All animals were subjected to necropsy, and 10 organs  
41 were fixed and subjected to histological examination; numerous other tissues were also  
42 fixed for future examination if required. The stability of the a.i. in its vehicle was confirmed  
43 by analysis.

44  
45 There were no deaths. Clinically the only abnormal finding was alopecia. It was observed in  
46 a few males from the group 3 (375 mg/kg bw/day), and in the female from the three  
47 treated groups.

48 Body weight gain showed a significant reduction in all dosed female groups.

49  
50 Food consumption was not affected. There was a significant dose related increase in weight  
51 of the adrenal glands in female animals; the weight of the liver showed a significant, dose  
52 related increase in all dosed animals. No macroscopic or microscopic abnormalities were  
53 found in any group. In female animals, haematological investigations showed a significant,  
54 dose related fall in haemoglobin and packed cell volume; there were highly significant

1 reductions in MCH in all dosed groups, but they were not dose related. On the other hand,  
2 mean corpuscular haemoglobin concentration, red cell count and mean corpuscular volume  
3 were normal. In male animals there were no important changes in the blood picture. In both  
4 sexes, the prothrombin time showed a significant increase, which was not dose-related, in  
5 all dosed groups.  
6

7 Biochemical investigation of the blood showed a very striking reduction of cholesterol levels  
8 in all dosed groups (cf. Results from sub-chronic toxicity, infra). In male animals, bilirubin  
9 was reduced in a dose related manner, and protein was somewhat increased. In female  
10 animals glucose, protein and alkaline phosphatase levels were all very significantly  
11 increased in all dosed groups, but the increases did not seem to be dose related. Lipids do  
12 not seem to have been measured. Examination of the urine revealed no abnormality.  
13

14 Apparently, a NOAEL (which would be lower than 250 mg/kg bw/d) has not been  
15 established from that study.

Ref.: 2

18 **Rat**

21 Groups of 10 male and 10 female SD rats were given doses of a.i. of 0, 25 and 50 mg/kg  
22 bw/day by gavage for 6 weeks. The study was conducted according to GLP.  
23

24 There were no deaths. The chief clinical finding was alopecia chiefly in females at the high  
25 dose.  
26

27 Body weight and body weight gain were unaffected. There were some falls in food  
28 consumption in female animals in two of the weeks and rises in other weeks, probably not  
29 biologically significant.  
30

31 Haematological investigations were carried out at the end of the experiment; there were  
32 falls in haemoglobin and haematocrit in female dosed animals, but these were small and  
33 within normal limits.  
34

35 Biochemical investigations showed changes in female animals only, as follows. Cholesterol  
36 had reduced by about 55% in dosed animals. Triglycerides had increased by 63% and 88%  
37 respectively in dosed animals. Albumin had reduced by about 8% and globulins had  
38 increased by about 40% in dosed animals. Electrophoresis of the plasma in female animals  
39 showed that the increase in albumin was not dose related, and that there was a significant  
40 dose related increase in alpha1 globulins without any increase in alpha2, beta or gamma  
41 globulins.  
42

43 The blood levels of thyroid hormones showed some changes in both male and female  
44 animals. In males, triiodothyronine (T3) showed a dose related increase, significant at the  
45 higher dose, but no change in thyroxine (T4). In female animals, T3 showed no change, but  
46 T4 showed a significant dose related increase in both dosed groups. In females, there was a  
47 dose related reduction in aspartate aminotransferase.  
48

49 Urinalysis showed no abnormality in either sex.  
50

51 At necropsy, no macroscopic abnormalities were found.  
52

53 There was a dose related increase in absolute liver weight in female animals, reaching  
54 significance at the higher dose; similarly with the adrenals, although this reached only the  
55 level of p = 0.05, whereas the former reached p = 0.01.

1 The relative weights of livers and spleens showed some increase, but although this was  
2 statistically significant, it was small and probably not biologically significant (no dose given).  
3 A similar observation applies to the adrenal glands.  
4  
5 Microscopic examinations indicated a follicular and epithelial thyroid hyperplasia and a  
6 hypertrophy of the fasciculated zone in adrenals from the treated female groups.  
7 Ophthalmological examinations at sacrifice showed no differences between control and  
8 treated animals.  
9  
10 Apparently, a NOAEL (which would be lower than 25 mg/kg bw/d) has not been established  
11 from that study.

Ref.: 15

### 16 **Guinea pig**

19 Female animals only, of the Dunkin Hartley strain, were used in this study. In a preliminary  
20 experiment, one animal was treated by gavage with 500 and one with 1000 mg/kg bw/day  
21 for 15 days. No abnormality was found, and the dose of 500 mg/kg bw/day was chosen for  
22 the main study.

24 Two experiments were conducted in parallel, in accordance with GLP. In one, groups of 5  
25 female animals were used, one group receiving 0 and one 500 mg/kg bw/day by gavage,  
26 for 6 weeks. In the second experiment, groups of 10 animals were similarly treated for 8  
27 weeks. The mode of administration of the a.i. is not clear. It was suspended in 2%  
28 polysorbate 80 and given by oral route.

30 The available study summary states, that there were 3 deaths, one in the control group and  
31 2 in the dosed group. In each case the death was attributed to aspiration of feed. The only  
32 abnormal finding was alopecia in the nuchal region in one control animal and one treated  
33 animal: on the basis of the histological appearances, the former was attributed to rubbing  
34 off the food hopper, and the latter to underlying dermatitis.

36 Body weight gain was unaffected. At autopsy, there were no important macroscopic  
37 findings.

39 Histological examination was made of only a few tissues from 7 animals in all: 2 animals  
40 had examination of the areas of skin which had alopecia, and 2 other animals also had skin  
41 sectioned and examined microscopically; 3 other animals had lung and trachea examined  
42 microscopically, and one of these also had microscopic examination of the thyroid. There  
43 were no important findings in any of the sections.

45 Blood was taken from a number of the animals for estimation of blood levels of the a.i., but  
46 this was not carried out, and the blood was preserved for future analysis if required.  
47 Similarly, the thyroids were removed and kept for future histological examination if  
48 required.

49 This was a very limited protocol, apparently directed entirely towards the problem of the  
50 alopecia found in the rat experiments; in this regard it was negative.

Ref.: 16

### 52 **SCCS comments**

53 A no adverse effect level seems not to have been established in this experiment.

56      3.3.5.2. Sub-chronic (90 days) toxicity (oral, dermal)

**Taken from previous opinion 1374/98****Rat**

A 13 week study was performed following the OECD n° 408 guideline. The compound was administered by gavage in doses of 0, 100, 250 and 500 mg/kg bw/day, 5 days a week, to groups of 10 male and 10 female Sprague-Dawley rats.

