



Scientific Committee on Consumer Safety

SCCS

**OPINION ON**  
**Methoxypropylamino Cyclohexenylidene**  
**Ethoxyethylcyanoacetate (S87)**  
**- Submission II -**



The SCCS adopted this Opinion  
By written procedure on 13 December 2019

## ACKNOWLEDGMENTS

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This Opinion has been subject to a commenting period of a minimum eight weeks after its initial publication (from 08 March until 13 May 2019). Comments received during this period of time were considered by the SCCS.

For this Opinion, complementary data were received and resulted in the following main changes: *sections 3.3.2.1 skin irritation, 3.3.2.2. eye irritation, respective discussion parts, as well as the conclusion on further scientific concerns (cf. point 3).*

## 1. ABSTRACT

### The SCCS concludes the following:

1. *In light of the data provided, does the SCCS consider Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), safe when used as UV-filter in cosmetic products up to a maximum concentration of 3%?*

Based on the data submitted, the SCCS concluded that the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), as a UV-filter in cosmetic products up to a maximum concentration of 3%, is safe.

Inhalation toxicity was not assessed in this Opinion because no data were provided. Hence, this Opinion is not applicable to any sprayable products that could lead to exposure of the consumer's lung by inhalation.

2. *If not, what is according to the SCCS, the maximum concentration considered safe for Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) when used as UV-filter in cosmetic products?*

/

3. *Does the SCCS have any further scientific concerns with regard to the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) in cosmetic products?*

S87 is a secondary amine, and thus is prone to nitrosation and formation of nitrosamines. It should not be used in combination with nitrosating substances. The nitrosamine content should be < 50 ppb.

**Keywords:** SCCS, scientific opinion, Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), UV-filter, Regulation 1223/2009, CAS 1419401-88-9, EC 700-860-3

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### SCCS

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

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## TABLE OF CONTENTS

1.	ABSTRACT .....	3
2.	MANDATE FROM THE EUROPEAN COMMISSION .....	6
3.	OPINION.....	7
3.1	Chemical and Physical Specifications.....	7
3.1.1	Chemical identity .....	7
3.1.2	Physical form .....	8
3.1.3	Molecular weight .....	8
3.1.4	Purity, composition and substance codes.....	8
3.1.5	Impurities / accompanying contaminants .....	9
3.1.6	Solubility .....	11
3.1.7	Partition coefficient (Log P <sub>ow</sub> ).....	12
3.1.8	Additional physical and chemical specifications.....	12
3.1.9	Stability .....	12
3.2	Function and uses .....	13
3.3	Toxicological Evaluation .....	13
3.3.1	Acute toxicity .....	13
3.3.2	Irritation and corrosivity .....	14
3.3.3	Skin sensitisation.....	21
3.3.4	Toxicokinetics .....	22
3.3.5	Repeated dose toxicity .....	24
3.3.6	Reproductive toxicity.....	28
3.3.7	Mutagenicity / Genotoxicity .....	32
3.3.8	Carcinogenicity.....	39
3.3.9	Photo-induced toxicity .....	39
3.3.10	Human data.....	42
3.3.11	Special investigations .....	42
3.4	Safety evaluation (including calculation of the MoS).....	42
3.5	Discussion .....	43
4.	CONCLUSION .....	45
5.	MINORITY OPINION.....	45
6.	REFERENCES .....	46
7.	GLOSSARY OF TERMS .....	48
8.	LIST OF ABBREVIATIONS .....	50

## 2. MANDATE FROM THE EUROPEAN COMMISSION

### Background

Submission I on the UV-filter Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) (CAS 1419401-88-9), with the chemical name 2-Ethoxyethyl (2Z)-2-cyano-2-[3-(3-methoxypropylamino)cyclohex-2-en-1-ylidene]acetate, was submitted by Cosmetics Europe in June 2016.

In July 2017 the SCCS adopted an Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) (CAS 1419401-88-9) (SCCS/1587/17)<sup>1</sup>, with the following conclusion:

*Based on the data provided, the SCCS is of the opinion that genotoxic potential of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) cannot be excluded. Therefore, the SCCS cannot conclude on the safety of S87.*

*More evidence is needed to exclude the genotoxicity concern regarding S87.*

*On the basis of the studies provided, skin and eye irritation potential of the test item cannot be excluded. Dermal penetration data using 5% of the test material should also be provided.*

Submission II on the UV-filter Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) (CAS 1419401-88-9), was transmitted by Cosmetics Europe in July 2018.

According to the applicant the current Submission constitutes industry's response to the request for further information in the first SCCS Opinion (SCCS/1587/17). In addition, the current Submission is intended to support the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) as UV-filter in cosmetic products up to a maximum concentration of 3%.

### Terms of reference

1. In light of the data provided, does the SCCS consider Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), safe when used as UV-filter in cosmetic products up to a maximum concentration of 3%?
2. If not, what is according to the SCCS, the maximum concentration considered safe for Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) when used as UV-filter in cosmetic products?
3. Does the SCCS have any further scientific concerns with regard to the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) in cosmetic products?

### 3. OPINION

#### 3.1 Chemical and Physical Specifications

##### 3.1.1 Chemical identity

###### 3.1.1.1 Primary name and/or INCI name

Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87)

###### 3.1.1.2 Chemical names

IUPAC name: 2-ethoxyethyl (2Z)-2-cyano-2-[3-(3-methoxypropylamino) cyclohex-2-en-1-ylidene]acetate

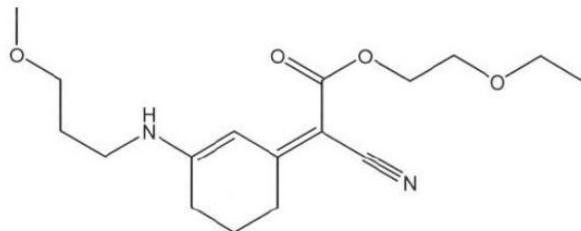
###### 3.1.1.3 Trade names and abbreviations

Colipa No. S 87  
C-1701 B\_C\_3  
C-1701 Merocyanine

###### 3.1.1.4 CAS / EC number

CAS: 1419401-88-9  
EC: 700-860-3

###### 3.1.1.5 Structural formula



###### 3.1.1.6 Empirical formula

C<sub>17</sub>H<sub>26</sub>N<sub>2</sub>O<sub>4</sub>

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

### 3.1.2 Physical form

The UV filter S87 is a yellow solid consisting in form of a powder or small chunks.

### 3.1.3 Molecular weight

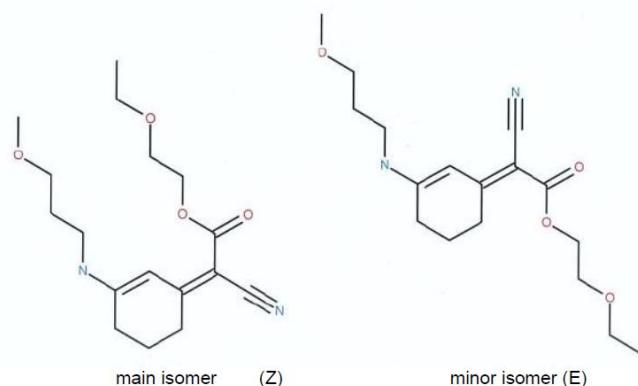
Molecular weight: 322.41 g/mol

### 3.1.4 Purity, composition and substance codes

Batch/Lot:  
1442/3+4  
C-1701/8  
0009511412

Chemical characterisation was performed by UV, FTIR and  $^1\text{H}$ - and  $^{13}\text{C}$ -NMR spectroscopy on the batches 1442/3+4 and C-1701/8. The  $^{13}\text{C}$ -spectra showed the expected signals for the given structure. The  $^1\text{H}$ -NMR results, however, showed the presence of an isomeric mixture. The non-GLP results obtained from different NMR experiments revealed a time-dependent isomerisation of the test item (Z-isomer) to the corresponding E-isomer upon dissolution. The time-dependent investigation yielded equilibrium after ca. 5 hours of an isomeric mixture with a ratio of 1.98: 1.00 for Z-isomer to E-isomer.

The UV filter C-1701 B\_C\_3 is synthesised as Z-isomer and upon dissolution it isomerises within 5 hours to approximately 60% Z-isomer and ca. 40% E-isomer.



Isomeric structures of the UV filter C-1701 B\_C\_3 based on  $^1\text{H}$ - and  $^{13}\text{C}$ -NMR signals

Purity of UV filter C-1701 B\_C\_3 was determined by quantitative  $^1\text{H}$ -NMR spectroscopy with internal standard on the batches 1442/3+4 and C-1701/8.

The following table summarises the analytical profile of the three batches used in toxicological studies.

**Table 1.**

<b>Comparative table of the main analytical results for the three batches 1442/3+4, C-1701/8 and 0009511412</b>			
	Batches tested in toxicological studies		
	<b>batch 1442/3+4</b>	<b>batch C 1701/8</b>	<b>batch 0009511412</b>
Aspect	Yellow powder		
Purity / Content of Main component B_C_3 by HPLC UV (%)	96.2	97.8	98.7
1H-NMR spectroscopy (% w/w)	98.8	96.3	Not provided
Impurities content by HPLC UV			
Content of B_C (area %)	2.22	1.52	1.02
Sum of other impurities greater than 0.1% (area %)	1.41	0.53	0
Sum of other impurities lower than 0.1% (area %)	0.2	0.19	0.25
Other impurities			
Water content (% w/w)	0.13	0.09	0.07
2-Ethoxyethanol (ppm)	120	12	<10
3-methoxypropylamine (ppm)	<500	<500	<500
Diethylsulfate (ppm)	<1	<1	<1

Ref.: 1-3

**SCCS comment**

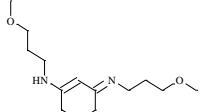
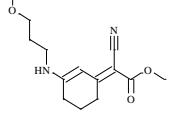
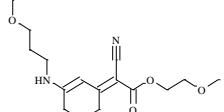
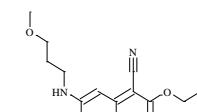
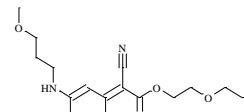
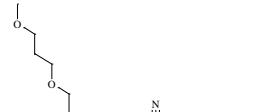
NMR peak purity for the batch 0009511412 was not provided.

The applicant should provide the accurate content of 2-ethoxyethanol, diethylsulfate and 3-methoxypropylamine for all the three batches.

**3.1.5 Impurities / accompanying contaminants**

The impurity determinations were performed by the use of an HPLC-PDA analytical method at  $\lambda_{\text{max}}$  with LOD 0.05%. The structure elucidation was done by HPLC-MS. Table 2 contains quantitative information on the main component and impurities above 0.1% and their structure proposals for the three C-1701 B\_C\_3 samples, which had been derived from HPLC-MS. The contents of 2-ethoxyethanol and 3-methoxypropylamine were determined by means of GC/FID using standard addition method. Diethylsulfate was quantified by means of headspace GC/MS using the standard addition method.

**Table 2.**

<b>Quantitative information on the main component and impurities above 0.1% and their structure proposals for the three C-1701 B_C_3 samples</b>						
<b>Retention Time (min)</b>		<b>Approx. Content* (%area@380nm)</b>			<b>MW (Da)</b>	<b>Proposed Structure (and/or isomer)</b>
<b>LC/MS</b>	<b>HPLC-DAD</b>	<b>1442/3 +4</b>	<b>C-1701/8</b>	<b>00095114 12</b>		
8.7	8.0	**	**	**	254	
21.8	21.4	<0.05	0.11	<0.05	264	
22.6	22.3	<0.05	0.18	<0.05	308	
26.1	25.9	2.20	1.57	0.99	278	 <b>B_C</b>
26.5	26.3	97.66	98.14	98.92	322	 <b>B_C_3</b>
27.5	27.4	0.12	-	-	380	

\* By-product contents are calculated as described in chapter 3. Methodology

\*\* no UV-detection @380nm, detectable at UV range 280-480 nm and by MS

- not detected by UV and by MS (<0.001)

Ref.: 1-8

### SCCS comment

The applicant provided HPLC-PDA chromatograms for all three batches: peak purity and impurities have been quantified at  $\lambda_{\text{max}}$  of the test substance. According to the applicant, these impurities have been chemically characterised by LC-MS. All area-% results for the impurities in the data tables were calculated from the HPLC-DAD data using a 7 mg/mL test

## Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

solution. However, the quantification based on HPLC-DAD data has been carried out by calculating the results obtained for the concentrated solutions (7 mg/mL) relative to the peak area of compound B\_C of the diluted solution which is not accepted. In addition, the applicant should clearly explain the dilution factor used for the calculation and the linearity range (concentrations) of the test substance.

### 3.1.6 Solubility

Water solubility: 0.45 g/L at 20° (flask method OECD 105)

Solubility in mineral oil: 0.01 g/L

Solubility in Phenoxyethanol: 318 g/L

For the determination of the solubility of C-1701 B\_C\_3 in different solvents used for cosmetics the UV filter was weighed in glass vessels and dissolved in the respective cosmetic oil. The mixtures were stirred for 7 days at 25 °C. The solubility data for the UV filter C-1701 B\_C\_3 in solvents used for cosmetics are summarised in Table 3:

**Table 3.**

<b>Solubility of UV filter C-1701 B_C_3 (batch: C-1701 B_C_3/10) in cosmetic ingredients at 25 °C</b>		
<b>Solvent</b>	<b>INCI</b>	<b>Solubility (% w/w)</b>
Protectol PE	Phenoxyethanol	31.8
Spectrasolv DMDA	Dimethyl Capramide	18.6
Transcutol CG	Ethoxydiglycol	18.3
Dottisol	Dimethyl Isosorbide	13.9
Ethanol	Alcohol	13.0
Pelemol BIP-PC	Butylphthalimide and Isopropylphthalimide	9.7
X-Tend 226	Phenethyl Benzoate	7.8
Eldew SL-205	Isopropyl Lauroyl Sarcosinate	7.2
Ronacare AP	Bis-ethylhexyl Hydroxydimethoxy Benzylmalonate	5.2
Uvinul N 539 T	Octocrylene	3.7
1,2-Propandiol	Propylene Glycol	3.3
Oxynex ST	Diethylhexyl Syringylidenemalonate	2.7
Uvinul MC 80	Ethylhexyl Methoxycinnamate	2.1
Tegosoft XC	Phenoxyethyl Caprylate	2.0
Cetiol B	Dibutyl Adipate	1.9
Finsolv EB	Ethylhexyl Benzoate	1.7
Dermofeel TC-7	Triheptanoin	0.58
Dermofeel BGC	Butylene Glycol Dicaprylate/Dicaprante	0.38
Cetiol AB	C12-15 Alkyl Benzoate	0.35
Tegosoft CT	Caprylic/Capric Triglyceride	0.31
Cetiol CC	Dicaprylyl Carbonate	0.15
Lanol 99	Isononyl Isononanoate	0.12
Isopropylpalmitate	Isopropyl Palmitate	0.12
Jojoba Oil	Jojoba Oil	0.03
Cetiol OE	Dicaprylyl Ether	0.02
Cyclomethicone DC345	Cyclomethicone	0.002
Paraffin oil	Mineral Oil	0.002
Nexbase 2006 FG	Hydrogenated Polydecene	0.001

Ref.: 9-10

**SCCS comment**

Solubility in PEG 300 should be provided as this was used for toxicological tests.

