Safety Assessment of Zanthoxylum piperitum-Derived Ingredients as Used in Cosmetics

Status:Draft Final Report for Panel ReviewRelease Date:August 18, 2023Panel Meeting Date:September 11-12, 2023

The Expert Panel for Cosmetic Ingredient Safety members are Chair, Wilma F. Bergfeld, M.D., F.A.C.P.; Donald V. Belsito, M.D.; David E. Cohen, M.D.; Curtis D. Klaassen, Ph.D.; Allan E. Rettie, Ph.D.; David Ross, Ph.D.; Thomas J. Slaga, Ph.D.; Paul W. Snyder, D.V.M., Ph.D.; and Susan C. Tilton, Ph.D. The Cosmetic Ingredient Review (CIR) Executive Director is Bart Heldreth, Ph.D., and the Senior Director is Monice Fiume. This safety assessment was prepared by Wilbur Johnson, Jr., M.S., former Senior Scientific Analyst/Writer, and Regina Tucker, M.S., Scientific Analyst/Writer, CIR.

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INGREDIENT/FAMILY Zanthoxylum piperitum - Derived Ingredients

MEETING September 2023





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Memorandum

To:	Expert Panel for Cosmetic Ingredient Safety Members and Liaisons
From:	Regina Tucker, M.S., Scientific Analyst/Writer, CIR
Date:	August 18, 2023
Subject:	Safety Assessment of Zanthoxylum piperitum-Derived Ingredients as Used in Cosmetics

Enclosed is a Draft Final Report of the Safety Assessment of Zanthoxylum piperitum-Derived Ingredients as Used in Cosmetics (identified in the pdf as *report_ZanthoxylumPiperitum_092023*). At the June 2023 meeting, the Panel issued a Tentative Report for public comment with the conclusion that the 4 Zanthoxylum piperitum-derived ingredients named in this report are safe in cosmetics in the present practices of use and concentration described in this safety assessment when formulated to be non-sensitizing.

No unpublished data were submitted since the issuing of the Tentative Report. At the June 2023 meeting the Panel considered additional published data that might be included in the report. It was decided that one additional study on *Zanthoxylum piperitum*-derived ingredients should be incorporated. Those data consists of additional genotoxicity details and have been incorporated into this report and is indicated by highlighting.

Comments on the Tentative Report provided by the Council (*PCPCcomments_ZanthoxylumPiperitum_092023*) that are also included in this submission were addressed, as indicated in the responses to these comments (*response_PCPCcomments_ZanthoxylumPiperitum_092023*).

The following documents are also included in this packet:

- report history (history ZanthoxlumPiperitum 092023)
- data profile (*dataprofile ZanthoxlumPiperitum 092023*)
- search strategy (*search ZanthoxlumPiperitum 092023*)
- flow chart (*flow ZanthoxlumPiperitum 092023*)
- transcripts (transcripts ZanthoxylumPiperitum 092023)

The Panel should carefully consider the Abstract, Discussion, and Conclusion presented in this report. If these are satisfactory, the Panel should issue a Final Report.



Memorandum

TO:Bart Heldreth, Ph.D.Executive Director - Cosmetic Ingredient Review

- **FROM:** Alexandra Kowcz, MS, MBA Industry Liaison to the CIR Expert Panel
- **DATE:** July 25, 2023
- **SUBJECT:** Tentative Report: Safety Assessment of *Zanthoxylum piperitum*-Derived Ingredients as Used in Cosmetics (release date: June 28, 2023)

The Personal Care Products Council respectfully submits the following comments on the tentative report, Safety Assessment of *Zanthoxylum piperitum*-Derived Ingredients as Used in Cosmetics.

Method of Manufacture, Zanthoxylum Fruit Extract - Please add "piperitum" to the section heading. Please add "fruit extract" after "Eleven grams of *Zanthoxylum piperitum* were obtained."

Method of Manufacture – The definition of the oil ("obtained from the fruit and fruit pericarp of *Zanthoxylum piperitum*") does not give any insight into the method of manufacture of the essential oil and should be deleted from this section. The definition of the peel water ("the aqueous solution of the steam distillate obtained from the peel") does give insight into the method of manufacture (steam distillation). The following sentence should be moved under the Zanthoxylum Piperitum Peel Water subheading: "In some cases, the definition of the ingredients, as given in the Dictionary, provides insight as to the method of manufacture."

ADME – If correct, it would be helpful to state that hydroxy- α -sanshool was the only compound from *Zanthoxylum piperitum* that was measured. If another of the 6 compounds was from *Zanthoxylum piperitum*, additional results should be stated.