Treatment was stopped after 6 weeks in one half of the animals in each group, and these served as recovery groups.

One female rat from the low dose group died at day 26 but it was not considered related to the treatment. Reversible ruffled and yellowish aspect of the furs were observed in all groups as well as depilation in high and mild dose groups and occasionally in low dose group. Decreased body weight gains were observed in males from the high dose group and in females from the high and mild dose groups. At day 13, a decrease in red blood cell count and haemoglobin concentration was observed in the high dose group. An increase in plasma lipids at 13 weeks in female animals at all dose levels. In addition the plasma cholesterol levels were increased in males at the top dose, and in females at the intermediate and top doses. No abnormality of lipids or of cholesterol was found in any animal after 6 weeks without treatment. A decrease testes weight was observed at the highest dose tested at day 13.

In conclusion, the authors considered that since changes in the aspect of the fur and a slight increase in serum total lipids level were seen in rats from the 100 mg/kg bw/day group (females only), this dosage level may represent the LOAEL.

Ref.: 3

**Rat**

A further study using groups of 25 males and females Sprague-Dawley rats was carried out, using doses of 0 (5 males and 5 females), 20 (10 males and 10 females) and 40 (10 males and 10 females) mg/kg bw/day in a similar manner. An abnormally high value for plasma lipids was found in females given 40 mg/kg bw/day; the increase at the lower dose was not significant. The no adverse effect level is probably 20 mg/kg bw/day.

Ref.: 3 bis

**SCCS comments**

The results of these two studies are scarcely reported in submission I report. In the 6 weeks toxicity study described above, effects were observed at the doses of 25 and 50 mg/kg bw/day. In the second study, based on the submission file, no change of biological relevance was seen in animals treated and 40 mg/kg bw/day could be considered as the NOAEL.

**3.3.5.3. Chronic (> 12 months) toxicity**

No data submitted

**3.3.6. Mutagenicity / Genotoxicity****Taken from previous opinion 1374/98****3.3.6.1 Mutagenicity / Genotoxicity *in vitro***

An Ames test was carried out according to GLP, using strains TA 1525, TA 1537, TA 98 and TA 100. Toxicity experiments were not carried out; in strain TA 100 there was a decrease in

1 revertants with increasing dosage, suggesting some toxicity. Testing was carried out up to  
2 1000 µg/plate in each strain. There was no evidence of mutagenic activity.

3 Ref.:10  
4

5 A culture of Chinese hamster ovary cells was used to test for the production of chromosomal  
6 aberrations *in vitro* following the OECD guideline n°473. Without activation, doses up to 80  
7 µg/ml were used, and with activation, doses up to 25 µg/ml. Mytomycin C and  
8 cyclophosphamide were used as control. There was a highly significant increase in  
9 aberrations in the preparation with activation in a dose of 25 µg/ml at 24h.

10 Ref.: 11  
11

### 12 3.3.6.2 Mutagenicity / Genotoxicity *in vivo*

13  
14  
15  
16 Active ingredient dissolved in peanut oil in a constant volume of 10 ml/kg was administered  
17 intra-peritoneally at the dose of 700 or 1400 (males), 800 or 1600 (females) mg/kg in OF1  
18 mice. Bone marrow was sampled 24, 48 and 72h after injection. The toxicity on the bone  
19 marrow was checked by counting the ratio of normo and polychromatic erythrocytes. No  
20 genotoxic effect related to the test compound was observed.

21 Ref.: 12  
22

### 23 SCCS comments

24 Based on the poor quality of the available tests, a firm conclusion on mutagenicity cannot  
25 be drawn.  
26

### 27 3.3.7. Carcinogenicity

28 No data submitted  
29

### 31 3.3.8. Reproductive toxicity

#### 33 3.3.8.1. Two generation reproduction toxicity

36 No data submitted  
37

#### 38 3.3.8.2. Teratogenicity

### 40 Taken from previous opinion 1374/98

#### 41 Rat

42 An oral study according to GLP was carried out using groups of 24 mated female Sprague-  
43 Dawley rats dosed with 0, 15, 50, 100 and 150 mg/kg bw/day of a.i. The numbers of  
44 pregnant animals in each group were, respectively, 22, 23, 24, 24 and 22. The a.i. was  
45 suspended in 1% carboxymethylcellulose and given by gavage from days 6 to 15 of  
46 gestation. Groups of 5 animals were also dosed in the same manner and these were termed  
47 "satellite groups". The chief purpose of this part of the experiment was to obtain blood at  
48 the 10<sup>th</sup> and 15<sup>th</sup> days of pregnancy for the estimation of blood levels of a.i.; the animals  
49 were sacrificed at 15 days and autopsy and examination of the foetuses was carried out in  
50 these animals also.  
51

52  
53

1 There was one death at the top dose. Autopsy revealed the cause of death to be uterine  
2 haemorrhage. Clinical examinations showed that animals receiving 50 mg/kg bw/day and  
3 above had a reddish brown vaginal discharge. This was attributed to the number of  
4 resorptions occurring in these groups. At 50 mg/kg bw/day there was a significant dose  
5 related increase of pale extremities. Body weight gain was reduced at doses of 50 mg/kg  
6 bw/day and above, partly due to resorptions, but also an effect of the a.i. In the last 5 days  
7 of treatment, there was a reduced intake of food in animals receiving 50 mg/kg bw/day and  
8 above.  
9

10 All animals were subjected to autopsy, and about half the foetuses examined for visceral  
11 abnormalities, and the remainder for bone abnormalities.  
12

13 In the dams, the main abnormal findings were: enlarged spleens; haemorrhagic uteri;  
14 haemorrhagic and necrotic placentae; pale liver and kidneys. These were found only in  
15 animals receiving 50 mg/kg bw/day and above. Their incidence was dose related up to 100  
16 mg/kg bw/day; the number of abnormal findings slightly decreased at 150 mg/kg bw/day.  
17 If the numbers of animals showing abnormalities are added up for each of the groups, the  
18 values are: 0, 0, 6, 32 and 6, respectively. There was increased foetal loss at doses of 50  
19 mg/kg bw/day and above; some of the highest dose animals produced no living foetuses at  
20 all. The mean foetal weights decreased at 50 mg/kg bw/day and above, but the differences  
21 were not statistically significant. Increased major abnormalities were found in the foetuses  
22 of animals receiving 100 mg/kg bw/day and above; the increases were significant at 100  
23 mg/kg bw/day -but not at 150 mg/kg bw/day, (although the latter figure was higher than  
24 the laboratory's background incidence); a significant dose related increase in minor  
25 abnormalities and retardation of ossification were found in the offspring of animals receiving  
26 50 mg/kg bw/day and above. In the satellite animals, 2 at the top dose had vaginal  
27 discharge, and 1 animal had pale extremities; there were reductions of body weight gain  
28 and food consumption, and an increase in foetal toxicity.  
29