**3.1.7 Partition coefficient (Log Pow)**

Log Pow: 1.7 under neutral and alkaline conditions (OECD 117, EEC A.8, GLP)

Ref.: 11

**3.1.8 Additional physical and chemical specifications**

Melting point: 85 -120 °C.

Boiling point: 306- 315 °C

Flash point: 394 °C

Flammability: not flammable

Explosive properties: not explosive

Particle size: D<sub>0.1</sub>= 0.858 µm, D<sub>0.5</sub>= 1.236 µm, D<sub>0.9</sub>= 2.942 µm. The test substance does not contain nanomaterial.

Thermal stability: Decomposition at 390 °C

Vapour pressure: /

Density: /

Viscosity: /

pKa:13.3

Refractive index: /

pH: 5.8/5.9 in a 1% of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate solution in water

UV-vis: λ<sub>max</sub> = 385 nm

Ref.: 11-17

**3.1.9 Stability**

The characterisation of the batches used for toxicological studies showed the homogeneity of test items.

Batch C-1701 B\_C\_3 Lot 0009511412 was stable after being stored for 1 year at 40 °C. Neither active ingredient content nor the content and identity of impurities changed over the considered time interval.

**Table 4.**

<b>Content of C-1701 B_C_3 Lot 0009511412 initially and after one-year storage at 40°C</b>			
Test point	Measurements performed after synthesis ("time zero")	Measurements performed after 1 year storage at 40°C	Principle of Analytical Method
Content of main component B_C_3	98.83 area%	98.73 area%	HPLC/UV
Content of B_C (Mw = 278)	0.93 area%	1.02 area%	HPLC/UV

Homogeneity and stability of C-1701 B\_C\_3 in toxicological test systems (PEG 300) were confirmed in dose formulation analyses conducted as part of e.g. the repeated dose toxicity studies.

Ref.: 1-3, 18

### **SCCS comments on physicochemical characterisation**

Impurities should be quantified for all the batches at  $\lambda_{\text{max}}$ , retention times and HPLC-PDA chromatograms should be provided.

HPLC-MS chromatograms showing the retention time of the main compound and all the impurities, along with information on the % content and retention times of these impurities should be provided.

The applicant should provide the accurate content of 2-ethoxyethanol and 3-methoxypropylamine of all the three batches.

S87 is a secondary amine, and thus is prone to nitrosation and formation of nitrosamines. It should not be used in combination with nitrosating substances. The nitrosamine content should be < 50 ppb.

Solubility in PEG 300 should be provided.

## **3.2 Function and uses**

S87 is proposed to be used as a UV filter in personal care products, including suncare cosmetic formulations at a maximum concentration of 3% w/w.

## **3.3 Toxicological Evaluation**

### **3.3.1 Acute toxicity**

No acute toxicity study was performed on C-1701 B\_C\_3. However, in the existing 14-day and 90-day oral toxicity studies where C-1701 B\_C\_3 was administered at dose levels of 100, 300 and 1000 mg/kg/d in rats, C-1701 B\_C\_3 did not induce any deaths. Hence, it can be assumed that the oral LD50 would be higher than 1,000 mg/kg/d (i.e. the substance is of low acute oral toxicity).

**3.3.2 Irritation and corrosivity****3.3.2.1 Skin irritation****Submission I****EpiDerm™ Skin Irritation Test**

Guideline:	OECD 439 (2010), Commission Regulation (EC) No 761/2009, B.46
Test system:	EpiDerm™ model (0.6 cm <sup>2</sup> )
Replicates:	3 tissues per condition
Test substance:	C-1701 B_C_3 No. 11/0473-3
Test batch:	C-1701/8
Purity:	96.3% (HPLC)
Dose:	25 µl bulk volume (approximately 7 mg) of neat test substance upon tissue wetted with 25 µl phosphate-buffered saline (PBS)
Treatment period:	60 minutes
Post-treatment incubation time:	42 hours
Positive control:	5% (w/v) SDS in deionised water
Negative control:	PBS
Direct interaction with MTT:	Negative
Colouring of tissue:	Yes
GLP:	In compliance
Study period:	July - August 2012

**Methods**

A bulk volume of 25 µl of the solid test material (about 7 mg) was applied onto each of three tissues, wetted with 25 µL of PBS, and homogenously distributed. Control tissues were treated with 30 µl of either the negative control (PBS) or positive control (5% w/v SDS). After 60-minutes treatment (25 minutes at room temperature and 35 minutes in the incubator), the tissues were rinsed with PBS. Following a 42-hour post-treatment incubation period, cell viability was assessed by the MTT assay in which 300 µl of MTT solution was added to the tissues. After a 3-hour incubation period, the MTT solution was removed and the tissues were washed with PBS. The formed formazan was extracted by incubation of the tissues in isopropanol. The optical density was determined spectrophotometrically at 570 nm (OD<sub>570</sub>).

**Results**

The mean viability of the test item-treated tissues was 101%. Yellow discolouration of the tissues was observed after washing. The positive control item demonstrated appropriate sensitivity (relative viability ≤ 20%) of the tissues used under test conditions.

**Table 5.**

<b>Relative viability of EpiDerm™ tissue samples</b>	
<b>Group</b>	<b>Relative viability (mean ± SD, n = 3),[% NC]</b>
NC (PBS)	100 ± 1.31
C-1701 B_C_3 (batch: C-1701/8)	101 ± 20.85 <sup>a</sup>
PC (5% w/v SDS)	3 ± 0.25

n: number of samples, NC: negative control, PBS: Phosphate buffered saline, PC: positive control, SD: standard deviation, SDS: Sodium dodecyl sulfate

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

a: This SD was out of the acceptance limit of  $\leq 20$ . Since all other quality criteria of the test were met and the viability values were well above the cut off for skin irritation, i.e.  $\leq 50\%$ , this deviation was not considered to adversely affect the results of this study.

### Conclusion

The study authors conclude that, under the conditions of this *in vitro* study, C-1701 B\_C\_3 did not show a skin irritation potential in the EpiDerm™ skin irritation test. On the basis of this validated stand-alone *in vitro* test, C 1701 B\_C\_3 is not expected to be irritating to skin at the use concentration and undiluted.

Ref.: 19

### SCCS comment

According to OECD TG 439 (2010) a minimum of  $25 \text{ mg/cm}^2$  should be used in case of solid chemicals. In the study provided, an amount of  $7 \text{ mg}/0.6 \text{ cm}^2$  or  $11.67 \text{ mg}/\text{cm}^2$  of test substance was used i.e. far below the recommended  $25 \text{ mg}/\text{cm}^2$ . In addition, a high variability between sample tissues was observed with a standard deviation between tissue replicates of 20.85, exceeding the recommended maximum acceptable variability of  $SD < 18$ . Due to these shortcomings, SCCS considers that a skin irritation potential of S87 cannot be excluded.

## Submission II

### EpiDerm™ Skin Irritation Test

Guideline:	OECD 439 (2015), Commission Regulation (EC) No 640/2012, B.46
Test system:	EpiDerm™ model ( $0.6 \text{ cm}^2$ )
Replicates:	3 tissues per condition
Test substance:	C-1701 B_C_3 No. 11/0473-5
Test batch:	0009511412
Purity:	99.5%
Dose:	25 mg of neat test substance upon tissue wetted with 25 $\mu\text{l}$ phosphate-buffered saline (PBS)
Treatment period:	60 minutes
Post-treatment incubation time:	42 hours
Positive control:	5% (w/v) SDS in water
Negative control:	PBS
Direct interaction with MTT:	Negative
Colouring of tissue:	No information provided in the study report
GLP:	In compliance
Study period:	May - July 2019

### Methods

25 mg of solid test material (corresponding to about  $39 \text{ mg}/\text{cm}^2$ ) was directly applied onto each of three tissues, previously wetted with 25  $\mu\text{l}$  of PBS, and homogenously distributed so that the tissue surface was uniformly and completely covered. Control tissues were treated with 30  $\mu\text{l}$  of either the negative control (PBS) or positive control (5% w/v SDS). After 60-minutes treatment (25-28 minutes at room temperature and 32-35 minutes in the incubator), the tissues were rinsed with PBS. Following a 42-hour post-treatment incubation period, cell viability was assessed by the MTT assay in which 300  $\mu\text{l}$  of MTT solution was added to the tissues. After a 3-hour incubation period, the MTT solution was removed and the tissues were washed with PBS. The formed formazan was extracted by incubation of the tissues in isopropanol. The optical density was determined spectrophotometrically at 570 nm ( $OD_{570}$ ).

## Results

The relative mean viability of the tissues treated with the test substance was 124.8%. The positive control item showed a relative mean viability of 3.6%, reflecting the expected sensitivity of the tissues. The mean OD<sub>570</sub> of the negative control was within the acceptance criteria.

**Table 6.**

<b>Relative viability of EpiDerm™ tissue samples</b>	
<b>Group</b>	<b>Relative viability (mean ± SD, n = 3), [% NC]</b>
NC (PBS)	100.0 ± 4.2
C-1701 B_C_3 (batch: 11/0473-5)	124.8 ± 5.3
PC (5% w/v SDS)	3.6 ± 0.3 <sup>a</sup>

n: number of samples, NC: negative control, PBS: Phosphate buffered saline, PC: positive control, SD: standard deviation, SDS: Sodium dodecyl sulfate

a: The values for positive controls were slightly out of range of the historic data. Since all other quality criteria of the test were met, this deviation was not considered to have any influence on the validity of the study.

## Conclusion

The study authors conclude that, C-1701 B\_C\_3 did not show a skin irritation potential in the EpiDerm™ skin irritation test under the test conditions used.

Ref.: 20

## SCCS comment

SCCS considers that S87 is not irritating to skin at the use concentration and undiluted.

### 3.3.2.2 Mucous membrane irritation / Eye irritation

## Submission I

### Bovine corneal opacity and permeability test (BCOP test)

Guideline:	OECD 437 (2009), Commission Regulation (EU) No 1152/2010, B.47
Test system:	Fresh bovine corneas
Replicates:	3 Corneae per test condition
Test substance:	C-1701 B_C_3 No. 11/0473-3
Test batch:	C 1701/8
Purity:	96.3% (HPLC)
Test item:	20% (w/v) suspension in deionized water
Test volume:	750 µL
Treatment period:	4 hours at about 32 °C
Positive control:	20% (w/v) imidazole in deionised water
Negative control:	Deionised water
GLP:	In compliance
Study period:	July - August 2012

## Methods

Freshly isolated bovine eyes from 12-16 month old donor cattle were collected from the slaughterhouse and examined for defects. Those presenting defects such as opacity,

scratches, pigmentation etc. were discarded. The corneae were carefully removed from the eyes and mounted in a holder. After a first basal opacity measurement of the fresh bovine corneae, 750 µL of the test item, the positive and the negative controls were applied onto the corneae and incubated for 4 hours at about 32 °C. After the incubation phase, the test item, the positive and the negative controls were each rinsed from the corneae and the opacity was measured again. Thereafter, permeability of the corneae was determined by measuring spectrophotometrically at 490 nm the transfer of 0.5% (w/v) sodium fluorescein upon incubation in a horizontal position for 90 minutes at about 32 °C.

## Results

The IVIS value of C 1701 B\_C\_3 did not indicate a test item-related risk of serious damage to eyes. The PC item demonstrated appropriate sensitivity (IVIS value within 2 SD of the laboratory's historical mean value, i.e. 87.7-144.2) of the test system.

**Table 7.**

<b><i>In vitro</i> irritancy score (IVIS) for C-1701 B_C_3</b>			
<b>Group</b>	<b>Mean opacity (± SD; n = 3)<sup>a</sup></b>	<b>Mean permeability (± SD; n = 3)<sup>a</sup></b>	<b>IVIS (± SD; n = 3)</b>
C-1701 B_C_3 (20% aqueous solution)	5.5 ± 1.6	- 0.004 ± 0.002	5.4 ± 1.6
NC (deionised water)	1.5 ± 3.2	0.201 ± 0.358	4.5 ± 3.9
PC (20% w/v imidazole)	72.2 ± 6.4	3.847 ± 0.959	129.9 ± 16.4

n: number of samples, NC: negative control, PC: positive control, SD: standard deviation

<sup>a</sup>: A NC correction was not performed for PC and test item. The mean permeability score of the NC was out of the historical range, because the value of a single cornea was exceptionally high. Due to the unambiguous results of the test item group even without NC subtraction and because all other acceptance criteria were met, the evaluation of the study was not considered influenced by this deviation.

## Conclusion

The study authors conclude that, under the conditions of this study, C-1701 B\_C\_3 does not cause serious eye damage.

Ref.: 21

## SCCS comment

SCCS notes that due to an outlier, negative control values were not within the historical range. Consequently, negative control corrections for permeability and opacity measurements were not performed for results obtained for the positive control and the test substance. Based on the unambiguous results of the study, even without background corrections, the SCCS has accepted that S87 does not cause serious eye damage. However, a mild or moderate eye irritation potential cannot be excluded.

## EpiOcular™ eye irritation test

Guideline:

MatTek, Epiocular™ human cell construct: Procedure details version 3.1a; Harbell J.W. et al. (2009): COLIPA Program on Optimization of Existing *In Vitro* Eye Irritation Assays for Entry into Formal Validation: Technology Transfer and Intra/Inter Laboratory Evaluation of EpiOcular Assay for Chemicals, Poster #378, Society of Toxicology March 2009

Test system:

EpiOcular™ human cornea model (0.6 cm<sup>2</sup>)

Replicates:

2 tissues per condition

Test substance:

C-1701 B\_C\_3 No. 11/0473-3

## Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

Test batch:	C-1701/8
Purity:	96.3% (HPLC)
Dose:	50 µl bulk volume (approximately 8 mg) neat test substance upon tissue wetted with 20 µl PBS
Treatment period:	90 minutes
Post-treatment incubation time:	18 hours
Positive control:	Methyl acetate
Negative control:	Deionised water
Direct interaction with MTT:	Negative
Colouring of tissue:	Yes
GLP:	In compliance
Study period:	July - August 2012

**Methods**

Approximately 8 mg test item was applied onto the tissues, which were wetted with 20 µl PBS and incubated for 30 minutes. In parallel, 50 µl of the negative and positive control were handled in the same manner. The treated tissues were placed in the incubator for 90 minutes. After incubation, the tissues were rinsed with PBS to remove any residual test material and incubated for another 18 hours at standard culture conditions. Cell viability was next measured with the MTT assay. Here the medium was replaced by 300 µl of MTT solution. After a 3-hour incubation period, the MTT solution was removed and the tissues were washed with PBS. The formed formazan was extracted by incubation of the tissues in isopropanol at room temperature overnight or for at least 2 hours on a plate shaker. The optical density was determined spectrophotometrically at 570 nm (OD<sub>570</sub>).