Anti-Carcinogenicity, *Zanthoxylum piperitum* extract – Usually water is considered a negative control. Is it correct that it was used as a "positive control" in the study from reference 25? Which control was used for comparison, the water control, or the DMSO (solvent) control?

Draft Report Comment Responses

Phytosteryl Glutamates – September 2023-Regina Tucker									
Comment Submitter: Personal Care Products Council Date of Submission: July 25, 2023									
Comment	Response/Action								
Method of Manufacture, Zanthoxylum Fruit Extract - Please add "piperitum" to the section heading. Please add "fruit extract" after "Eleven grams of Zanthoxylum piperitum were obtained."	Addressed								
Method of Manufacture – The definition of the oil ("obtained from the fruit and fruit pericarp of Zanthoxylum piperitum") does not give any insight into the method of manufacture of the essential oil and should be deleted from this section. The definition of the peel water ("the aqueous solution of the steam distillate obtained from the peel") does give insight into the method of manufacture (steam distillation). The following sentence should be moved under the Zanthoxylum Piperitum Peel Water subheading: "In some cases, the definition of the ingredients, as given in the Dictionary, provides insight as to the method of manufacture."	Addressed								
ADME – If correct, it would be helpful to state that hydroxy- α -sanshool was the only compound from Zanthoxylum piperitum that was measured. If another of the 6 compounds was from Zanthoxylum piperitum, additional results should be stated.	Addressed								
Anti-Carcinogenicity, Zanthoxylum piperitum extract – Usually water is considered a negative control. Is it correct that it was used as a "positive control" in the study from reference 25? Which control was used for comparison, the water control, or the DMSO (solvent) control?	Source material states: "Distilled water was used as positive control and DMSO as solvent control".								

CIR History of:

Zanthoxylum piperitum- Derived Ingredients

August 2022

A Scientific Literature Review (SLR) on Zanthoxylum piperitum-Derived Ingredients was issued on August 3, 2022.

September 2022

Comments on the Scientific Literature Review were received.

Draft Report, Teams/Panel: December 05-06, 2022

Comments on the SLR and the following unpublished data, all received from the Council, have been added to the draft report that is included for the Panel's review.

- Method of manufacture and composition data on Zanthoxylum Piperitum Seed Oil
- Method of manufacture and composition data on Zanthoxylum Piperitum Peel Extract.

The Panel issued an IDA for the following 4 Zanthoxylum piperitum derived ingredients

Zanthoxylum Piperitum Fruit Extract Zanthoxylum Piperitum Oil Zanthoxylum Piperitum Peel Extract Zanthoxylum Piperitum Peel Water

The additional data needed to determine safety for these cosmetics ingredients are:

- Method of manufacture for Zanthoxylum Piperitum Fruit Extract and Zanthoxylum Peel Water
- Impurities data for Zanthoxylum Piperitum Peel Water
- Further concentration of use data, if available

Draft Tentative Report, Teams/Panel June 5-6, 2023.

Tentative Report issued at June meeting. 2023 VCRP updated. Additional updates made based on published studies submitted by Dr. Belsito.

Draft Final Report Teams/Panel September 11-12, 2023

Additional update made based on published study submitted by Dr. Belsito

	Zanthoxylum piperitum-derived Ingredients Data Profile* -September 2023 - Wilbur Johnson/Regina Tucker																													
					Tox kine	oxico- inetics Acute To		K F	Repeated Dose Tox		DART		Genotox		Carci		Anti Carci	Dermal Irritation		al ion	Dermal Sensitization		Ocular Irritation		Clinical Studies					
	Reported Use	GRAS	Method of Mfa	Constituents	Impurities	Dermal Penetration	ADME	Dermal	Oral Inhalation	Dermal	Oral	Inhalation	Dermal	Oral	In Vitro	In Vivo	Dermal	Oral	In Vitro	In Vitro	Animal	Human	In Vitro	Animal	Human	Phototoxicity	In Vitro	Animal	Case Renort	Other Clinical Reports
Zanthoxylum Piperitum Fruit Extract	Χ	Χ	Χ	Χ	Χ		Χ												Χ			*								X
Zanthoxylum Piperitum Oil			Х	Χ	Χ										Χ	Χ														
Zanthoxylum Piperitum Peel Extract	Χ		Χ	Χ	Χ																	*								
Zanthoxylum Piperitum Peel Water			Χ																											
Zanthoxylum Piperitum Extract				Χ		Χ									Χ				X						Χ					

X - indicates that data were available in a category for the ingredient * - indicates data are potentially on fruit or peel