30 This appears to have been a well conducted study, and is fully reported; there is clear  
31 evidence of embryo-toxicity at 50 mg/kg bw/day and above. The observed major  
32 external/visceral abnormalities (at 100 and 150 mg/kg bw/day), most plausibly result from  
33 retarded development and *in utero* pressure (the finding of retarded ossification is in line  
34 with this hypothesis). The development of these effects may be associated with the  
35 maternal toxicity (note that maternal toxicity is already present at 50 mg/kg bw/day).  
36 The NOAEL for maternal toxicity and embryo-toxicity in this study is 15 mg/kg bw/day. In  
37 an appendix a method for the estimation of the blood levels by HPLC is given, but no figures  
38 for these values are provided.  
39

40 Ref.: 18  
41

#### 42 **SCCS comments**

43 As reported in the Afssaps report, this study does not follow an OECD guideline. However  
44 the protocol seems to be very similar of the OECD TG 414 except that the dams were  
45 treated only until GD 15<sup>th</sup> (instead of GD 18<sup>th</sup>). A NOAEL of 15 mg/kg bw/day can then be  
46 derived from this study, based on maternal and embryo toxicity. This NOAEL can be used  
47 for risk assessment.  
48

#### 49 **Mouse**

50 A similar test to the above was carried out in cr1 CD1 (ICR) BR mice, in conformity with  
51 GLP.  
52 Groups of 25 to 26 animals were mated; the numbers pregnant in each group were 26, 25,  
53 23, 24, 24. Dosing was by gavage at levels of 0, 15, 50, 100 and 250 mg/kg bw/day, from  
54 day 6 to day 15 of pregnancy.  
55

1 The a.i. was suspended in 1% aqueous carboxymethylcellulose. There was one death in the  
2 high dose group from an intubation error. Clinical examination revealed no important signs  
3 attributable to the a.i. There was no effect on body weight gain or food consumption in the  
4 dams.

5 The numbers of implantations, post implantation losses, and of live foetuses showed no  
6 significant differences between the groups. Necropsy of the dams showed no abnormality  
7 attributable to the a.i.

8 Foetal weights were not significantly different between the groups. There was no evidence  
9 of an increase in major abnormalities. A minor abnormality (extra ossification centres in the  
10 sternebrae) was found to be significantly higher than control only in the groups given 15  
11 and 250 mg/kg bw/day. This finding was thought to be fortuitous. There was no evidence of  
12 teratogenic activity, or of toxicity in the dams, and analysis of the dose forms showed that  
13 the target concentrations were very nearly reached. A no effect level of 250 mg/kg bw/day  
14 is proposed by the authors.

15

Ref.: 19

16

## 17 Rabbit

18 Four groups of Himalayan rabbits of the HM strain were used. The a.i., suspended in 2%  
19 polysorbate 80, was administered by gavage over days 6 to 18 of gestation in doses of 0,  
20 50, 150 and 450 mg/kg bw/day. The numbers of pregnant females in each group were,  
21 respectively, 11, 12, 12 & 11.

22 There were no deaths. Regular clinical examination showed no abnormalities. There was  
23 decreased body weight gain from days 6 to 10 in the middle and high dose animals, but the  
24 ultimate body weights at sacrifice (on day 29) showed no significant differences between  
25 the groups. Consumption of food and water is not reported.

26 One animal in group 3 (150 mg/kg bw/day) suffered a necrotic accessory lobe of liver with  
27 haemorrhage and death of all foetuses. At necropsy, all other dams displayed no  
28 abnormalities, and there was no evidence of teratogenic activity.

29

Ref.: 20

30

31

32

## 33 General comments of the SCCS on reproductive toxicity

34

35 Teratogenicity of 3-BC has been investigated in 3 species: rat, cr1 CD1 (ICR) BR mice and  
36 Himalaya rabbits. Both studies on rats and mice seem to have been well conducted even if  
37 they do not completely comply with an OECD guideline. The protocol seems to be very  
38 similar of the OECD TG 414 except that the dams were treated only until GD 15<sup>th</sup>. Based on  
39 the results of these 3 studies it seems that rats are more sensible to the teratogenic and  
40 foeto-toxic effects of 3-BC than the other species investigated. Indeed the effects reported  
41 in rat dams and foetuses have not been reproduced in mice and rabbits. The teratogenic  
42 effects observed may be associated with the maternal toxicity.

43

44 Since the previous opinion from the SCCNFP (1998), new studies reporting some reprotoxic  
45 effects of 3-BC were published:

46

47 In 2009, Faass *et al.* have investigated effects of 3-BC but also of 4-MBC (4-  
48 methylbenzylidene camphor) administered in chow to F0 rats before mating, during  
49 pregnancy and lactation and also to the F1 offspring until adulthood. Female sexual  
50 behaviour was recorded on videotape in adult female F1 on proestrus evening at the  
51 beginning of the dark phase. 3-BC at the doses of 2.4 and 7 mg/kg bw/day reduced  
52 proceptive behavior (jump and ear wiggling) and receptive behaviour (lordosis quotient),  
53 and increased rejection behaviour toward the male. Estrous cycles were also modified as  
54 well as expression of target genes (ER $\alpha$ , ER $\beta$ , SRC-1 and PR (*progesterone receptor*)) (see  
55 3.3.12 for detail). The protocol of this study is not described in detail in the publication and  
56 without the original data, it is difficult to estimate how the observed effects may impair the  
57 reproductive function. This study has also some limitations: the study was performed in

1 separate experiments due to infrastructural limitations which makes it difficult to compare  
2 results for the different doses. Only females of F1 were studied.

3  
4 In 2012, in a review, Krause *et al.*, reported effects of selected UV-filters in cosmetic  
5 products including 3-BC. They reported results from *in vivo* (Schlumpf *et al.*, 2004;  
6 Hofkamp *et al.*, 2008) and *in vitro* studies (Kunz and Fent, 2006; Schreurs *et al.*, 2002). The  
7 data concerning influence of 3-BC on hormonal activities are discussed in section 3.3.12.  
8  
9

10 **3.3.9. Toxicokinetics**

11  
12 **Taken from previous opinion 1374/98**

13  
14 **Investigation of metabolites**

15  
16 **Hairless rat**

17 Two groups of 5 female animals were used. The a.i. was made up as a suspension in  
18 propylene glycol/Tween 80/water and given to animals of the test group in a dose of 30  
19 mg/kg bw by gavage. Animals of the control group received vehicle only. After 30 minutes,  
20 animals were anaesthetised with gamma-butyrolactone and bled. Plasma from the 5  
21 animals in a group was pooled for analysis. Analysis was by HPLC; the internal standard was  
22 3-(4'-methylbenzylidene)-d,1-camphor (S60). The sensitivity of the method enabled 2.5  
23 ng/ml of a.i. to be detected, and 5 ng/ml and above to be quantified.