**Results**

The mean viability of the test item-treated tissues was 104%, determined after an exposure period of 90 minutes with about 18 hours post-incubation. Yellow discolouration of the tissues was observed after washing. The positive control item demonstrated appropriate sensitivity (relative viability < 50%, expected tissue viability of approximately 25%) of the tissues used under test conditions.

**Table 8.**

Relative viability of EpiOcular™ tissue samples		
Group	Relative viability	
	Mean (n = 2) [% of NC]	Inter-tissue variability [%]
NC (water)	100	8.7
C-1701 B_C_3 (batch: C-1701/8) 100%	104	0.7
PC (Methyl acetate)	16	0.9

n: number of samples, NC: negative control, PC: positive control

**Conclusion**

The study authors conclude that, under the experimental conditions employed, C-1701 B\_C\_3 did not show an eye irritation potential.

Ref.: 22

**SCCS comment**

This study was performed prior to the acceptance of the official OECD TG 492 guideline for the EpiOcular™ test. However, an amount of 8 mg/0.6 cm<sup>2</sup> or 13.33 mg/cm<sup>2</sup> of S87 was applied on the tissue surface, being too low to accurately predict eye irritation potential.

## Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

Due to these shortcomings, SCCS considers that the potential of S87 to be irritating to the eye cannot be excluded.

**Submission II****Bovine corneal opacity and permeability test (BCOP test)**

Guideline:	OECD 437 (2017)
Test system:	Fresh bovine corneas
Replicates:	3 Corneas per test condition
Test substance:	E212657
Test batch:	0009511412
Purity:	99.4%
Test item:	3% (w/v) in 50% (w/w) DMSO in pure water (yielding a pH of 5.8)
Vehicle:	50% (w/w) DMSO in pure water
Test volume:	750 ± 8 µl
Treatment period:	10 ± 1 minutes at 32 ± 1 °C
Post-treatment incubation time:	2 hours ± 10 minutes at 32 ± 1 °C
Positive control:	10% (w/w) NaOH in pure water
Negative control:	0.9% (w/v) NaCl in pure water
GLP:	In compliance
Study period:	July 2019

**Methods**

Bovine eyes (from cattle 6-8 months old) were collected at slaughterhouses and prepared within 4 hours of collection. Eyes that were too big or that had defects were rejected. The corneas were carefully removed from the eyes and mounted in a holder and incubated for at least 1 hour at 32 ± 1 °C. After a first basal opacity measurement of the fresh bovine corneas, 750 µl of the test item, positive, negative and vehicle control were applied onto the corneas for 10 ± 1 minutes. At the end of the contact period, corneas were rinsed and incubated for an additional 2 hours at 32 ± 1 °C. After the post-exposure incubation period, the opacity was measured again. Thereafter, permeability of the corneas was determined by measuring spectrophotometrically at 490 nm the transfer of 0.4% (w/v) sodium fluorescein upon incubation for 90 ± 5 minutes at 32 ± 1 °C.

**Results**

All the validation criteria were met and the calculated IVIS values are summarized in the Table below. After 10 minutes of contact, the IVIS value of C-1701 B\_C\_3 diluted at 3% is quite similar to the vehicle control.

**Table 9.**

<b><i>In vitro</i> irritancy score (IVIS) for C-1701 B_C_3</b>			
<b>Group</b>	<b>Mean opacity (± SD; n = 3)<sup>a</sup></b>	<b>Mean permeability (± SD; n = 3)<sup>a</sup></b>	<b>IVIS (± SD; n = 3)</b>
C-1701 B_C_3 (3% w/w in 50% DMSO)	0.3 ± 0.0	0.009 ± 0.005	0.5 ± 0.1
Negative control (0.9% NaCl)	0.7 ± 0.6	0.001 ± 0.002	NA
Vehicle control (50% DMSO)	0.3 ± 1.0	0.009 ± 0.007	0.5 ± 1.0
PC (10% w/w NaOH)	140.7 ± 5.8	5.989 ± 0.217	230.5 ± 7.2

n: number of samples, NA: not applicable, NC: negative control, PC: positive control, SD: standard deviation

## Conclusion

The study authors conclude that, under the conditions of this study, C-1701 B\_C\_3 diluted at 3% (w/w) in 50% DMSO does not cause serious eye damage and can be classified as "no category".

Ref.: 23

## SCCS comment

The SCCS agrees with the conclusions of the Applicant.  
However, historical data for negative and positive controls are not provided.  
The IVIS score for the negative control is not provided either.

## EpiOcular™ eye irritation test

Guideline:	OECD 492 (2018)
Test system:	EpiOcular™ human cornea model (0.6 cm <sup>2</sup> )
Replicates:	2 tissues per condition
Test substance:	C-1701 B_C_3 No. 11/0473-5
Test batch:	0009511412
Purity:	99.5%
Dose groups:	ca. 50 mg neat test substance, 50 µl bulk volume (ca. 8 mg) neat test substance, 50µl of a 3% (w/w) suspension of test substance in deionized water
Treatment period:	6 hours
Post-treatment incubation time:	18 hours
Positive control:	Methyl acetate
Negative control:	Deionised water
Direct interaction with MTT:	Negative
Colouring of tissue:	Yes
GLP:	In compliance
Study period:	May - July 2019

## Methods

Approximately 50 mg or 8 mg of neat test substance or 50µl of a 3% (w/w) suspension of the test substance in deionized water were applied onto the tissues, which were pre-wetted with 20 µl PBS and incubated for 30-34 minutes. In parallel, 50 µl of the negative and positive control were handled in the same manner. The treated tissues were placed in the incubator for 6 hours. After incubation, the tissues were rinsed with PBS to remove any residual test material and incubated for another 18 hours at standard culture conditions. Cell viability was next measured with the MTT assay. Here the medium was replaced by 300 µl of MTT solution. After a 3-hour incubation period, the MTT solution was removed and the tissues were washed with PBS. The formed formazan was extracted by incubation of the tissues in isopropanol at room temperature overnight or for at least 2 hours on a plate shaker. The optical density was determined spectrophotometrically at 570 nm (OD<sub>570</sub>).

## Results

The relative mean viability of the tissues treated with ca. 50 mg or 8 mg of the test substance was 93.5% and 106.5%, respectively. The relative mean viability of the tissues treated with 50 µl of a 3% (w/w) suspension in water was 103.6%. Application of the negative and positive control showed a relative viability of 21.9%. Slight or moderate residues (light yellowish coloured) remained on the tissues treated with 8 mg or 50 mg test substance after the washing procedure. However, this did not interfere with the MTT assay as the test substance was not able to reduce MTT directly.

**Table 10.**

<b>Relative viability of EpiOcular™ tissue samples</b>		
<b>Group</b>	<b>Relative viability</b>	
	<b>Mean (n = 2) [% of NC]</b>	<b>Inter-tissue variability [%]</b>
NC (water)	100	8.8
C-1701 B_C_3 (batch: 11/0473-5) 100% ca. 50 mg	93.6	13.5
C-1701 B_C_3 (batch: 11/0473-5) 100% ca. 8 mg	106.5	2.9
C-1701 B_C_3 (batch: 11/0473-5) 50 µl 3% (w/w) in water	103.6	12.3
PC (Methyl acetate)	21.9	6.7

n: number of samples, NC: negative control, PC: positive control

### Conclusion

The study authors conclude that, under the test conditions chosen, C-1701 B\_C\_3 did not show an eye irritation potential.

Ref.: 24

### SCCS comment

On the basis of this study, the SCCS considers that S87 is not irritating to the eye at the use concentration and undiluted.

### 3.3.3 Skin sensitisation

#### Non-Radioactive Murine Local Lymph Node Assay (LLNA)

Guideline:	OECD 442B (2010),
Species/strain:	Female CBA/J mice
Group size:	2 animals/group (pre-test); 5 animals/group (main test)
Test substance:	C-1701 B_C_3
Batch:	1442/3+4
Purity:	100 area-% (HPLC)
Vehicle:	N,N-dimethylformamide (DMF)
Concentration:	10, 25 and 50 w/v%
Positive control:	25 vol % α-hexyl cinnamic aldehyde (HCA)
GLP:	In compliance
Study period:	October 2011 - January 2012

### Methods

The concentrations used for the main test were based on a preliminary study using concentrations of 10, 25 and 50% (w/v), in which no clinical signs and no appreciable changes in body weights or auricular thickness were noted.

The test item was applied once daily at concentrations of 10, 25 and 50% to the outside of both ears (25 µL/ear for three consecutive days (days 1-3). Concurrent vehicle (DMF) and positive control items (25% (v/v) HCA in DMF) were applied in the same manner. On day 5, Bromodeoxyuridine (BrdU) was administered intraperitoneally (*i.p.*) to all animals at a dose level of 5 mg/animal. All animals were sacrificed on day 6. The ears were observed and

scored for erythema and/or edema. Then the auricular lymph nodes were excised for lymph node weight determination and for subsequent assessment of BrdU incorporation by means of flow cytometry. The number of BrdU-positive cells was calculated for each animal by multiplying the lymphocyte count by the ratio of BrdU-positive lymphocytes and the stimulation index (SI) was calculated for each treated group.

## Results

No clinical signs, including skin irritation at the application area, were observed in any animal in the test item-treated or vehicle control group. No appreciable body weight changes were observed. In the positive control group, very slight erythema was observed in both ear auricles of all animals at approximately 1 hour after application on days 2 and 3 only.

The SI values were 1.1, 1.0 and 1.0 in the low-, mid- and high-dose groups (10, 25 and 50% (w/v)), respectively. Relevant increases in the ratio and count of BrdU-positive lymphocyte cells were noted in the Positive control group as compared to the Vehicle control group. The SI value in the Positive control group was 7.4, indicating a positive response and an adequate sensitivity of the test system.

## Conclusion

Based on the study results, C-1701 B\_C\_3 in N,N-Dimethylformamide was considered not to possess any skin sensitising potential under the experimental conditions employed. Therefore, C-1701 B\_C\_3 is not considered to be a skin sensitisier.

Ref.: 25

## SCCS comment

The LLNA:BrdU-ELISA uses a different cut-off than the traditional LLNA. In this non-radioactive LLNA, a substance is considered a skin sensitisier when the  $SI \geq 1.6$  (OECD TG442B). However, using this criterion, S87 can still be regarded as having no skin sensitisation potential.

### 3.3.4 Toxicokinetics

#### 3.3.4.1 Dermal / percutaneous absorption

##### *In vitro* percutaneous absorption

Guideline:	OECD 428 (2004), OECD No. 28 (2004), SCCS/1358/10, SCCS NoG 6 <sup>th</sup> rev. (2006), COLIPA (1997)
Test system:	Split thickness human skin samples (200-400 µm)
Number of donors:	12 samples from 4 donors (25 to 48 years)
Membrane integrity:	Electrical resistance barrier integrity test, membranes with a resistance < 4 kΩ were excluded
Test substance:	C-1701 B_C_3
Batch:	C-1701/8
Purity:	96.3% (NMR)
Test item:	Commercial suncare formulation 758455 5, batch no. R2, containing 3% (w/w) C-1701 B_C_3
Dose applied:	2 mg/cm <sup>2</sup> of the test preparation (approx. 0.06 mg C-1701 B_C_3/cm <sup>2</sup> , total dose approx. 0.19 mg)
Exposed area:	3.14 cm <sup>2</sup>
Exposure period:	24 hours
Sampling period:	24 hours (0, 0.5, 1, 2, 4, 8 and 24 hours post dose)
Receptor fluid:	5% w/v bovine serum albumin in PBS
Solubility in receptor	

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

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fluid:	0.207 mg/mL
Mass balance analysis:	Provided
Tape stripping:	Yes (20 strips in total; 4 pools of 5 strips each)
Method of Analysis:	LC-MS/MS
GLP:	In compliance
Study period:	December 2012 - January 2013

### Methods

Split-thickness human skin (12 samples from 4 individual donors) was mounted into static diffusion cells containing receptor fluid (Phosphate buffered saline (PBS) supplemented with bovine serum albumin (BSA); 5% w/v) in the receptor chamber. The skin surface temperature was maintained at  $32 \pm 1$  °C throughout the experiment. An electrical resistance barrier integrity test was performed and any human skin sample exhibiting a resistance < 4 kΩ was excluded from absorption measurements. No samples were rejected. The suncare formulation was applied to the mounted human skin samples at an application rate of approximately 2 mg/cm<sup>2</sup>. This quantity, as low as technically applicable, can be considered as a good representation of the use conditions.

The skin surface temperature was maintained at  $32 \pm 1$  °C throughout the experiment. Exposure was terminated at 24 hours post dose by washing the skin surface rinsed twice with an aqueous solution of Sodium dodecyl sulfate (SDS, 2% w/v) and then twice with water, to reflect in-use conditions. For each washing step, the skin wash was aspirated with a pipette and the skin was dried with a tissue-paper swab. An additional tissue-paper swab was used after the last water rinse. The soap and water were retained for analysis in a single pooled sample (skin wash). The pipette tips and tissue-paper swabs were retained. The cells were dismantled and the donor chamber retained for analysis (donor chamber wash). The underside of the skin was dried with additional tissue swabs. The receptor chambers were emptied, and bulk receptor fluid retained. The chambers were rinsed with methanol (40 mL) and the wash retained (receptor wash). The skin was divided into exposed skin and unexposed skin (i.e. the area of skin under the cell flange). The *stratum corneum* was removed from the skin by tape stripping. Afterwards, the epidermis was separated from the dermis by the heat separation technique. Exposed skin, unexposed skin, skin washes, tissue swabs, pipette tips and tape strips were extracted in a suitable solvent and all samples were analysed by LC-MS/MS. All cumulative receptor fluid values were calculated from data which included values less than the lower limit of quantification (LLOQ, 1 ng/mL). Any receptor fluid value below the LLOQ was assigned the nominal value of the LLOQ (1 ng/mL), representing the "worst-case" result for absorbed test item. Values below the LLOQ were observed up to 2-4 hours post dose. The solubility of the test item in the receptor fluid was not rate limiting for absorption.

### Results

The distribution and the absorption of the test item are summarised in the following Table 11.