24 Preliminary experiments had suggested that the 4'-hydroxy derivative of the a.i. might be  
25 the main metabolite, and consequently 3-(4'-hydroxybenzylidene)-d,l-camphor was  
26 synthesised. Six peaks were found; the chief metabolite was, as predicted, 3-(4'-  
27 hydroxybenzylidene)-d,1-camphor. Some of the cis-isomer of the metabolite was also  
28 found. No values are given for the amounts found, or, at least, they could not be read on  
29 the microfiches supplied, which are not of the first quality.

30 Ref.: 22

31  
32 **Rat and human hepatocytes**

33 Hepatocytes were obtained and cultured from (a) male SD rats (number of animals not  
34 stated) and (b) 4 human donors. Of the latter, the first was a woman of 55 with hepatic  
35 metastases from breast cancer; the second a man of 43 following an accident; the third a  
36 male of 53 with a myocardial infarct; and the fourth a female of 65 with hepatic metastases  
37 from colonic cancer. It is not clear whether the cells were obtained at operation or post  
38 mortem. The investigation started with previously frozen cells from donors 1 and 4; during  
39 the investigation fresh hepatocytes became available from donors 2 and 3. The a.i. was  
40 supplied as such and with a 14C label; the 4-hydroxy metabolite was also supplied. The a.i.  
41 was dissolved in DMSO and suitably diluted.

42 It was found to penetrate rapidly into the hepatocytes, but it was also shown to adhere to  
43 the plastic of the tubes and wells used for the experiment, which led to some uncertainty  
44 about the percentages of metabolites produced. Some of the metabolites were the result of  
45 type II processes, and Helix pomatia extract was used as a source of sulfatase and  
46 glucuronidase to study these. The products of metabolism were studied by thin layer  
47 chromatography and by HPLC. The integrity of the cultured cells was studied  
48 morphologically and also by a study of a wide range of enzymatic activities.

49 The a.i. was toxic to human cells from about  $5 \times 10^{-5}$  M to  $10^{-4}$  M. Rat cells were less  
50 susceptible to this effect.

51 Rat cells were found to metabolise the a.i. much more rapidly than human cells; an increase  
52 in metabolites was matched by a fall in the amount of a.i. There was a good deal of  
53 variability in enzymatic activity found in the cells from the 4 human donors. By thin layer  
54 chromatography some 10 metabolites were found, mostly in small quantities; by HPLC 4  
55 major metabolites were found, of which one had the same retention time of the 4-hydroxy

1 metabolite. The report is somewhat difficult to follow in places, but it seems clear that  
2 numerous metabolites of the a.i. are formed in the systems studied, and are probably  
3 formed in man *in vivo* as well.

4 Ref.: 33  
5

## 6 **Pharmacokinetics**

### 8 **Hairless rat, intravenous**

9 Fifteen female hairless rats were used for the test, and 10 for vehicle control. The a.i. was  
10 suspended in propylene glycol/water 75/25 and 3 mg/kg were injected into the tail vein  
11 under intraperitoneal gamma-butyrolactone anaesthesia. Sampling was carried out by  
12 anaesthetising 3 test animals and 2 control animals at each sampling time and taking blood  
13 from the abdominal aorta.

14 Sampling was at 0.25, 0.5, 1, 2 & 4 hours after administration. After extraction, plasma  
15 levels of a.i. and of its 4-hydroxy metabolite were estimated by HPLC. The internal standard  
16 was 3-(4'-methylbenzylidene)-d,l-camphor ("Fusolex 6300"). An additional procedure was  
17 to expose the 4-hydroxy metabolite (probably in methanol) to UV irradiation (wavelength  
18 not specified) before injecting onto the chromatogram. Under these conditions a further  
19 peak was obtained which was attributed to the cis-isomer of the metabolite.

20 The results show that the a.i. has a half-life of 8.35 hrs, and a terminal VD of 6.3 Litres. The  
21 4-hydroxy metabolite appears within 15 minutes, and maintains a lower but parallel  
22 concentration throughout the experiment.

23 Ref.: 23  
24

### 25 **Hairless rat, oral**

26 Female animals were used: 21 test and 14 control. The a. i. was dissolved in propylene  
27 glycol/water and 30 mg/kg were given by gavage under intraperitoneal gamma-  
28 butyrolactone anaesthesia. Blood samples were taken at (hours) 0.25. 0.5, 1, 2, 4, 6 and  
29 24. Three test and 2 control animals were sacrificed under anaesthesia at each sampling  
30 time, and blood taken from the abdominal aorta.

31 The experimental procedure thereafter was identical with that of the preceding experiment  
32

33 A feature of the values of a.i. in the test animals was a considerable variation between the  
34 animals at a given sampling time: e.g., at 0.5 hours, (ng/ml) 800, 14000, 7480; at 4 hrs,  
35 16, 92, 1000. Variations in the concentrations of the metabolite were less marked.

36 Substantial amounts of the a.i. and its metabolite are found at 1 hour; the concentration of  
37 the metabolite is decidedly higher than that of the a.i. thereafter, and at 24 hours, when the  
38 level of the a.i. is below the limit of detection, the amount of metabolite present is  
39 substantial (mean value 23 ng/ml). This is attributed by the author to the presence of a  
40 saturable type II metabolic process in the disposition of the a.i.

41 Ref.:24  
42

### 43 **Mouse, oral**

44 Swiss mice were used, 32 males and 32 females.

45 The a.i. was prepared as before (24) and given by gavage in a dose of 30 mg/kg bw.  
46 Sampling was at (hours) 0.25, 0.5. 1, 2, 4, 6 and 24; this was done under carbon dioxide  
47 anaesthesia and the animals sacrificed. In addition, a sample was taken from 4 male and 4  
48 female animals which had not received any treatment. (Dosing and sampling were carried  
49 out by a different laboratory.

50 The findings show that the 4-hydroxy metabolite and the a.i. were present from 0.25 hours  
51 onwards, but the level of the metabolite was lower than that of the a.i., usually about one  
52 third to one half, with the exceptions of the 4 hour and 6 hour samplings, when the levels  
53 were about equal. Neither the a.i. nor the metabolite is detectable at 24 hours. There are  
54 differences between the findings in the male and female animals, but these do not seem to  
55 be systematic.

56 Ref.:25  
57

1  
2 **Guinea pig, oral**  
3 The test was carried out in 32 Hartley animals, 16 males and 16 females. Dosing and blood  
4 sampling were carried out by CIT (28). Animals were given 30 mg/kg bw by gavage, except  
5 for 2 males and 2 females which had blood taken before any a.i. had been given. Of the  
6 remaining animals, 2 males and 2 females had blood removed from the abdominal aorta at  
7 the following times (hours): 0.25, 0.5, 1, 2, 4, 6 and 24.  
8 Analysis was as described in the preceding experiment.  
9

10 The results show that the levels of a.i. in the males reached a peak (of 36 ng/ml) at 1 hour;  
11 thereafter, the levels fell until there was none detectable at 24 hours. In the females, the  
12 levels were never detectable. The 4-hydroxy metabolite in the males showed a peak at 1  
13 hour (98 ng/ml) and then fell progressively until none could be detected at 24 hours. In the  
14 females, the blood levels of the metabolite reached 3 ng/ml at 0.5 hours and 5 ng/ml at 1  
15 hour; thereafter none could be detected. It seems that there is impaired absorption in  
16 female guinea pigs, compared with males, or that the metabolic handling of the drug is  
17 more rapid in females than in males, and perhaps different from the male in the metabolite  
18 produced or in its excretion.

19 Ref.: 26  
20

21 **Rabbit, oral**  
22 Groups of 2 NZW animals (1 male and 1 female) received 30 mg/kg bw by gavage.  
23 Sampling was carried out before the dose, and at 0.25, 0.5, 1, 2, 4 and 24 hours after it.  
24 (One male and 1 female animal was bled at each interval; after the second venepuncture,  
25 the animals were sacrificed, but no necropsy was carried out. Animal work was carried out  
26 by CIT (29).). The chemical investigation was as before. The plasma levels of a.i. were  
27 lower in females than in males: in males, the level peaked at 1 hour, at 87 ng/ml; in  
28 females at 0.25 hours at 34 ng/ml. It must be remembered, however, that each of these  
29 values represents a sample from one animal only. The levels of the 4-hydroxy metabolite  
30 were much lower, peaking at 10.5 ng/ml at 1 hour in the males, and 4.5 ng/ml in the  
31 females at 0.25 hours. The levels were so low that it was impossible to identify the  
32 metabolite definitely, but it was very probably the 4-hydroxy one as hitherto found.

33 Ref.: 27  
34

35 **Rat, oral**  
36 A similar procedure was carried out in groups of 4 SD rats (2 males and 2 females). In all, 8  
37 such groups were used, being given 30 mg/kg bw of a.i. by gavage except for one group  
38 given vehicle only. Bleeding and sacrifice was carried out at (hours) 0, 0.25, 0.5, 1, 2, 4, 6,  
39 & 24. The animal work was carried out by CIT (32). The results show different patterns in  
40 the males and females.

41 In the males, the level of a.i. rises from 16 to 29 ng/ml from hours 0.25 to 4. It falls at 6  
42 hours and is null at 24 hours. The plasma levels of the 4-hydroxymetabolite are similar but  
43 generally lower, though a little higher than the level of a.i. at 4 hours. In the females, the  
44 levels of a.i. are generally higher, peaking at 73 ng/ml at 0.25 hours, and thereafter falling.  
45 The levels of the 4-hydroxymetabolite are higher than those of the a.i. at all samplings,  
46 reaching 125 ng/ml at 1 hour, and remaining higher than the levels of the a.i. throughout  
47 the experiment.

48 Ref.: 31  
49

50 **SCCS Comments**  
51 These results show differences in the metabolism of 3-BC depending on the species and on  
52 sexes. Metabolism of 3-BC seems to be higher in rats compared to mice, guinea pigs and  
53 rabbits and in male rats compared to female rats. Based on *in vitro* study in rats and human  
54 hepatocytes, the applicant concludes that the metabolism profile is qualitatively similar in  
55 both species, but with important quantitative differences: the metabolism rate was 3 to 10  
56 times higher in rat than in human hepatocytes. The applicant also considers that the higher  
57 level of the hydroxy metabolite in rats may explain the toxicity of 3-BC observed in rats in  
the toxicological studies by oral route. The SCCS considers that this hypothesis should be

1 confirmed by mechanistic explanation and especially a more comprehensive description of  
 2 metabolism in human including human skin compared to rats.  
 3  
 4

5 Data published in the scientific literature and reported by Afssaps  
 6  
 7

- 8 • *Distribution of the UV filter 3-benzylidene camphor in rat following topical application*  
 9 (Søeborg et al., 2006)

10 This study concerns the development of an analytical method to assess the distribution of 3-  
 11 BC in rats following topical application for 65 days. 3-BC (in 80/20 propylene  
 12 glycol/isopropanol) was administered to 32 Sprague-Dawley rats (divided into 3 groups +  
 13 control group) by topical application for 65 days at doses of 60, 180 and 540 mg/kg body  
 14 weight/day. The animals were then euthanized by CO<sub>2</sub> gassing. The adipose tissue, brain,  
 15 muscles and testicles were then removed to test for the presence of 3-BC. The  
 16 concentration of 3-BC in the rat tissues are reported in the following table:  
 17  
 18

19  
 20 Table 1: Concentration of 3-BC found in different rat tissues in µg/g  
 21 (according to Søeborg et al., 2006)  
 22

Tissue	Control (n=3)	60 mg/kg body weight/day	180 mg/kg weight/day.	540 mg/kg body weight/day
Adipose tissue	<LOQ	18.6+3.60	36.4+8.80	30.7+3.20
Brain	<LOQ	0.13+0.03	0.35+0.07	1.20+0.60
Liver	<LOQ	0.05+0.02	0.20+0.05	0.44+0.09
Muscle	<LOQ	0.18+0.06	1.00+0.60	1.30+0.70
Plasma (µg/l)	<LOQ	15.5+3.60	51.2+13.7	88.9+14.0
Testis	<LOQ	0.13+0.03	0.34+0.12	0.62+0.33

23 \*n=8; LOQ = limit of quantification  
 24  
 25

26 All the tissues analysed show the presence of 3-BC after 65 days of exposure, with a higher  
 27 accumulation in adipose tissue (see table 1). This can be explained by the logK<sub>ow</sub> of 5.37  
 28 (lipophilic substance). Though, the highest concentrations are measured in the plasma.  
 29

30 Comments from the SCCS:

31 This study does not allow reaching a conclusion concerning the substance absorption rate.  
 32 Although determining a rate of cutaneous penetration for 3-BC was not possible in this  
 33 study, interesting information about the distribution of 3-BC into the body and target organs  
 34 could be obtained.  
 35