**Table 11.**

<b>Distribution/absorption of C-1701 B_C_3 (batch: C-1701/8) 24 hours after application in a typical suncare formulation (3% w/w<sup>a</sup>) to split-thickness human skin</b>		
<b>Distribution</b>	<b>Fraction of applied dose mean ± SD (n = 12) [%]</b>	<b>Amount mean ± SD (n = 12) [µg/cm<sup>2</sup>]</b>
Total dislodgeable dose	93.73 ± 5.48	61.79 ± 3.61
<i>Stratum corneum</i>	0.79 ± 0.46	0.52 ± 0.30
Epidermis (without <i>stratum corneum</i> )	0.57 ± 0.48	0.37 ± 0.32
Dermis	0.35 ± 0.41	0.23 ± 0.27
Total unabsorbed dose	94.71 ± 5.06	62.44 ± 3.34
Total absorbed dose	0.72 ± 0.63	0.48 ± 0.42
<b>Dermal delivery</b>	<b>1.63 ± 1.02</b>	<b>1.08 ± 0.67</b>
Mass balance	96.34 ± 4.57	63.51 ± 3.01

<sup>a</sup>: nominal concentration; a test item concentration of 3.23% (w/w) was determined by LC-MS/MS  
n: number of samples, SD: standard deviation

Total dislodgeable dose: donor chamber wash + skin wash + tissue swabs + pipette tips

Total unabsorbed dose: total dislodgeable dose + *stratum corneum* + unexposed skin

Total absorbed dose: cumulative receptor fluid + receptor rinse + receptor chamber wash

Dermal delivery: total absorbed dose + dermis + epidermis (without *stratum corneum*);

Mass balance: total unabsorbed dose + epidermis (without *stratum corneum*) + dermis + total absorbed dose

## Conclusion

Under the conditions of this *in vitro* study, C-1701 B\_C\_3 in a representative suncare cosmetic formulation at the concentration of 3% (w/w) penetrated through split-thickness human skin to a low extent. At 24h post dose, the amount considered as absorbed was estimated to be at maximum 1.08 ± 0.67 µg/cm<sup>2</sup> corresponding to 1.63 ± 1.02% of the applied dose.

Ref.: 26

## SCCS comment

The dermal absorption study was performed adequately. The SCCS has therefore decided to use the mean +1SD (1.63%+1.02=2.65% or 1.08+0.67 µg/cm<sup>2</sup>=1.75 µg/cm<sup>2</sup>) for MoS calculations.

### 3.3.4.2 Other studies on toxicokinetics

## 3.3.5 Repeated dose toxicity

### 3.3.5.1 Repeated Dose (28 days) oral / dermal / inhalation toxicity

#### Repeated Dose (14 days) oral toxicity

Guideline: /

Species/strain: Rat, Grl:Wi (Han)

Group size: 5/sex/dose

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

Test substance: C-1701 B\_C\_3  
Batch: 1442/3+4  
Purity: 98.8%; dose calculations were not corrected for purity  
Vehicle: Polyethylene glycol 300  
Dose levels: 0, 100, 300 or 1000 mg/kg bw/day  
Dose volume: 5 mL/kg bw  
Route: oral  
Administration: gavage  
Duration: 14 days  
GLP: in compliance  
Study period: October 2011- May 2013 (in life phase ended August 2012)

Animals received test substance for 14 days. During the treatment period all animals were assessed repeatedly for mortality and clinical signs of toxicity. Body weights and food consumption were recorded at regular intervals. On the day of scheduled necropsy, urine samples were collected after overnight fasting and blood samples were taken for the assessment of haematology and clinical chemistry parameters. At necropsy, all animals were examined macroscopically and selected organ weights were determined. Organs/tissues of all high dose group and control group animals were processed and examined microscopically for histopathological findings. The dose formulations used in this study were analysed for test item concentration and homogeneity.

## Results

Stability analyses demonstrated that the test item is stable in PEG 300 at room temperature and protected from light for 24 hours and under refrigerated conditions (2-8 °C) and protected from light for 10 days at concentrations bracketing those used in the present study. All dose formulations used in this study were formulated appropriately and remained within the concentration acceptance criterion (*i.e.*, difference between analytically determined mean concentration and nominal concentration ≤ 15%). Homogeneity testing showed that the formulation technique used produced homogenous dose formulations.

No mortalities and no toxicologically relevant test item-related changes in haematology, clinical chemistry and urinalysis parameters were observed. Except for the liver, no relevant test item-related changes in organ weights were noted on the day of scheduled necropsy. Macroscopical and histopathological examinations revealed no adverse test item-related gross lesions or microscopic findings in both male and female rats. Treatment of male rats with the test item resulted in clinical signs (discoloured fur, mild to moderate dehydration, mild to moderate excess salivation, hunched posture, rales, decreased motor activity, swelling in the axillary region and ptosis), reductions in body weight gain and food consumption, and increased liver weights at the high-dose level of 1000 mg/kg bw/day. Females at the same dose level showed clinical signs (discoloured fur, mild dehydration, urine-stained abdominal fur and chromorhinorrhea) and increased liver weights. Increased liver weights were also seen in females treated at 300 mg/kg bw/day.

In the absence of concomitant macroscopical and histopathological findings, the increased liver weights noted in both sexes at 1000 mg/kg bw/day and in females also at 300 mg/kg bw/day were not considered adverse.

## Conclusion

Under the conditions of this dose range-finding toxicity study, the NOAEL for C-1701 B\_C\_3 was established at 300 mg/kg bw/day for male and female rats. Dose levels of 100, 300 and 1000 mg/kg bw/day were selected for the subsequent 90-day repeated dose oral toxicity study in rats.

Ref.: 27

### 3.3.5.2 Sub-chronic (90 days) oral / dermal / inhalation toxicity

#### Oral

Guideline: OECD 408; US EPA OPPTS 870.3100  
Species/strain: Wistar (Crl:WI(Han)) rats  
Group size: 10 /sex/group

Test substance: C-1701 B\_C\_3  
Batch: C-1701/8  
Purity: 96.3% (<sup>1</sup>H-NMR)  
Vehicle: Polyethylene glycol 300  
Dose levels: 0, 100, 300 or 1000 mg/kg bw/day  
Dose volume: 5 mL/kg bw  
Route: oral  
Administration: gavage  
Duration: 90 days  
GLP: in compliance  
Study period: May 2012- May 2013 (in life phase ended August 2012)

During the treatment period, animals were observed for mortality, general clinical observations, detailed observations, body weight and food consumption at defined intervals. Functional observation battery (FOB) and locomotor activity assessments were performed in week 12. Vaginal lavage samples were collected daily for the last 28 days of the treatment period and on the day of scheduled necropsy for estrous cycle evaluations. Ophthalmological examinations were conducted on all animals, once during the acclimatisation period and once prior to scheduled necropsy. Blood samples for clinical pathology examinations, haematology and clinical chemistry parameters were collected on the day of scheduled necropsy from all rats after an overnight fasting period. For the assessment of urinalysis parameters, only urine from female animals (obtained after overnight fasting on the day of necropsy) was taken. On the day of scheduled necropsy, all animals were examined macroscopically and the weights of selected organs were determined. Full histopathology was performed on the preserved organs/tissues of all premature decedents and of the animals of the control and high dose groups. Due to lesions observed in high-dose group animals, the liver was also examined microscopically in low- and mid-dose group animals. All gross lesions of all animals were examined. Male reproductive assessments were conducted including sperm motility, sperm concentration, sperm morphology and spermatid counts. The dose formulations used in this study were analysed for test-item concentration and homogeneity using a validated HPLC method. Stability analyses demonstrated that the test item is stable in PEG 300 at room temperature and protected from light for 24 hours and under refrigerated conditions (2-8 C) and protected from light for 10 days at concentrations bracketing those used in the present study.

#### Results

Analysis of the dose formulations used in this study revealed all actual concentrations were within the acceptance criteria of  $\pm 15\%$  of the nominal concentrations. All dose formulation samples met acceptance criteria for homogeneity (the relative standard deviation [RSD] of concentrations was < 5% for each group).

Daily test item administration at 1000 mg/kg bw/day resulted in clinical signs, consisting of urine-stained abdominal fur, increased incidence of dehydration and excess salivation. Body weight gains were slightly lower in males as compared with concurrent controls. After the start of the study, food consumption was slightly and transiently decreased in males and females. The bilirubin test in urine was positive for the female rats. Haematological and

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

clinical chemistry examinations mainly revealed slight decreases in red blood cell parameters (haemoglobin concentration and haematocrit in males, mean corpuscular haemoglobin concentration (MCHC) in females, mean corpuscular haemoglobin (MCH) and mean corpuscular volume (MCV) in both sexes) and increased reticulocyte counts and bilirubin concentrations in both sexes. Leukocyte and lymphocyte counts were slightly increased in the female rats. Liver weights were moderately increased in males and females, with minimal centrilobular hepatocellular hypertrophy as histopathological correlate noted in 5/10 males and 8/10 females. There were statistically significant changes in other organ weights, but no patterns, trends, or associated microscopic findings to identify them as being toxicologically relevant. Slightly lower testicular spermatid count and spermatid density occurred in the male rats; however, these differences were not considered to be adverse because there were no corresponding reductions in absolute testicular weights and no microscopic correlations in testicular histology.

At 300 mg/kg bw/day, urine-stained abdominal fur and increased incidence of dehydration were noted in males and females. Minor differences occurred in single haematology parameters, but without consistency across genders. The bilirubin test in urine was positive for the female rats. These findings were not considered adverse. Liver weights were slightly increased in both sexes, but without any histopathological correlates or any evidence of an impaired organ function by clinical chemistry parameters. Therefore, these liver weight changes were not considered adverse, but to be a test item-related adaptive response.

Following test item administration at 100 mg/kg bw/day, dehydration was observed in 3/10 females and the bilirubin test in the urine was positive in female rats. In the absence of any other effects, these differences from controls were not considered to be adverse. No test item-related effects were observed in the male rats.

### **Conclusion**

Under the conditions of this study, the No Observed Adverse Effect Level (NOAEL) for C-1701 B\_C\_3 was established at 300 mg/kg bw/day for male and female rats. C-1701 B\_C\_3 was found to be of low toxicity and no adverse effects on male/female reproductive organs have been observed after repeated administration for 90 days *via* gavage.

Ref.: 18

### **SCCS comment**

Administration of S87 by oral gavage to rats once a day for 90 days at a dose of 1000 mg/kg/day resulted in no test article-related gross findings, although liver weight changes with associated microscopic liver findings (centrilobular hypertrophy) and modifications in haematological parameters were observed. There were statistically significant changes in other organ weights, but there were no patterns, trends or associated microscopic findings to identify them as being toxicologically relevant. Administration of S87 by oral gavage to rats once a day for 90 days at a dose of 100 or 300 mg/kg/day resulted in no test article-related gross findings. Organ weight changes in liver (increased) were observed only in females at the 300 mg/kg/day dose level but there were no microscopic findings in the liver. Therefore, the SCCS agrees with the NOAEL of 300 mg/kg/day.

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

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### 3.3.6 Reproductive toxicity

#### 3.3.6.1 Fertility and reproduction toxicity

##### Reproduction/developmental screening study in rats

Guideline: OECD 421; US EPA OPPTS 870.3550  
Species/strain: Rat/Crl:WI(Han)  
Group size: 10/sex/dose (a total of 80 rats)  
Test substance: C-1701\_B\_C\_3 suspended in polyethylene glycol 300  
Batch: C-1701/8  
Purity: 96.3% ( $^1\text{H-NMR}$ ); dose calculations were not corrected for purity  
Dose levels: 0, 100, 250 or 700 mg/kg bw/day  
Dose volume: 5 mL/kg bw  
Route: Oral  
Exposure period: 14 days prior to cohabitation, through cohabitation, and continuing through the day before necropsy for male rats or through day 4 of lactation (DL4) for females rats that delivered a litter.  
GLP: in compliance  
Study period: June 2012-May 2013 (in life phase ended August 2012)

This screening study was designed to provide initial information on possible effects on reproduction and/or development, either at an early stage of assessment of toxicological properties of a compound. This test was not designed to provide complete information on all aspects of reproduction and development.

The choice of tested doses was based on a range-finding maternal toxicity study (Carlson M.B. (2013), CRL study number 20027339) in pregnant Crl:WI(Han) female rats at dose levels of 0 (vehicle control), 100, 300 and 1000 mg/kg bw/day on gestation days 6-20. In this range-finding study, clinical signs such as urine-stained abdominal fur, slight to moderate excess salivation and ungroomed coat occurred in a generally dose-dependent manner in each of the dose groups. Additionally, dehydration, piloerection, discolored urine, soft or liquid feces, hunched posture, scant feces, decreased motor activity, and discolored fur occurred in the 300 and/or 1000 mg/kg bw/day whereas ptosis, thin body condition, and hyperpnoea occurred in a single rat at 1000 mg/kg bw/day. Maternal body weights/changes, food consumption, gravid uterine weights and terminal body weights were reduced and absolute and relative liver weights were increased in the 1000 mg/kg bw/day group. On the basis of the observed effects, the dose level of 700 mg/kg bw/day was expected to produce maternal toxicity.

Dose formulation and control substance, PEG 300, were administered for 14 days prior to cohabitation, throughout cohabitation and continuing through the day before necropsy for male rats or through day 4 of lactation (DL4) for female rats that delivered a litter. Female rats that did not deliver a litter were euthanised on an estimated day 25 of gestation (DG 25).

A complete necropsy was performed in the main study on all parental (P) generation rats, and selected tissues were weighed, retained and processed for histopathological examination. All surviving filial (F1) generation pups were euthanised on postnatal day 5 (PND 5), and examined for gross lesions. In this study, mortality (P and F1 generations), clinical signs (P and F1 generations), body weights (P and F1 generations), feed consumption, estrous cyclicity, mating and fertility parameters, natural delivery, litter observations, macroscopic findings (P and F1 generations), selected organ weights and microscopic findings (incl. sperm staging in males) were assessed.

Dose formulation samples were collected for concentration and homogeneity analysis by means of a HPLC method. Stability analyses were performed and demonstrated that the test item is stable in the vehicle at room temperature and protected from light for 24 hours and under refrigerated conditions (2-8 °C) and protected from light for 10 days at concentrations bracketing those used in the present study.

## Results

Analysis of dose formulation samples revealed accurate preparation. The test item was homogeneously distributed in the vehicle.

Administration of the test item at dose levels of 100, 250 and 700 mg/kg bw once daily by oral gavage resulted in urine-stained abdominal fur in male and female rats. Mean body weight gains were slightly decreased (53% of the control group mean value) during the first week of study (days 1-8) in parental (P) generation male rats at 700 mg/kg bw/day. In P generation female rats at the same dose level, mean body weight gains were slightly decreased (83% of the control group mean value) throughout the overall gestation period (gestation days 0-20). Mean food consumption values were slightly decreased (90 to 88% of the control group mean value) during the first week in P generation male and female rats and the first week of pregnancy (gestation days 0-7; 93 to 92% of the control group mean value) in female rats at 700 mg/kg bw/day.

There were no test item-related effects on estrous cycle, mating and fertility parameters, gestation and lactation. Reproductive organ weights were not altered by the administration of the test item.