36 **3.3.10. Photo-induced toxicity**

37 **Taken from previous opinion 1374/98**

38  
 39  
 40 3.3.10.1. Phototoxicity / photoirritation and photosensitisation  
 41  
 42

**1 Rabbit, photo-toxicity**

2 Six male and 6 female Albino Bouscat rabbits were used for the test and 6 animals were  
3 used as vehicle controls. One site about 5 X 5 cm in area was prepared on the left flank of  
4 each animal, and 2 on the right. The compound was made up as a 5% solution in 95%  
5 ethanol. One ml of this was applied to the left flank, and to one of the sites on the right  
6 flank, no application was made to the second site on the right flank. The sites on the right  
7 flank were irradiated with 1 med of ultraviolet light daily for 10 days. The irradiation was  
8 carried out by exposure to an "Osram Vitalux" lamp, but its spectral characteristics are not  
9 given. There was no evidence of phototoxicity.

Ref.: 8

**12 Guinea pig, photo-sensitisation**

13 Twelve male and 12 female albino Hartley animals were used in 3 groups.

14 Induction: Animals of group 1 (test) had injections of 0.2 ml of Freund's complete adjuvant  
15 in the foot on day 4 on days 1, 3, 5, 8 and 11, 0.5 ml of a 4% solution of the compound in  
16 olive oil was applied to a prepared site on the back of the neck, followed by exposure for 30  
17 minutes to 2 lamps covering the range of 285 to 450 nm (UVA + UVB). Animals of group 2  
18 (vehicle control) were similarly treated except that the applications were of olive oil only.  
19 Animals of group 3 had the Freund's adjuvant but no other treatment.

20 Challenge: On the 22nd day of the experiment, sites on either side of the lumbar vertebrae  
21 were prepared in all animals.

22 Applications of 10 µl of the following solutions were made to each side: olive oil; 2% of the  
23 compound in olive oil; 2% of the compound in ethanol. The sites were then exposed to  
24 irradiation by one of the lamps (320-450 nm: UVA) for 30 minutes. Readings were made at  
25 24 and 48 hrs. There was no evidence of photo-sensitisation. There was no positive control,  
26 but the test was nevertheless judged by the authors to be satisfactory.

Ref.: 9

**30 3.3.10.2. Phototoxicity / photomutagenicity / photoclastogenicity**

31 -

**33 3.3.11. Human data**

34 No data submitted

35

**37 3.3.12. Special investigations**

38 Since the previous opinion, new studies have been published. Data published in the  
39 scientific literature reported by Afssaps and linked to endocrine effects are summarized  
40 below.

- 42 • Influence on estrogenic signalling

43     ○ *Estrogenic activity and estrogen receptor beta binding of the UV filter  
44       3-benzylidene camphor. Comparison with 4-methylbenzylidene camphor  
45       (Schlumpf et al., 2004a)*

46 In this publication the oestrogenic potential of 3-BC was studied by two *in vitro* tests: a cell  
47 proliferation test on the oestrogen-dependent MCF-7 tumour cell line (*e-screen assay*) and a  
48 receptor (ER $\alpha$  or ER $\beta$ ) ligand binding assay (3-BC), and an *in vivo* uterotrophic test on  
49 immature female rats.

50

1 The *in vitro* cell proliferation test shows that 3-BC produces cell hyper-proliferation, with an  
2 EC<sub>50</sub> of  $6.84 \times 10^{-7}$  M, versus  $1.03 \times 10^{-12}$  M for the reference compound (17 $\beta$ -oestradiol).  
3 This indicates that 3-BC is very weakly oestrogenic compared to 17 $\beta$ -oestradiol.

4  
5 The *in vitro* ligand-receptor interaction test shows that 3-BC binds preferentially to ER $\beta$   
6 receptors.

7  
8 The *in vivo* uterotrophic test was carried out in accordance with the OECD guidelines, but  
9 some details are missing: GLP, physical and chemical characterisation of the product, the  
10 choice of dosage (9 doses ranging from 0.8 to 300 mg/kg body weight/day) and even the  
11 choice of animal strain. A dose ranging from 0.8 to 300 mg/kg body weight/day was  
12 administered to each group of immature female rats by oral gavage for 3 days; they were  
13 then sacrificed 24 hours after the last dose. The results clearly show that, in the  
14 experimental conditions described by the authors, 3-BC produces a significant increase in  
15 uterine weight of immature rats, by comparison with the control group, from a dose of  
16 2 mg/kg body weight/day (ED<sub>50</sub>=45 mg/kg). The dose *per os* which produces no observed  
17 effect is 0.8 mg/kg body weight/day.

18  
19     ○ *The chemical UV-Filter 3-BC causes an oestrogenic effect in an in vivo Fish  
20 Assay (Holbech et al., 2002)*

21  
22 In this study, 3-BC was investigated for its capability to cause vitellogenin induction,  
23 possibly *via* oestrogen receptor binding, in the *in vivo* fish assay: juvenile rainbow trout,  
24 *Oncorhynchus mykiss*, vitellogenin ELISA. A clear relationship was reported by the authors  
25 between the dose of intraperitoneally injected 3-BC and the concentration of plasma  
26 vitellogenin level. Effective dose-values (ED-values) were determined. ED10, ED50 and  
27 ED90 of 3-BC after 6 days (2 injections) were 6.4, 16 and 26 mg/kg/injection, respectively.  
28 These values place 3-BC among the more potent xenoestrogens (10 times as potent as 4-  
29 MBC). The authors considered that even if results in fish and mammals should be compared  
30 with great caution, their results support the findings of Schlumpf *et al.* (2001).

31  
32     ○ *Estrogenic activity of UV filters determined by an in vitro reporter gene assay  
33 and an in vivo transgenic zebrafish assay (Schreurs et al., 2002)*

34  
35 Schreurs *et al.* (2002) also investigated antagonistic oestrogenic activity of 3-BC and other  
36 UV-filters but did not report any effects of the tested compounds.

37  
38     • Influence on androgen activity

39  
40     ○ *UV filters with antagonistic action at androgen receptors in the MDA-kb2 cell  
41 transcriptional-activation assay (Ma et al., 2003)*

42  
43 The authors evaluated the anti-androgenic potential of different UV filters using  
44 transactivation technique of an androgen-dependent reporter gene. When the cells (MDA-  
45 kb2 human tumour cell line) are exposed to the mixture containing the reference androgen  
46 substance and the studied product, the anti-androgenic effect is revealed by the reporter  
47 gene expression decrease engendered by the reference product alone. In the case of 3-BC,  
48 no antagonist effect was observed. Therefore 3-BC does not interfere with the expression of  
49 androgen-dependent genes.

50  
51  
52     • *Endocrine activity and developmental toxicity of cosmetic UV filters – an update  
53 (Schlumpf et al., 2004b)*

54  
55 This publication summarizes the results published previously concerning the oestrogenic  
56 effects of several UV filters. In addition, the authors published the results concerning the

1 effect of those UV filters (including 3-BC and 4-MBC) on pre- and post-natal development.  
 2 3-BC was administered to groups of first-generation (F0) Long Evans male and female rats  
 3 *per os* for 10 weeks at several doses: 0.24, 0.7, 2.4 and 7 mg/kg body weight/day. After  
 4 mating, 3-BC was then administered to the female rats during pregnancy and lactation. The  
 5 F1 rats were then treated until reaching adulthood. The choice of doses was based on the  
 6 study described previously by Schlumpf *et al.* (2004a). Weight gain of pregnant rats was  
 7 reduced by 3-BC (and not by 4-MBC), early postnatal survival rate and thymus weight by  
 8 both compounds at higher doses. 4-Methylbenzylidene camphor and 3-BC delayed male  
 9 puberty, and dose-dependently affected reproductive organ weights of adult male and  
 10 female F1 offspring, with partly different effect patterns. Thyroid weight was increased by  
 11 higher 4-MBC doses. Tissue-specific changes in mRNA levels of estrogen-regulated genes in  
 12 prostate, uterus and brain regions, determined by real-time PCR, and in their response to  
 13 acute estradiol challenge in adult gonadectomized offspring were observed. Lowest effective  
 14 doses were 0.24 mg/kg/day for 3-BC and 7 mg/kg/day for 4-MBC. These results were also  
 15 included in a review on the toxicity of UV filters from Schlumpf *et al.* (2008).

16  
 17 • Multiple hormonal activities

- 18     ○ *Multiple hormonal activities of UV-filters and comparison of in vivo and in*  
 19 *vitro estrogenic activity of ethyl 4-aminobenzoate in fish. Aquat Toxicol 79,*  
 20 *305-324 (Kunz and Fent, 2006)*

21 In this publication, the authors investigated a series of UV filters including 3-BC for multiple  
 22 hormonal activities *in vitro* in human receptor systems and evaluate the predictive value of  
 23 these findings for the activity in fish *in vitro* and *in vivo*. They systematically analysed the  
 24 estrogenic, antiestrogenic, androgenic, and antiandrogenic activity of 18 UV filters including  
 25 3-BC and one metabolite *in vitro* at non-cytotoxic concentrations with recombinant yeast  
 26 systems carrying either a human estrogen (hERalpha) or androgen receptor (hAR). All 19  
 27 compounds elicited hormonal activities, most of them multiple activities. They found 10 UV-  
 28 filters including 3-BC having agonistic effects towards the hER alpha and also anti  
 29 estrogenicity. 3-BC completely inhibited the activity of E2 at the highest concentration  
 30 tested ( $10^{-2}$  M) and produced full dose-response curve. They also identified six UV filters  
 31 including 3-BC and 4-MBC with antiandrogenic activities. 3-BC was not found having  
 32 androgenic activity in the hAR assay.

- 33     ○ *UV Interaction of polycyclic musks and UV filters with the estrogen receptor*  
 34 *(ER), androgen receptor (AR), and progesterone receptor (PR) in reporter*  
 35 *gene bioassays. (Schreurs et al., 2002).*

36 In this publication the authors assessed the interaction of five polycyclic musk compounds  
 37 and seven UV filters including 3-BC with the estrogen receptor (ER), androgen receptor  
 38 (AR), and progesterone (PR) receptor, using sensitive and specific reporter gene cell lines.  
 39 3-BC was found to be antagonists toward the AR and PR. Most effects were observed at  
 40 relatively high concentrations (above  $10^{-6}$  M).

- 41     • *Region-specific growth effects in the developing rat prostate following fetal exposure*  
 42 *to estrogenic ultraviolet filters (Hofkamp et al., 2008)*

43 This study concerns the effect of 3-BC and 4-MBC on the neonatal development of the  
 44 prostate in rats. No effect is observed when 3-BC is administered to the animals (0.07 and  
 45 0.24 mg/kg body weight/day; 4 rats given each dose).

- 46     • *Female sexual behavior, estrous cycle and gene expression in sexually dimorphic brain*  
 47 *regions after pre- and postnatal exposure to endocrine active UV filters (Faass et al.,*  
 48 *2009)*

In this study, the effect of 3-BC on rats sexual behaviour, oestrous cycle and the expression of target genes in different regions of the brain following pre- and post-natal administration *per os* was evaluated. The study was also carried out on the F1 generation. The sexual behaviour of F1 females and their oestrus cycle are modified by 3-BC at doses of 2.4 and 7 mg/kg body weight/day. The expression of target genes (ER $\alpha$ , ER $\beta$ , SRC-1 and PR (*progesterone receptor*)) is disrupted (increased or reduced, depending on the anatomical brain area) in both males and females at all doses (0.24, 0.7, 2.4 and 7 mg/kg body weight/day).

Setting aside the expression of the target genes, the first observable effects (sexual behaviour and modification of oestrus cycle) appear at the dose of 2.4 mg/kg body weight/day. Nevertheless, the authors do not indicate the number of animals in the parents (P) generation, while the four doses were administered not in parallel, but successively. Due to these shortcomings, the results of this study need to be confirmed and cannot be used to for calculation of the MoS but as supportive studies for risk assessment of 3-BC.

#### SCCS comment on studies on endocrine activity

Concerning the potential endocrine disruptor properties of 3-BC, multiple hormonal activities of 3-BC have been reported *in vitro*: estrogenic and anti-estrogenic effects as well antiandrogenic activities. *In vivo*, the expression of target genes (ER $\alpha$ , ER $\beta$ , SRC-1 and PR (*progesterone receptor*)) has been shown to be altered in both males and females rats at doses lower than the NOAEL used to calculate the MoS. Due to some shortcomings in the studies, the results need to be confirmed.