Mean pup weights per litter on DLs 1 and 5 were slightly reduced (9 and 14% reduction, relative to control group mean values, respectively) in the 700 mg/kg bw/day group (reflecting decreased body weight change in P generation females during gestation (17% reduction, relative to the control group mean value) and also the slightly higher mean litter size (11.2 versus 10.4 in the control group)). It is known from literature (Fleeman *et al.*, 2005) that reductions in fetal body weights frequently occur concurrent with reduced maternal food consumption and maternal body weights, as seen in the current study results.

Histopathological examinations did not reveal any test item-related effects. There were no adverse clinical signs or gross lesions in the F1 generation pups attributed to administration of the test item to the P generation dams.

## Conclusion

Under the conditions of this study, the NOAEL for parental toxicity of C-1701 B\_C\_3 was considered to be 250 mg/kg bw/day given the signs observed at the highest tested dose (urine-stained abdominal fur, mean body weight gains and slightly decreased mean food consumption values).

The NOAEL for reproductive toxicity was considered to be 250 mg/kg bw/day, based on the reductions in mean pup weights per litter at 700 mg/kg bw/day, which were probably related to maternal toxicity, as the reductions in pup weights were concurrent with decreased maternal body weights and a slightly higher litter size. Further, these reductions in mean pup weights per litter were not observed in the lower dose groups, where evidence of maternal toxicity was not apparent.

Based on the study results, C-1701 B\_C\_3 did not display adverse effects on reproduction parameters.

Ref.: 28-29

### **SCCS comment**

SCCS agrees with a NOAEL of 250 mg/kg bw/day for the parental toxicity as well as for the reproductive toxicity.

#### **3.3.6.2 Developmental toxicity**

Guideline:	OECD 414
Species/strain:	Rat/ Crl:WI(Han)
Group size:	25 pregnant female rats/group (a total of 100 rats)
Test substance:	C 1701 B_C_3
Batch:	C-1701/8
Dose levels:	0, 100, 250 and 700 mg/kg bw/day on GDs 6-20
Dose volume:	5 mL/kg bw
Route:	Oral gavage
Exposure period:	from gestation day 6 to gestation day 20
Positive control:	
GLP:	In compliance
Study period:	April 2012- May 2013 (in life phase ended August 2012)

### **Methods**

The choice of tested doses was based on a range-finding maternal toxicity study (Carlson M.B. (2013), CRL study number 20027339) in pregnant Crl:WI(Han) female rats at dose levels of 0 (vehicle control), 100, 300 and 1000 mg/kg bw/day on DGs 6-20. In this range-finding study clinical signs such as urine-stained abdominal fur, slight to moderate excess salivation and ungroomed coat occurred in a generally dose-dependent manner in each of the dose groups. Additionally, dehydration, piloerection, discolored urine, soft or liquid feces, hunched posture, scant feces, decreased motor activity, and discolored fur occurred in the 300 and/or 1000 mg/kg bw/day whereas ptosis, thin body condition, and hyperpnoea occurred in a single rat at 1000 mg/kg bw/day. Maternal body weights/ changes, food consumption, gravid uterine weights and terminal body weights were reduced and absolute and relative liver weights were increased in the 1000 mg/kg bw/day group. On the basis of the observed effects, the dose level of 700 mg/kg bw/day was expected to produce maternal toxicity and the dose levels of 100, 250 and 700 mg/kg bw/day were selected for the main prenatal developmental toxicity study.

All female rats were euthanised on DG 21 and examined for ovarian and uterine contents, and a gross necropsy of the thoracic, abdominal, and pelvic viscera was performed blind to dose group. The following parameters and end points were evaluated: viability, clinical signs, body weights, body weight changes, food consumption, mating performance, gross observations, ovarian and uterine contents, gravid uterine weights, and fetal sex, fetal body weights, and fetal gross external, soft tissue, and skeletal alterations, as well as ossification site averages. Dose formulation samples were collected for concentration and homogeneity analysis by means of a HPLC method.

Stability analyses demonstrated that the test item is stable in the vehicle at room temperature and protected from light for 24 hours and under refrigerated conditions (2-8 °C) and protected from light for 10 days at concentrations bracketing those used in the present study.

### **Results**

Analysis of the dose formulation samples revealed all actual concentrations were within the acceptance criteria of  $\pm$  15% of the respective theoretical concentrations. All dose formulation samples met acceptance criteria for homogeneity (the relative standard

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

deviation [RSD] of concentrations was < 5% for each group). Control substance samples contained no detectable concentrations of the test substance.

Urine-stained abdominal fur, dehydration (based on skin turgor), and red perinasal substance occurred in the 700 mg/kg bw/day group. These clinical signs were attributed to administration of the test item. Additional clinical signs included but were not limited to excess salivation, thin body condition, urine-stained perivaginal area, all of which occurred in a single animal in the 700 mg/kg bw/day group; these clinical signs were also attributed to test item administration. Urine-stained abdominal fur also occurred in an increased number of animals at 250 mg/kg bw/day, and dehydration was noted in a single animal on a single occasion. No test item-related clinical signs were observed at 100 mg/kg bw/day.

Mean maternal body weights and body weight changes (absolute and corrected for gravid uterine weights) were reduced at 700 mg/kg bw/day, and mean absolute body weight gain between DGs 6 and 21 was reduced by 24% when compared to the control group value. Likewise, mean absolute and relative food consumption values in this dose group were reduced by 14% and 12%, respectively when compared to the respective control group values during this same interval. Mean body weight and body weight changes and food consumption values were not affected by the administration of the test substance in the other dose groups.

Slight reductions in fetal body weight averages (approximately 7%) were noted at 700 mg/kg bw/day. Fetal morphology examinations revealed reduced numbers of ossified caudal vertebrae and hind limb tarsals, metatarsals, and phalanges at 700 mg/kg bw/day. No test item-related effects were observed at 100 and 250 mg/kg bw/day.

Overall, daily test item administration at 700 mg/kg bw/day from DGs 6-20 caused maternal toxicity, as evidenced by clinical signs, significantly reduced food consumption and significantly reduced body weight and body weight changes. There were no compound-related effects regarding pregnancy or Caesarean-sectioning examination parameters. Mean fetal body weights were slightly reduced at 700 mg/kg bw/day. Fetal examinations revealed reductions in the mean number of ossification sites in the caudal vertebrae and hind limbs, but no test item-related effects regarding the incidence of malformations and other variations. The reductions in the mean number of ossification sites at the caudal vertebrae and hind limbs were morphological correlates of the reductions in fetal body weight averages, which occurred at a maternally toxic dose level. It is known from the literature (Fleeman *et al.*, 2005) that reductions in fetal body weights and delays in ossification frequently occur concurrent with reduced maternal food consumption and maternal body weights, as seen in the current study results.

At 250 mg/kg bw/day, a higher incidence of urine-stained abdominal fur was present in the dams. Mild dehydration (based on skin turgor) occurred in a single rat on a single occasion. In the absence of any other changes, these findings were not considered as adverse. No embryo-fetal effects were observed.

Neither maternal nor embryo-fetal effects were observed at 100 mg/kg bw/day.

## Conclusion

Under the conditions of this study with the C-1701 B\_C\_3, the No Observed Adverse Effect Levels (NOAELs) for maternal and embryo-fetal toxicity were established at 250 mg/kg bw/day.

Reductions in fetal body weight averages and reductions in the mean number of ossification sites in the caudal vertebrae and hind limbs occurred at 700 mg/kg bw/day, and were considered related to maternal toxicity, as these effects were concurrent with decreased maternal food consumption and body weights. These reductions in fetal body weights and

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

ossification sites were not observed at lower dose levels, including 250 mg/kg bw/day, where evidence of maternal toxicity was not apparent.

Considering that test item-related slight reduction in fetal body weight and retardation of ossification were seen only in association with maternal toxicity, C-1701 B\_C\_3 was considered to have no selective embryotoxicity or teratogenicity.

Ref.: 28, 30

**SCCS comment**

SCCS agrees with a NOAEL of 250 mg/kg bw/day for maternal toxicity as well as for the embryo-fetal toxicity.

### **3.3.7 Mutagenicity / Genotoxicity**

#### **3.3.7.1 Mutagenicity / genotoxicity *in vitro***

##### **Bacterial Reverse Mutation Test (AMES)**

Guideline:	OECD 471; Commission Regulation (EC) No 440/2008, B.13/B.14; US EPA OPPTS 870.5100
Test system:	Salmonella typhimurium strains TA1535, TA100, TA1537, TA98 and E. coli WP2 uvrA
Replicates:	Triplicate plates
Test substance:	C-1701 B_C_3
Batch:	1442/3+4
Purity:	98.8%
Solvent:	DMSO
Concentrations:	0, 33, 100, 333, 1 000, 2 625 and 5 250 µg/plate.
Treatment:	Exp. 1: Standard plate test (SPT) and Exp. 2: preincubation test (PIT), both with and without a mammalian metabolic activation system, incubation 48-72 h
Negative control:	DMSO
Positive control:	with S9-mix: 2 Aminoanthracene (2-AA), without S9-mix: N-methyl-N'-nitro-N-nitrosoguanidine (MNNG), 4-Nitro-o-phenylenediamine (NOPD), 9 Aminoacridine (AAC), 4 Nitroquinoline-N-oxide (4 NQO)
GLP:	in compliance
Study period:	10 April 2011 - 31 January 2012

The test substance C-1701 B\_C\_3 was tested for mutagenicity in the Salmonella typhimurium / Escherichia coli reverse mutation assay both in the standard plate test (SPT) and in the preincubation test (PIT) with and without metabolising system (S9 mix), obtained from phenobarbital/β-naphthoflavone-induced rats using the Salmonella strains TA 1535, TA 100, TA 1537, TA 98 and Escherichia coli WP2 uvrA.

The stability of the test item at room temperature in the vehicle DMSO over a period of 4 hours was verified analytically.

Bacteriotoxicity was detected by a decrease in the number of revertants, clearing or diminution of the background lawn and/or reduction in the titer. Precipitation of the test item was recorded. Individual plate counts and the mean number of revertant colonies per plate were determined for mutagenicity assessment.

The test item was considered positive in this assay if a dose-related and reproducible increase in the number of revertant colonies, *i.e.* nearly doubling of the spontaneous mutation rate in at least one tester strain either without S9-mix or with S9-mix, was noted. A test substance was considered non-mutagenic if the number of revertant colonies for all tester strains was within the historical NC range under all experimental conditions in two

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

independent experiments. Negative and positive controls were in accordance with the OECD guideline.

## Results

Bacteriotoxicity (decrease in the number of his<sup>+</sup> revertants, slight reduction in the titer) was observed in the SPT and PIT depending on the strain and test conditions at or from about 2625 µg/plate onward. No test item precipitation was found with and without S9-mix. C-1701 B\_C\_3 did not induce a biologically relevant increase in the number of revertant colonies over background, either with S9-mix or without S9-mix in two independent experiments (SPT and PIT).

The results of the NC and PC items performed in parallel corroborated the validity of this study, since the values fulfilled the acceptance criteria. The number of revertant colonies in the NC plates was within the range of the historical NC data for each tester strain, with and without S9-mix. In addition, the PC items both with and without S9-mix induced a significant increase in the number of revertant colonies within the range of the historical PC data or above.

## Conclusion

C-1701 B\_C\_3 up to 5250 µg/plate was not mutagenic in the bacterial reverse mutation test (Ames test) neither in the absence nor in the presence of a mammalian metabolic activation system S9-mix under the experimental conditions of the study.

Ref.: 31

## ***In vitro Micronucleus Test in human lymphocytes***

Guideline:	OECD 487 (2010)
Species/strain:	Cultured human peripheral blood lymphocytes from two female volunteers (pooled blood)
Replicates:	Duplicate cultures, two independent experiments
Test substance:	C-1701 B_C_3
Batch:	1442/3+4
Purity:	98.8%
Concentrations:	Exp1: -S9 mix: 750, 900, 1050 µg/mL (3 h), +S9 mix: 750, 900, 1000 µg/mL (3 h), -S9 mix: 80, 110, 155 µg/mL (24 h) Exp1:-S9 mix: 400, 800, 1000 µg/mL (3 h), +S9 mix: 800, 950, 1000 µg/mL (3 h)
Solvent/negative Control (NC):	0.85% saline
Positive Controls (PC):	-S9 mix: Mitomycin C (MMC), Vinblastine (VIN) +S9 mix: Cyclophosphamide (CPA)
Vehicle:	DMSO
GLP:	In compliance
Study period:	27 October 2011 - September 12, 2012

In an *in vitro* micronucleus assay, C-1701 B\_C\_3 (purity/content: 98.8%; batch: 1442/3+4) was tested using duplicate human lymphocyte cultures prepared from the pooled blood of two female donors in two independent experiments for clastogenicity and aneugenicity assessment. The maximum concentrations analysed were determined following a preliminary cytotoxicity experiment. Cytotoxicity was assessed as reduction in the replication index (RI). Suitable maximum concentrations for analysis were selected with special regard to the steep concentration-related toxicity observed.

Treatments were conducted 48 hours following mitogen stimulation with Phytohaemagglutinin (PHA). Cells were exposed to the test item in the vehicle DMSO for 3 hours (followed by 21 hours recovery) in the absence and the presence of a mammalian metabolic activation system (S9-mix from the liver of Aroclor 1254 induced male Sprague Dawley rats). In addition, cells were exposed for 24 hours (equivalent to approximately 1.5 to 2 times the average generation time of cultured lymphocytes from the panel of donors used in this laboratory; no recovery) in the absence of S9-mix.

Negative and positive controls were in accordance with the OECD guideline.

All cultures were sampled 24 hours after the beginning of treatment (*i.e.* 72 hours after culture initiation). A total of 1000 binucleate cells from each culture (2000 cells/concentration) was analysed for micronuclei. The test item was considered to induce clastogenic and/or aneugenic events if a statistically significant increase in the frequency of binucleate cells with micronuclei (MNBN) at one or more concentrations was observed, an incidence of MNBN cells at such a concentration that exceeded the normal range in both replicates was seen and a concentration-related increase in the proportion of MNBN cells was noted.

## Results

### Experiment 1

Treatment of cells with C-1701 B\_C\_3 for 3 hours in the absence of S9-mix in Experiment 1 resulted in mean frequencies of MNBN cells that were significantly higher than those observed in concurrent NCs at the highest two concentrations analysed (900 and 1050 µg/mL, giving 23% and 69% reductions in RI, respectively). The MNBN cell frequencies exceeded the 95<sup>th</sup> percentile of the observed historical NC range (0.1-1.0%) in one culture at 900 µg/mL and both cultures at 1050 µg/mL and there was evidence of a concentration-related response. However, the MNBN frequencies in both cultures at 900 µg/mL were below the upper limit of the historical NC range (2.40%) and the only concentration at which the MNBN frequencies exceeded this range (1050 µg/mL) gave 69% reduction in RI (greater than the target RI range of 50-60%). The data therefore showed evidence of micronucleus induction under this treatment condition, but primarily at a cytotoxic concentration at which increased MNBN frequency might be a secondary effect of cytotoxicity.