### **3.3.13. Safety evaluation (including calculation of the MoS)**

#### **CALCULATION OF THE MARGIN OF SAFETY**

<b>Amount of cosmetic product applied daily</b>	<b>F</b>	<b>= 18000 mg</b>
<b>Concentration of ingredient in finished product</b>	<b>C%</b>	<b>= 2%</b>
<b>Total amount of active ingredient applied</b>	<b>I=F x C/100</b>	<b>= 360 mg</b>
<b>Typical body weight of human</b>		<b>= 60 kg</b>
<b>Absorption of active ingredient *</b>	<b>A%</b>	<b>= 3.29%</b>
<b>Total amount absorbed</b>	<b>I x A/100</b>	<b>= 12.7 mg</b>
<b>Systemic exposure dose (SED)</b>	<b>9.8/60</b>	<b>= 0.21 mg/kg bw</b>
<b>No Observed Adverse Effect Level (NOAEL)</b>		<b>= 15 mg/kg bw/d</b>
<b>(teratogenicity study, maternal effects, oral, rat)</b>		
<b>NOAEL corrected from bioavailability 50% (default)</b>		<b>= 7.5 mg/kg bw/d</b>

<b>MOS</b>	<b>NOAEL/SED = 36</b>
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\* This is the highest value of two experiments in man, which gave values of 3.29 and 1.9%

### **3.3.14. Discussion**

3-Benzylidene camphor is proposed for use in sunscreen products at levels up 2%.

#### *General Toxicity*

Various batches used for toxicity testing have not been identified with respect to their purity and impurity. The homogeneity and stability of test solutions/suspensions have not been documented. Quantitative data on solubility in various solvents of 3-BC was not reported.

Opinion on 3-benzylidene camphor

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1 The toxicological evaluation is based on the previous SCCNFP opinion from 1998 (1374/98)  
2 and on the dossiers I, II, III and IV on the UV-filter 3-BC with the chemical name 3-  
3 benzylidenebornan-2-one submitted by COLIPA respectively in 1988, 1991, 1992 and 1994.  
4 The submissions files are only summarizing the experimental studies and original data were  
5 not made available to the scientific committee. Recently published articles on 3-BC retrieved  
6 from the scientific literature are also shortly described and discussed in the opinion. It  
7 concerned mainly endocrine properties of 3-BC and were also used to answer question 2 of  
8 the mandate.

9 Acute oral toxicity is low.

10

11 *Irritation/Sensitisation*

12 Tests for primary irritation of the skin and for irritation of the skin on repeated  
13 administration show only slight effects at 6%.

14 Tests for photo-toxicity and for photo-sensitisation were negative, although a positive  
15 control was not used for the latter.

16

17 *Percutaneous absorption*

18 Dermal absorption was investigated in male volunteers in two studies.

19 The SCCS considered that, the second study which has an adequate recovery rate could be  
20 used to estimate skin penetration. However, this study has a low number of male volunteers  
21 which does not allow to draw conclusions on the interindividual variability, the original data  
22 were not made available to the SCCS and no explanations were given to explain the higher  
23 absorption measured in the first study. The amount + 2SD of skin penetration should  
24 then be used for risk assessment:  $1.89 + 2 \times 0.70 = 3.29\%$ .

25

26 *Repeated dose toxicity*

27 One 6 week oral study in the rat showed dose related increases in plasma triiodothyronine  
28 in males, significant at 50 mg/kg bw/day, and in plasma thyroxine in females, significant at  
29 25 and 50 mg/kg bw/day.

30 In two 90 day oral toxicity studies in the rat, elevated plasma lipids were observed in  
31 female rats at doses as low as 20 mg/kg bw/day, although this was not statistically  
32 significant at this dose.

33 The results of the two 90 day studies are scarcely reported in submission I.

34 No NOAEL can be derived from these experiments.

35

36 *Mutagenicity / Genotoxicity*

37 A test for chromosomal aberration *in vitro* was positive, but the Ames test and an *in vivo*  
38 micronucleus test were negative. Based on the poor quality of the available tests, a firm  
39 conclusion on mutagenicity cannot be drawn.

40

41 *Reproductive toxicity*

42 In a teratogenicity study in rats, embryo-toxicity was observed at 50 mg/kg bw/day and  
43 above was observed. The observed major external/visceral abnormalities (at 100 and 150  
44 mg/kg bw/day), most plausibly result from retarded development and *in utero* pressure (the  
45 finding of retarded ossification is in line with this hypothesis). The development of these  
46 effects may be associated with the maternal toxicity. The NOAEL for maternal toxicity and  
47 embryo-toxicity in this study is 15 mg/kg bw/day. This value was used for the MOS  
48 calculation.

49

50 *Endocrine activity*

51 In some recent studies, effect of 3-BC on rats sexual behaviour and oestrous cycle at low  
52 doses (2.4 and 7 mg/kg body weight/day) were reported. These effects may be due to  
53 endocrine activity of 3-BC. Multiple hormonal activities of 3-BC have indeed been reported  
54 *in vitro*: estrogenic and anti-estrogenic effects as well as anti-androgenic activities. 3-BC  
55 was not found having androgenic activity. *In vivo*, the expression of target genes (ER $\alpha$ ,  
56 ER $\beta$ , SRC-1 and PR (*progesterone receptor*)) has been shown to be altered (increased or

1 reduced, depending on the anatomical brain area) in both males and females rats at all  
2 doses (0.24, 0.7, 2.4 and 7 mg/kg body weight/day).

3 **4 Pharmacokinetics**

5 Pharmacokinetic studies show differences in the metabolism of 3-BC depending on the  
6 species and on sexes. Metabolism of 3-BC seems to be higher in rats compared to mice,  
7 guinea pigs and rabbits and in male rats compared to female rats. The reasons for this  
8 discrepancy are not known. Based on *in vitro* study in rats and human hepatocytes, the  
9 applicant concludes that the metabolism profile is qualitatively similar in both species, but  
10 with important quantitative differences: the metabolism rate was 3 to 10 times higher in rat  
11 than in human hepatocytes. The applicant also considers that the higher level of the  
12 hydroxy metabolite in rats may explain the toxicity of 3-BC observed in rats in the  
13 toxicological studies by oral route. The SCCS considers that this hypothesis should be  
14 confirmed by mechanistic explanation and especially a more comprehensive description of  
15 metabolism in human including human skin compared to rats.

16  
17

18 **4. CONCLUSION**

19 Due to MoS < 100, the SCCS considers that the use of 3-benzylidene-camphor as a UV-filter  
20 in cosmetic products in a concentration up 2.0% is **not** safe.

21  
22 Concerning the potential endocrine disruptor properties of 3-BC, multiple hormonal activities  
23 of 3-BC have been reported *in vitro*: estrogenic and anti-estrogenic effects as well anti-  
24 androgenic activities. *In vivo*, the expression of target genes (ER $\alpha$ , ER $\beta$ , SRC-1 and PR  
25 (progesterone receptor)) has been shown to be altered in both males and females rats at  
26 doses lower than the NOAEL used to calculate the MoS. Due to some shortcomings in the  
27 studies, the results need to be confirmed.

28  
29  
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31 **5. MINORITY OPINION**

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