Treatment of cells for 3 hours in the presence of S9-mix resulted in frequencies of MNBN cells that were significantly higher than those observed in concurrent NCs at the highest concentration analysed (1000 µg/mL, giving 39% reduction in RI). The MNBN cell frequencies exceeded the 95<sup>th</sup> percentile of the historical NC range (0.1-1.1%) in both cultures at 1000 µg/mL.

Treatment of cells for 24 hours in the absence of S9-mix resulted in frequencies of MNBN cells that were similar to (and not significantly different from) those observed in concurrent NCs at all concentrations analysed. The MNBN cell frequencies in all treated cultures fell within the 95% percentile of the historical NC range (0.1-1.4%).

### Experiment 2

Treatment of cells for 3 hours in the absence of S9-mix resulted in frequencies of MNBN cells that were significantly higher than those observed in concurrent NCs at the highest two concentrations analysed (800 and 1000 µg/mL, giving 31% and 39% reductions in RI, respectively). The MNBN cell frequencies exceeded the 95% percentile of the historical NC range (0.1-1.0%) in both cultures at 800 and 1000 µg/mL and exceeded the upper limit of the historical NC range at 1000 µg/mL with evidence of a concentration-related increase in MNBN cell frequency, thus fulfilling the criteria for a positive response. The data from Experiment 2 in the absence of S9-mix therefore confirmed the evidence of micronucleus induction seen in Experiment 1 at concentrations giving moderate levels of cytotoxicity.

Treatment of cells for 3 hours in the presence of S9-mix resulted in frequencies of MNBN cells that were significantly higher than those observed in concurrent NCs at all three concentrations analysed (800, 950 and 1000 µg/mL, giving 14%, 30% and 46% reductions in RI, respectively). The MNBN cell frequencies exceeded the 95% percentile of the historical NC range (0.1-1.1%) in one culture at 800 µg/mL and in both cultures at 950 and 1000 µg/mL, with evidence of a concentration-related increase in MNBN cell frequency.

Because of the positivity observed after a 3-hour treatment, treatment of cells for 24 hours in the absence of S9-mix was not considered necessary in Experiment 2.

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

The data therefore showed evidence of micronucleus induction in the presence of S9-mix in Experiments 1 and 2.

### Conclusion

C-1701 B\_C\_3 induced micronuclei in cultured human peripheral blood lymphocytes when tested for 3 hours in the absence and presence of a mammalian metabolic activation system. In the same test system, the test item did not induce micronuclei when tested up to cytotoxic concentrations for 24 hours in the absence of metabolic activation.

Ref: 32

### SCCS comment

S87 was positive in an *in vitro* micronucleus assay. After 3h treatment both with and without S9-mix, a statistically significant and concentration-dependent increase in the number of cells with micronuclei was observed in both experiments.

The CCS notes a discrepancy in the highest concentrations used in the MN tests (>750 µg/mL) and in the solubility of the test substance in water (450 µg/mL) as reported in the paragraph 3.1.6 Solubility.

### ***In Vitro Micronucleus Test using Reconstructed skin Micronucleus (RSMN) assay in EpiDerm™***

Guideline:	OECD Guideline not available
Species/strain:	EpiDermTM tissues come from MatTek Corporation (Ashland, MA, USA)
Replicates:	Two independent experiments, triplicate tissue
Test substance:	C-1701 B_C_3
Batch:	0009511412
Purity:	98.8%
Concentrations:	10, 20, 25, 30, 35, 40, 45, 50, and 60 mg/mL
Treatment:	First experiment 2-day regime (2x24 h), 2. Experiment 3-day regime (3x 24h)
Solvent/negative control:	acetone
Positive Controls:	Mitomycin C (MMC),
Vehicle:	acetone
GLP:	In compliance
Study period:	November 2, 2015 – March 16, 2016

The genotoxic potential of C-1701 B\_C\_3 (purity/content: 98/73% by HPLC, batch 0009511412) was assessed for induction of micronuclei in the reconstructed skin micronucleus assay (RSMN) in EpiDerm™ on the basis on an expert recommended protocol (Dahl et al, 2011) derived from the general *in vitro* micronucleus OECD Guideline 487.

Tissues were treated by application of 10 µL of the test article/vehicle mixture at the appropriate concentration on the top surface of the tissue. EpiDermTM tissues come from MatTek Corporation (Ashland, MA, USA) and are multi-layered, differentiated tissues consisting of basal, spinous, granular and cornified layers resembling the normal human epidermis (MatTek Corporation, 2010).

Cytotoxicity was assessed by calculating the cytokinesis-block proliferation index (CBPI) and determining the relative viable cell count (RVCC), whichever parameter came first.

In the preliminary cytotoxicity and the 1st definitive micronucleus assay, EpiDermTM tissues were treated twice, 24 hours apart, and tissues were processed at 48 hours (2-day dosing regimen). In the confirmatory micronucleus assay, the tissues were treated three times, 24 hours apart, and tissues were processed at 72 hours (3-day dosing regimen).

The preliminary cytotoxicity test was conducted by exposing a single tissue per concentration to vehicle alone and 15 concentrations of the test article ranging from 0.006 to 100 mg/mL (corresponding to the maximum recommended concentration). Both

Micronucleus assays were conducted with 9 concentrations using triplicate tissues. The highest dose level evaluated for micronuclei was selected to give 50 to 60% cytotoxicity (CBPI relative to the vehicle control or reduction in RVCC, whichever comes first) and at least two additional dose levels, demonstrating moderate to minimal toxicity, were also evaluated.

## Results

In the preliminary assay, ≥ 50% cytotoxicity by calculating CBPI relative to vehicle control was observed at concentrations ≥ 50 mg/mL, while cytotoxicity RVCC determination was not observed at any concentrations. Precipitate was observed on the tissue at concentrations ≥ 50 mg/mL at the end of treatment.

Based on these results, the definitive micronucleus assay was conducted at concentrations ranging from 10 to 60 mg/mL. A 50 to 60% cytotoxicity by calculating CBPI relative to vehicle control was observed in the 3 replicates at the concentrations of 25 and 30 mg/mL, while cytotoxicity by RVCC determination was not observed at any concentration. The concentrations selected for scoring micronuclei were 10, 20, 25, and 30 mg/mL. One thousand binucleated cells per tissue were scored for the presence of micronuclei. The percentage of micronucleated binucleated cells in the test article-treated tissues was not significantly increased relative to the vehicle control at any concentration tested.

Since the result of the micronucleus assay using a 2-day dosing regimen was negative, a confirmatory assay was conducted with a 3-day dosing regimen at concentrations ranging from 8 to 35 mg/mL.

In the confirmatory micronucleus assay, cytotoxicity of 50 to 60% (determined by calculating CBPI relative to vehicle control) was observed at the concentrations of 24 and 26 mg/mL, while cytotoxicity (RVCC) was not observed at any other concentrations. The concentrations selected for scoring micronuclei were 8, 20, and 26 mg/mL. The percentage of micronucleated binucleated cells in the test article-treated tissues was not significantly increased relative to the vehicle control at any concentration tested.

In addition, in the definitive and confirmatory micronucleus assays, the percentage of micronucleated binucleated cells in the vehicle control was within the acceptable historical control range and the percentage of micronucleated binucleated cells in the positive control was statistically increased and also within the historical positive range.

## Conclusion

Based on the findings of this study, it was concluded that C-1701 B\_C\_3 was negative for the induction of micronuclei in the reconstructed skin micronucleus assay (RSMN) in EpiDerm™.

Ref.: 33

## Overall conclusion on genotoxicity by the Applicant

The genotoxic potential of C 1701 B\_C\_3 was evaluated in an extensive battery of *in vitro* studies including the bacterial reverse mutation test, a micronucleus test in cultured human lymphocytes and also in a reconstructed skin micronucleus assay (RSMN assay) in EpiDerm™ model.

When tested for gene mutation in a bacterial system (in independent experiments) with and without addition of a mammalian metabolic activation system, the UV filter C 1701 B\_C\_3 was shown to be non-mutagenic *in vitro*.

The potential of C-1701 B\_C\_3 to induce clastogenicity and/or aneugenicity was assessed in two separate *in vitro* micronucleus tests.

In the *in vitro* micronucleus test in cultured human peripheral blood lymphocytes, C-1701 B\_C\_3 induced micronuclei when tested for 3 hours in the absence and presence of a mammalian metabolic activation system. A reconstructed skin micronucleus assay (RSMN assay) in EpiDerm™ model was done as an alternative to an *in vivo* test. In this test, C-1701 B\_C\_3 did not induce any increase in the frequency of micronuclei at any tested concentrations showing a sufficient cytotoxicity (50-60% of cytotoxicity). This model currently under validation has already been demonstrated to be sensitive to the clastogenic and aneugenic activity of variety of chemicals and is considered as especially relevant for

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

chemicals for which human exposure is expected to be dermal. In addition, the Epiderm™ model has been shown to be more permeable than human skin and the applied dose is higher in this test than expected in human. Thus, the exposure conditions in this model are assumed to be maximal.

Taken together, the results obtained in the available *in vitro* test battery, addressing all relevant endpoints of genotoxicity, indicate that the UV filter C-1701 B\_C\_3 is non-mutagenic and non-genotoxic.

**SCCS comment**

The SCCS considers RSMN assay in combination with the Comet assay a promising new *in vitro* approach designed to assess genotoxicity of dermally-applied compounds. However, in the RSMN assay on S87 (GLP study) submitted by the applicant, only Mitomycin C was used (a direct-acting clastogen) as a positive control substance. Additional genotoxins with a different mode of action should be applied as a positive control (e.g. cyclophosphamide, indirectly acting clastogen and vinblastine, direct aneugen).

The SCCS is of the opinion that the reconstructed skin micronucleus EpiDerm assay alone cannot be used to overrule the positive result in the *in vitro* micronucleus test.

**3.3.7.2 Mutagenicity / genotoxicity *in vivo***

**Submission II**

***In vivo Mammalian Erythrocytes Micronucleus Test***

Guideline:	OECD 474 (1997)
Species/strain:	Sprague-Dawley (Hsd:SD) male and female Sprague-Dawley rats
Group size:	5 rats/sex/group
Test substance:	C-1701 B_C_3, the code number AD48SR
Batch:	C-1701/8
Purity:	98.4 – 98.7 99.2%
Vehicle:	Polyethylene glycol PEG 300 (CAS no 25322-68-3; lot no S5473984)
Positive control:	Cyclophosphamide monohydrate (CP; CAS no 6055-19-2; lot no 120M1253V;
Dose level:	500, 1000 and 2000 mg/kg bw
Route:	oral
Treatment:	twice in 24h interval
Sacrifice times:	24 h after the last administration
GLP:	in compliance
Study period:	March 13 - December 11, 2012

C-1701 B has been investigated for the induction of micronucleated polychromatic erythrocytes (mnPCEs) in the bone marrow of male and female Sprague-Dawley rats after repeated administration. Groups of 5 Sprague-Dawley rats/sex/dose level received a first (first dose given on day 0) and, 24 hours later, a second oral gavage treatment with the test item suspended in Polyethylene glycol 300 (PEG 300) at dose levels of 500, 1000 or 2000 mg/kg/d (dose volume: 10 mL/kg). A concurrent control group of 5 rats/sex was dosed similarly with the vehicle only. A positive control group of 5 rats/sex received a single oral gavage administration of Cyclophosphamide (CPA) in water at 40 mg/kg. During the in-life period mortality, clinical signs and body weights were repeatedly assessed. Following necropsy (conducted 24 hours after last administration) and preparation of bone marrow smears, the number of mnPCE was counted in 2000 PCEs for each animal using a fluorescent microscope. The number of normo-chromatic erythrocytes (NCEs) and micronucleated NCEs (mnNCEs) in the field of 1000 total erythrocytes (PCEs + NCEs) was

determined for each animal. The proportion of PCEs to total erythrocytes was determined per total of 1000 erythrocytes (PCEs + NCEs) for each animal as an indication of bone marrow cytotoxicity. A test substance is considered positive in this assay if it induces a significant increase in mnPCE frequency at any dose level or sampling time ( $p \leq 0.05$ , one-way ANOVA or T-test or Kastenbaum and Bowman table). During the study, dose formulation samples were collected for homogeneity and concentration control analysis.

## Results

No mortality was observed in any of the treatment groups. Diarrhea was noted in two male rats in the vehicle control group on day 2 (first dose given on day 0). In all high dose group animals piloerection was noted after the second administration of 2000 mg/kg (day 1) which persisted in the males until euthanasia (day 2). All other animals appeared normal during the study period. No appreciable changes in group mean body weights were observed in most groups, although a slight body weight loss was observed in high dose males between days 1 and 2. These adverse effects were considered to represent evidence of systemic exposure of treated animals to the test substance.

Based on the analytical results, all test item formulations used in this study were within the adequate range and the test item was homogeneously distributed in the vehicle.

There were no statistically significant decreases in the proportion of PCEs to total erythrocytes at any dose level ( $p > 0.05$ ), indicating that the test item did not inhibit erythropoiesis. However, individual high dose males (2000 mg/kg/d) exhibited decreased PCE proportions as compared to the concurrent control males. Collectively, the clinical observations, the loss in body weight between days 1 and 2 in males, and individually low PCE proportions in males were considered to be indicative of systemic exposure to the test substance in animals given the highest dose level.

No statistically significant increases in mnPCE frequencies were observed at any dose level of the test item as compared to the concurrent vehicle control ( $p > 0.05$ ). In contrast, the positive control item induced a statistically significant increase in mnPCE frequencies ( $p \leq 0.05$ ). All positive and vehicle control values were within acceptable ranges, and all criteria for a valid assay were met.

## Conclusion

Under the conditions of this *in vivo* study, C-1701 B\_C\_3 was negative in the bone marrow micronucleus test in male and female rats after repeated administration. The adverse effects seen at the high dose were considered to be indicative of systemic exposure to the test substance.

Ref.: 34

## SCCS comment

The SCCS agrees that, from the clinical symptoms and other toxicological studies, there is sufficient proof of systemic exposure. Analysis of plasma to measure whether S87 reached systemic circulation could provide further evidence of bone marrow exposure.

It is not clear how many experiments represent historical controls, i.e. how many studies were conducted between 2009-2011.

Based on analysis the results can be considered negative, i.e. S87 does not induce increased frequency of micronuclei in the bone marrow.

## SCCS overall conclusion on genotoxicity

Based on the data provided on *in vivo* and *in vitro* test battery, S87 can be considered to have no genotoxic potential *in vivo*.

### 3.3.8 Carcinogenicity

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### 3.3.9 Photo-induced toxicity

#### 3.3.9.1 Phototoxicity / photo-irritation and photosensitisation

##### ***In vitro* 3T3 NRU phototoxicity test**

Guideline: OECD 432; Commission Regulation (EC) No 440/2008, B.41

Species: Balb/c 3T3 cells

Test substance: C-1701 B\_C\_3

Batch: C-1701/8

Purity: 96.3%

Vehicle: aqueous Dimethyl sulfoxide (DMSO, 1.0% v/v)

Exposure duration: 24 h

Concentrations: UVA: 0, 4.6, 10.0, 21.5, 46.4, 100.0, 215.4, 464.2, 1000.0 µg/mL; +UVA:  
0, 4.6, 10.0, 21.5, 46.4, 100.0, 215.4, 464.2, 1000.0 µg/mL

GLP: In compliance

Study period: July – September 2012

Photo-cytotoxicity was estimated using the neutral red uptake (NRU) method. Two independent experiments (Experiment 1 and 2) were carried out, both with and without irradiation by means of an ultraviolet A (UVA) source. According to an initial range-finding phototoxicity test conducted for the determination of experimental concentrations, the following concentrations were tested in aqueous Dimethyl sulfoxide (DMSO, 1.0% v/v) in both main experiments:

- without UVA irradiation (-UVA)

0, 4.6, 10.0, 21.5, 46.4, 100.0, 215.4, 464.2, 1000.0 µg/mL

- with UVA irradiation (+UVA)

0, 4.6, 10.0, 21.5, 46.4, 100.0, 215.4, 464.2, 1000.0 µg/mL

After an attachment period of about 24 hours, the cells were pre-incubated with the test item or the positive control (PC) item Chlorpromazine (CPZ) for 1 hour in the dark. Then one microtiter plate per substance (test item or PC item) was irradiated for 50 minutes with the UVA irradiation source (approximately 5 J/cm<sup>2</sup>). The respective reference plates treated in parallel were kept in the dark for the same period. About 24 hours after end of treatment, the cytotoxicity was determined by measuring the NRU using a microplate reader. In addition, the pH value, osmolarity, test item solubility (precipitation) and cell morphology in the cultures were assessed.

The prediction model is based on the comparison of two equi-effective cytotoxic concentrations (EC50 values) obtained in concurrently performed experiments in the absence (-UVA) and presence (+UVA) of UVA irradiation, which are used to calculate a photo-irritancy factor (PIF): PIF = EC50(-UVA) / EC50(+UVA)

If a test substance is only cytotoxic after irradiation (+UVA), a C PIF has to be calculated using the highest test concentration (Cmax) applied in the experimental part in the absence of UV light (-UVA): C PIF = Cmax(-UVA) / EC50(+UVA)

## **Results**

After treatment with the test item, cytotoxic effects indicated by neutral red absorbance values of below 50% of control were observed in Experiments 1 and 2 in the presence of

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

UVA irradiation and only in Experiment 2 in the absence of UVA irradiation at the highest concentration. Without UVA irradiation, in Experiment 2 there was a decrease in the cell number at 1000 µg/mL (EC50: 958.1 µg/mL). The cell densities were not distinctly reduced. In addition, with UVA irradiation, there was a decrease in the cell number at 1000 µg/mL (Experiment 1: EC50 of 998.7 µg/mL; Experiment 2: EC50 of 758.4 µg/mL). The cell densities were not distinctly reduced. Based on the EC50 values a C PIF of 1.0 (no phototoxic potential) was obtained in Experiment 1 and a PIF of 1.3 (no phototoxic potential) was obtained in Experiment 2.

The vehicle controls (DMSO) clearly fulfilled the acceptance criteria. The PC item led to the expected cytotoxicity both with and without UVA irradiation (PIF: 28.7 and 44.2 in each experiment, respectively). Osmolarity and pH values were not influenced by the test item treatment. No precipitation was noted in Experiments 1 and 2 at the end of the exposure period.

### Conclusion

Under the experimental conditions of this study, C-1701 B\_C\_3 was not a phototoxic substance in the *in vitro* 3T3 NRU phototoxicity test using Balb/c 3T3 cells.

Ref.: 35

### Skin photosensitisation study in guinea pigs

Guideline/method:	No guideline available
Species/strain:	Guinea pig / Hartley Crl:HA
Group size:	Main study: 10 animals/group (with UV irradiation) and 5 animals/group (without UV irradiation), Positive control: 2 groups with 5 animals/group
Test substances:	C-1701 B_C_3 (solution 50% (w/v) in N,N-Dimethylformamide)
Batch:	C-1701/8
Purity:	96.3% ( <sup>1</sup> H-NMR)
Concentration:	10, 25 or 50 w/v% (preliminary study) and 50% (w/v) (main study)
Volume:	Duplicate 0.5 mL samples
Route:	Epicutaneous
Negative control:	
Positive control:	3,3',4',5 Tetrachlorosalicylanilide (TCSA) in acetone.
Source of light:	Dermaray®-200 type UV irradiator
Irradiation:	In the main study the actual values of irradiance, intensity and duration of irradiation were 8.10-8.85 J/cm <sup>2</sup> , 5.4-5.9 mW/cm <sup>2</sup> and 1500 s for UVA light and 0.093-0.098 J/cm <sup>2</sup> , 0.93-0.98 mW/cm <sup>2</sup> and 100 s for UVB light, respectively
Observations:	1, 4, 24 and 48 hrs after application
GLP:	In compliance
Study period:	28 August 2012- 9 January 2013

The concentrations of dose formulations used in this study were verified by means of a HPLC method. The stability of another batch of C-1701 B\_C\_3 (batch: 1442/3+4) at 1 and 50% (w/v) was confirmed for a storage duration of 4 hours in tight containers at room temperature. Dose formulations in this study were used within 2 hours after preparation. In the main assay, a test item concentration of 50% (w/v) was used for induction and challenge.

### Results

No clinical signs were observed in any animal in the test item or vehicle control group. The animals gained weight in a normal range during the course of the study.

During the induction period, slight erythema (score = 0.5) was observed in 2 animals each at the induction sites with DMF in the vehicle control and UV irradiated test item groups

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

starting prior to the fourth induction until prior to the last (sixth) induction. No erythema was observed at any induction site with the test item in the UV-irradiated or UV non-irradiated test item group.

No erythema was observed at any challenge site with the test item in the vehicle control group, the test item groups (with or without UV irradiation) or at any challenge site with DMF in the UV-irradiated test item group.

In the PC groups, slight erythema (score = 0.5) was observed prior to the fourth induction at the induction sites with TCSA in the UV-irradiated and UV non-irradiated groups. The degree of erythema increased thereafter and erythema was still observed at 24 hours after the last induction. At the challenge sites with TCSA, slight erythema was observed in the UV non-irradiated group and mild or marked erythema was observed in the UV irradiated group. Therefore, the skin photosensitising potential of TCSA was confirmed and it was demonstrated that this study was conducted under the appropriate conditions.

Analysis of dose formulations revealed appropriate dosing with the test item. The mean measured concentrations at the first and second preparations were 113.5% and 98.9% of the nominal concentration, respectively and were considered acceptable.

### Conclusion

Based on the results obtained, under the conditions of this study, C-1701 B\_C\_3 displayed no skin photoirritating or photosensitising potential when tested up to 50% (w/v) in DMF.

Ref: 36

#### 3.3.9.2 Phototoxicity / photomutagenicity / photoclastogenicity

### Photomutagenicity in a *Salmonella typhimurium* and *Escherichia coli* reverse mutation assay

Guideline: Based on OECD 471; EC 440/2008, B.13/14, SCCNFP/0690/03  
Species/strain: *Salmonella typhimurium* strains TA1537, TA98, TA100, TA102 and *Escherichia coli* strain WP2  
Replicates: Triplicates in 3 individual experiments  
Test substance: C-1701 B\_C\_3  
Solvent: DMSO  
Batch: C-1701/8  
Purity: 96.8%  
UV source: Dr. Höhle Sol 500 solar simulator  
UVA doses: TA 1537, TA 98, T100 and WP2: 486 mJ/cm<sup>2</sup>, TA102 324 mJ/cm<sup>2</sup>  
UVB doses: The filter H1 was used to keep the UVB irradiation as low as possible.  
Concentrations: Pre- Experiment: 3, 10, 33, 100, 333, 1000, 2500, 5000 µg/plate  
Experiment I and II: 33, 100, 333, 1000, 2500, 5000 µg/plate  
Positive controls: -UVA: Sodium azide (TA100, 10 µg/plate), 4-Nitro-o-phenylene-diamine (TA1537, 50 µg/plate; TA98, 10 µg/plate), methyl methane sulfonate (WP2 and TA102, 3.0 µL/plate). +UVA: 8-methoxysoralen (WP2, TA102; 125 µg/plate).  
Treatment:  
GLP: In compliance  
Date: 24 October 2012 – 13 May 2013

### Methods

This study was performed to investigate the potential of C-1701 B\_C\_3 to induce gene mutations under irradiation with artificial sunlight according to the plate-incorporation test (Experiment I) and the pre-incubation test (Experiment II) using the *Salmonella typhimurium* strains TA1537, TA98, TA100, TA102 and *Escherichia coli* strain WP2. These

strains were chosen since they tolerate relatively high doses of ultraviolet (UV) irradiation used to assess the possible photomutagenic potential of sunblockers.

The assay was performed in three independent experiments including a pre-experiment for dose selection for the main experiments. Each concentration, including the controls, was tested in triplicate.

## Results

Precipitation of the test item was observed in the overlay agar in the test tubes at 5000 µg/plate in all experiments. No precipitation of the test item was observed on the incubated agar plates.

The plates incubated with the test item showed normal background growth up to 5000 µg/plate without metabolic activation with irradiation in both independent experiments. No toxic effects, evident as a reduction in the number of revertants, occurred in the test groups with irradiation and without metabolic activation. No substantial increase in revertant colony numbers of any of the 5 tester strains was observed following test item treatment under irradiation with artificial sunlight at any concentration tested.

The appropriate reference mutagens used as PCs showed a distinct increase of induced revertant colonies over background, thus confirming sensitivity of the test system.

## Conclusion

Under the experimental conditions reported, C-1701 B\_C\_3 did not induce gene mutations by base pair changes or frameshifts in the genome of the bacterial strains used. Therefore, C 1701 B\_C\_3 was non-mutagenic in this *Salmonella typhimurium* and *Escherichia coli* photomutagenicity assay.

Ref.: 37

### 3.3.10 Human data

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### 3.3.11 Special investigations

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## 3.4 Safety evaluation (including calculation of the MoS)

### CALCULATION OF THE MARGIN OF SAFETY

Margin of safety calculation based on dermal absorption of test substance reported in µg/cm<sup>2</sup>.

The estimated systemic exposure dose (SED), that results from exposure to S87 in cosmetic products (3% w/w), when applied to the human skin, is calculated to amount to 1.02 mg/kg bw/day under consideration of the test item fraction absorbed in the key *in vitro* dermal absorption study conducted with split-thickness human skin according to the following formula:

Absorption through the skin	DA <sub>a</sub>	= 1.75 µg/cm <sup>2</sup>
Skin Surface area	SSA	= 17500 cm <sup>2</sup>
Dermal Absorption per treatment	SSA x DA <sub>a</sub> x 0.001	= 30.6 mg
Typical body weight of human		= 60 kg
Systemic exposure dose (SED)	SSA x DA x 0.001 x F*/bw	= 1.02 mg/kg bw
No observed adverse effect level (90-day, oral, rat)	NOAEL	= 250 mg/kg bw/d
Bioavailability 50%**		= 125 mg/kg bw/d

Margin of Safety	adjusted NOAEL/SED = 122
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\*F = frequency of product application (= 2 as recommended for sun care products in NoG, worst case scenario)

\*\* default approach used in standard procedure according to the SCCS's Notes of Guidance for the testing of cosmetic ingredients and their safety evaluation.

An acceptable **MoS of 122** is derived for the use of S87 at 3% in a cosmetic product.

### 3.5 Discussion

#### **Physicochemical properties**

The SCCS has noted that the quantification for the impurities was based on HPLC-DAD data of the concentrated and the diluted solution of the test substance. Therefore, the Applicant should explain the dilution factor used for the calculation and the linearity range (concentrations) of the test substance.

S87 is a secondary amine, and thus is prone to nitrosation and formation of nitrosamines. It should not be used in combination with nitrosating substances. The nitrosamine content should be < 50 ppb.

#### **Function and uses**

S87 is proposed to be used as a UV filter in personal care products, including sun care cosmetic formulations at a maximum concentration of 3% w/w.

#### **Toxicological Evaluation**

##### **Acute toxicity**

On the basis of data provided, S87 is not considered to be acutely toxic.

##### **Irritation and corrosivity**

In the basis of the data provided, S87 is not expected to be irritating to the skin or the eye at the use concentration and undiluted.

##### **Skin sensitisation**

The skin sensitising potential of S87 was assessed in the LLNA:BrdU-ELISA assay. Based on the results of this study, S87 is regarded to be a non-skin sensitisier.

##### **Dermal absorption**

The dermal absorption study was performed adequately. The SCCS has therefore used the mean +1SD ( $1.63\%+1.02=2.65\%$  or  $1.08+0.67 \mu\text{g}/\text{cm}^2=1.75 \mu\text{g}/\text{cm}^2$ ) for MoS calculations.

##### **Repeated dose toxicity**

Administration of S87 by oral gavage to rats once a day for 90 days at a dose of 1000 mg/kg/day resulted in no test article-related gross findings, although liver weight changes with associated microscopic liver findings (centrilobular hypertrophy) were noted. There were statistically significant changes in other organ weights, but there were no patterns, trends or associated microscopic findings to identify them as being toxicologically relevant. Administration of S87 by oral gavage to rats once a day for 90 days at a dose of 100 or 300 mg/kg/day resulted in no test article-related gross findings, organ weight changes in liver (increased) only in females at the 300 mg/kg/day dose level and no microscopic findings in the liver. Therefore, based on these results, a NOAEL of 300 mg/kg/day may be derived.

##### **Inhalation toxicity**

No data have been provided on inhalation toxicity of S87.

### **Reproductive toxicity**

Based on the results of a reproduction/developmental screening study in rats, the NOAEL for parental toxicity of S87 was considered to be 250 mg/kg bw/day given the signs observed at the highest tested dose (urine-stained abdominal fur, mean body weight gains and slightly decreased mean food consumption values). The NOAEL for reproductive toxicity was considered to be 250 mg/kg bw/day for the MoS calculation, based on the reductions in mean pup weights per litter at 700 mg/kg bw/day, which were probably related to maternal toxicity.

Based on the results of a developmental toxicity study in rats, a NOAEL for maternal and for embryo-fetal toxicity was established at 250 mg/kg bw/day. Indeed, reductions in fetal body weight averages and reductions in the mean number of ossification sites in the caudal vertebrae and hind limbs occurred at 700 mg/kg bw/day, and were considered related to maternal toxicity, as these effects were concurrent with decreased maternal food consumption and body weights. These reductions in fetal body weights and ossification sites were not observed at lower dose levels, including 250 mg/kg bw/day, where evidence of maternal toxicity was not apparent.

S87 was considered to be of no concern regarding embryotoxicity or teratogenicity.

### **Mutagenicity / genotoxicity**

The genotoxicity of S87 was investigated in the three endpoints of genotoxicity: gene mutations, structural chromosome aberrations and aneuploidy. S87 did not induce gene mutations in four strains of *Salmonella typhimurium* (TA98, TA100, TA1535, TA1537) nor in the *E. coli* WP2 uvrA strain up to the concentration of 5250 µg/plate in the absence and in the presence of a rat liver metabolic activation system (S-9 MIX). However, S87 clearly induced micronuclei in cultured human peripheral blood lymphocytes in the absence and presence of S-9 mix. Results from subsequent 3D human reconstructed skin micronucleus test did not show any indication of mutagenic effect of S87. S87 has been also investigated for the induction of micronucleated polychromatic erythrocytes (mnPCEs) in the bone marrow of male and female Sprague-Dawley rats after repeated administration. Under the conditions of this *in vivo* study, S87 was negative in the bone marrow micronucleus test in male and female rats. Based on the data obtained in the *in vitro* test battery and *in vivo*, S87 was considered to have no genotoxic potential *in vivo*.

### **Carcinogenicity**

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### **Photo-induced toxicity**

The data provided did not show any evidence for phototoxicity.

### **Human data**

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### **Special investigation**

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#### **4. CONCLUSION**

*1. In light of the data provided, does the SCCS consider Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), safe when used as UV-filter in cosmetic products up to a maximum concentration of 3%?*

Based on the data submitted, the SCCS concluded that the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), as a UV-filter in cosmetic products up to a maximum concentration of 3%, is safe.

Inhalation toxicity was not assessed in this Opinion because no data were provided. Hence, this Opinion is not applicable to any sprayable products that could lead to exposure of the consumer's lung by inhalation.

*2. If not, what is according to the SCCS, the maximum concentration considered safe for Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) when used as UV-filter in cosmetic products?*

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*3. Does the SCCS have any further scientific concerns with regard to the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (C-1701 B\_C\_3) in cosmetic products?*

S87 is a secondary amine, and thus is prone to nitrosation and formation of nitrosamines. It should not be used in combination with nitrosating substances. The nitrosamine content should be < 50 ppb.

#### **5. MINORITY OPINION**

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## 6. REFERENCES

- 1 Meyer L. (2011). Characterization of "C-1701 B\_C\_3". BASF SE. study number 11L00388.
- 2 Meyer L. (2012). Characterization of "C-1701 B\_C\_3". BASF SE study number 12L00108.
- 3 Fux P. (2016). Certificate of Analysis for C-1701 B\_C\_3 including IR spectrum (Amendment No. 1). BASF Schweiz AG study number 16S01253.
- 4 Fux P. (2012). Quantification of 2-Ethoxyethanol and 3-Methoxypropyl- amine by GC-FID and quantification of Diethylsulfate by HS-GC-MS. BASF Schweiz AG study number 12Y57811.
- 5 Fux P. (2013). Water content. BASF Schweiz AG study number 11B00011.
- 6 Meyer L. (2012). 1<sup>st</sup> Amendment to final report. Characterization of "C-1701 B\_C\_3". BASF SE study number 11L00388.
- 7 Specker W. (2013) Impurity profile of C-1701 B\_C\_3 by HPLC/UV measurement. BASF Schweiz AG study number 13S01712.
- 8 Specker W (2017). Analytical Report - Impurity Profile of C-1701 B\_C\_3 samples by LC/MS and HPLC-DAD. (BASF, Order No. 17S02624; v3)
- 9 Winkler S. (2013). Water solubility. Siemens AG study number 20120207.06 draft.
- 10 Giesinger J. (2013). Solubility of C-1701 B\_C\_3 in cosmetic ingredients. BASF Grenzach GmbH Data sheet.
- 11 Winkler S. (2013). C-1701 B\_C\_3 Batch: C-1701/11. Partition coefficient n-Octanol/water A.8. (OECD 117) (HPLC method). Siemens AG study number 20120207.02.
- 12 Giesinger, J. (2013). Particle size distribution. BASF Grenzach GmbH study number GIJ-Malv-Rec610.
- 13 Winkler S. (2013). C-1701 B\_C\_3 Batch: C-1701/11. Boiling point A.2. (OECD 103, OCSPP 830.7220). Siemens AG study number 20120207.01.
- 14 Winkler S. (2013). C-1701 B\_C\_3 Batch: C-1701/11. Adsorption coefficient C.19. (OECD 121) Koc (HPLC method). Siemens AG study number 20120207.04.
- 15 Winkler S. (2013). C-1701 B\_C\_3 Batch: C-1701/11. Dissociation constant in water (OECD 112, OCSPP 830.7370). Siemens AG study number 20120207.05.
- 16 Kuchta (2012). Evaluation of physical and chemical properties according to Regulation (EC) No 440/2008 and Regulation (EC) No 1272/2008. BASF SE study number SIK-Nr. 12/1391.
- 17 Fux P. (2013). Determination of the melting point and melting heat of C-1701 B\_C\_3 by DSC. BASF Schweiz AG study number 12B020282b.
- 18 Carlson M.B. (2013). C-1701 B\_C\_3. Repeat dose 90-day toxicity study in Wistar Han rats by oral administration (gavage). Charles River Laboratories study number 20027338 (BASF project number 50C0473/11X497).

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

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- 19 Wareing B. (2012). C-1701 B\_C\_3. EpiDerm™ skin irritation test. BASF SE study number 61V0473/11A562.
- 20 Remmelle M. (2019a). C-1701 B\_C\_3: *In vitro* Skin Irritation Test (SIT) in Reconstructed Human Epidermis. BASF SE study number 68V0473/11A613.
- 21 Remmelle M. (2012). C-1701 B\_C\_3. Bovine corneal opacity and permeability test (BCOP test). BASF SE study number 63V0473/11A563.
- 22 Wareing B. (2012). C-1701 B\_C\_3. EpiOcularTM eye irritation test. BASF SE study number 62V0473/11A564.
- 23 Cannamela N. (2019). Test Item E212657. Ocular primary irritation, BCOP. Study performed on isolated bovine corneal, measurement of the bovine corneal opacity and permeability. IEC France, Study Number 190909RD.
- 24 Remmelle M. (2019b). C-1701 B\_C\_3: *In vitro* Eye Irritation Test (EIT) in Reconstructed Human Cornea. BASF SE study number 62V0473/11A614.
- 25 Matsuda A. (2012). Non-radioactive murine local lymph node assay (LLNA) with C-1701 B\_C\_3 according to OECD 429, OECD 442B, EC B.42 and OPPTS 870.2600. Ina Research Inc. study number ZB11327 (BASF project number 58V0473/11X188).
- 26 Blackstock C. (2013). The *in vitro* percutaneous absorption of C-1701 B\_C\_3 in a suncare formulation through human skin. Charles River Laboratories study number 792670.
- 27 Carlson M.B. (2013). Oral 14-day dose range-finding toxicity study of C-1701 B\_C\_3 in rats. Charles River Laboratories study number 20018415. BASF Project Number 99C0284/11X221
- 28 Carlson M.B. (2013). C-1701 B\_C\_3. Maternal toxicity study in Wistar Han rats (range-finding) by oral administration (gavage). Charles River Laboratories study number 20027339 (BASF project number 10R0473/11X485).
- 29 Carlson M.B. (2013). C-1701 B\_C\_3. Reproduction/developmental toxicity screening test in Wistar Han rats by oral administration (gavage). Charles River Laboratories study number 20027631 (BASF project number 80R0473/11X498).
- 30 Carlson M.B. (2013). C-1701 B\_C\_3. Prenatal developmental toxicity study in Wistar Han rats by oral administration (gavage). Charles River Laboratories study number 20027630 (BASF project number 30R0473/11X499).
- 31 Woitkowiak C. (2012). C-1701 B\_C\_3. *Salmonella typhimurium/Escherichia coli* reverse mutation test. BASF SE study number 40M0473/11M190.
- 32 Lloyd M. (2012). Induction of micronuclei in cultured human peripheral blood lymphocytes. Covance Laboratories Ltd study number 8256347 (BASF project number 33M0473/11X280).
- 33 Shambhu R. (2016). C-1701 B\_C\_3. *In Vitro* Micronucleus Test using Reconstructed skin Micronucleus (RSMN) assay in EpiDermTM. BioReliance Corporation study number AE19SF.358.BTL
- 34 Stankowski LF (2012). C-1701 B\_C\_3. Rat Bone Marrow Micronucleus Test with C-1701 B\_C\_3. BioReliance Study number AD48SR.126.BTL

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

- 35 Cetto V. (2012). C-1701 B\_C\_3. *In vitro* 3T3 NRU phototoxicity test. BASF SE study number 20V0473/11M325.
- 36 Matsuda A. (2013). Skin photosensitization study with C-1701 B\_C\_3 in guinea pigs. Ina Research Inc. study number ZB12180 (BASF project number 47H0473/11X539).
- 37 Sokolowski A. (2013). Photomutagenicity in a *Salmonella typhimurium* and *Escherichia coli* reverse mutation assay with C-1701 B\_C\_3. Harlan CCR study number 1510400 (BASF project number 41M0473/11X581).
- 38 Dahl EL, Curren R, Barnett BC, Khambatta Z, Reisinger K, Ouedraogo G, Faquet B, Ginestet AC, Mun G, Hewitt NJ, Carr G, Pfuhler S, Aardema MJ. The reconstructed skin micronucleus assay (RSMN) in EpiDerm™: Detailed protocol and harmonized scoring atlas. *Mutation Research/Genetic Toxicology and Environmental Mutagenesis* 2011; 720(1-2):42-52
- 39 Fleeman TL, Cappon GD, Chapin RE and Hurt ME (2005). The effects of feed restriction during organogenesis on embryo-fetal development in the rat. *Birth Defects Res B Dev Reprod Toxicol* 74(5): 442-449.
- 40 Harbell J.W., Le Varlet, B., Marrec-Fairley, M., Kaluzhny, Y., McNamee, P. Poster #378, Society of Toxicology, (2009). <https://www.mattek.com/reference-library/colipa-program-on-optimization-of-existing-in-vitro-eye-irritation-assays-for-entry-into-formal-validation-technology-transfer-and-intrainter-laboratory-evaluation-of-epiocular-assay-for-chemicals/>
- 41 MatTek Corporation, Ashland, MA 01721, USA (2010): EpiOcularTM human cell construct: Procedure details, Version 3.1a

Database search for references

No database search was performed for the present Submission.

## 7. GLOSSARY OF TERMS

See SCCS/1602/18, 10th Revision of the SCCS Notes of Guidance for the Testing of Cosmetic Ingredients and their Safety Evaluation – from page 141

### Glossary from the Applicant

A	Absorbance
AAC	9-Aminoacridine
ANOVA	Analysis of variance
2-AA	2-Aminoanthracene
BCOP	Bovine corneal opacity and permeability
BrdU	Bromodeoxyuridine
BSA	Bovine serum albumin
bw	Body weight
CAS	Chemical Abstracts Service
CHO	Chinese hamster ovary
CPA	Cyclophosphamide

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

CPZ	Chlorpromazine
C <sub>max</sub>	Maximum concentration
DG	Day of gestation
DL	Day of lactation
DMF	N,N-Dimethylformamide
DMSO	Dimethyl sulfoxide
DPP	Day <i>post partum</i>
DSC	Differential scanning calorimetry
ɛ	Specific absorptivity
EC <sub>50</sub>	Effective concentration 50
EMS	Ethyl methanesulfonate
EPA	Environmental Protection Agency
F	Filial generation
FID	Flame ionisation detector
FOB	Functional observation battery
FTIR	Fourier transform infrared
GC	Gas chromatography
GI	Gastrointestinal
GLP	Good laboratory practice
HCA	α-Hexyl cinnamic aldehyde
his	Histidine
HPLC	High-performance liquid chromatography
HPRT	Hypoxanthine-guanine phosphoribosyl transferase
HS	Headspace
INCI	International Nomenclature of Cosmetic Ingredients
<i>i.p.</i>	Intraperitoneal (administration)
IR	Infrared
IVIS	<i>In vitro</i> irritancy score
Koc	Adsorption coefficient
LC	Liquid chromatography
LD	Lethal dose
LLNA	Local lymph node assay
LLOQ	Lower limit of quantification
MCA	Methylcholanthrene
MCH	Mean corpuscular hemoglobin
MCHC	Mean corpuscular hemoglobin concentration
MCV	Mean corpuscular volume
MMC	Mitomycin C
mn	Micronucleated
MNBN	Micronucleated binucleate cells
MNNG	N-methyl-N'-nitro-N-nitrosoguanidine
Mos	Margin of safety
MS	Mass spectrometry
MTT	Tetrazolium salt
MW	Molecular weight
n	Number of samples
NC	Negative control
NCE	Normochromatic erythrocytes
ND	No data

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

n.d.	Not determined
NMR	Nuclear magnetic resonance
no.	Number
NOAEL	No Observed Adverse Effect Level
NOPD	4-Nitro-o-phenylenediamine
NRU	Neutral red uptake
n.s.	Not significant
4-NQO	4-Nitroquinoline-N-oxide
OCSPP	Office of Chemical Safety and Pollution Prevention
OD	Optical density
OECD	Organisation for Economic Co-operation and Development
OPPTS	Office of Prevention, Pesticides and Toxic Substances
P	Parental generation
PBS	Phosphate buffered saline
PC	Positive control
PCE	Polychromatic erythrocytes
PEG	Polyethylene glycol
PHA	Phytohaemagglutinin
PIF	Photo-irritancy factor
PIT	Preincubation test
pKa	Dissociation constant
PND	Postnatal day
RI	Replication index
RSD	Relative standard deviation
SCCNFP	Scientific Committee on Cosmetic Products and Non-food Products
SCCS	Scientific Committee on Consumer Safety
SD	Standard deviation
SDS	Sodium dodecyl sulfate
SED	Systemic exposure dose
SI	Stimulation index
SPT	Standard plate test
TCSA	3,3',4',5-Tetrachlorosalicylanilide
trp	Tryptophane
UV	Ultraviolet
UVA	Ultraviolet A
UVB	Ultraviolet B
VC	Vehicle control
VIN	Vinblastine
VIS	Visible absorption spectroscopy

## 8. LIST OF ABBREVIATIONS

See SCCS/1602/18, 10th Revision of the SCCS Notes of Guidance for the Testing of Cosmetic Ingredients and their Safety Evaluation – from page 141