Zanthoxylum piperitum-derived Ingredients-06/2023

Ingredient	CAS #	InfoB ase	SciFinder	PubMed	FDA	EU	ЕСНА	IUCLID	SIDS	HPVIS	NICNAS	NTIS	NTP	WHO	FAO	ECE- TOC	Web
Zanthoxylum Piperitum Fruit Extract	97404-53-0	Yes		1/2	No	No	No	No	No	No	No	No	No	No	No	No	Yes
Zanthoxylum Piperitum Oil	97404-53-0	Yes		11/13	No	No	No	No	No	No	No	No	No	No	No	No	Yes
Zanthoxylum Piperitum Peel Extract	97404-53-0	Yes		0/0	No	No	No	No	No	No	Yes	No	No	No	No	No	Yes
Zanthoxylum Piperitum Peel Water	97404-53-0	Yes		0/0	No	No	No	No	No	No	No	No	No	No	No	No	Yes
Zanthoxylum piperitum + CAS No. 97404-53-0				24/70													Yes

Search Strategy

[document search strategy used for SciFinder, PubMed, and Toxnet] [identify total # of hits /# hits that were useful or examined for usefulness] InfoBase (self-reminder that this info has been accessed; not a public website) - <u>http://www.personalcarecouncil.org/science-safety/line-infobase</u>

ScfFinder (usually a combined search for all ingredients in report; list # of this/# useful) - <u>https://scifinder.cas.org/scifinder</u> PubMed (usually a combined search for all ingredients in report; list # of this/# useful) - <u>http://www.ncbi.nlm.nih.gov/pubmed</u>

Toxnet databases (usually a combined search for all ingredients in report; list # of this/# useful) – <u>https://toxnet.nlm.nih.gov/</u> (includes Toxline; HSDB; ChemIDPlus; DAR; IRIS; CCRIS; CPDB; GENE-TOX)

FDA databases – <u>http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm</u> (CFR); then, list of all databases: <u>http://www.fda.gov/ForIndustry/FDABasicsforIndustry/ucm234631.htm</u>; then, <u>http://www.accessdata.fda.gov/scripts/fcn/fcnnavigation.cfm?rpt=eafuslisting&displayall=true</u> (EAFUS); <u>http://www.fda.gov/food/ingredientspackaginglabeling/gras/default.htm</u> (GRAS); <u>http://www.fda.gov/food/ingredientspackaginglabeling/gras/scogs/ucm2006852.htm</u> (SCOGS database); <u>http://www.fda.gov/food/ingredientspackaginglabeling/gras/scogs/ucm2006852.htm</u> (SCOGS database); <u>http://www.fda.gov/food/ingredientspackaginglabeling/gras/scogs/ucm2006852.htm</u> (SCOGS database); <u>http://www.fda.gov/Drugs/InformationOnDrugs/default.htm</u> (drug approvals and database); <u>http://www.fda.gov/downloads/AboutFDA/CentersOffices/CDER/UCM135688.pdf</u> (OTC ingredient list); <u>http://www.accessdata.fda.gov/scripts/cder/iig/</u> (inactive ingredients approved for drugs)

EU (European Union); check CosIng (cosmetic ingredient database) for restrictions and SCCS (Scientific Committee for Consumer Safety) opinions - <u>http://ec.europa.eu/growth/tools-databases/cosing/</u>

ECHA (European Chemicals Agency – REACH dossiers) – <u>http://echa.europa.eu/information-on-chemicals;jsessionid=A978100B4E4CC39C78C93A851EB3E3C7.live1</u>

IUCLID (International Uniform Chemical Information Database) - <u>https://iuclid6.echa.europa.eu/search</u> OECD SIDS documents (Organisation for Economic Co-operation and Development Screening Info Data Sets)-<u>http://webnet.oecd.org/hpv/ui/Search.aspx</u>

HPVIS (EPA High-Production Volume Info Systems) - https://ofmext.epa.gov/hpvis/HPVISlogon

NICNAS (Australian National Industrial Chemical Notification and Assessment Scheme)- <u>https://www.nicnas.gov.au/</u> NTIS (National Technical Information Service) - <u>http://www.ntis.gov/</u>

NTP (National Toxicology Program) - http://ntp.niehs.nih.gov/

WHO (World Health Organization) technical reports - <u>http://www.who.int/biologicals/technical_report_series/en/</u> FAO (Food and Agriculture Organization of the United Nations) - <u>http://www.fao.org/food/food-safety-quality/scientific-advice/jecfa-additives/en/</u> (FAO);

FEMA (Flavor & Extract Manufacturers Association) - <u>http://www.femaflavor.org/search/apachesolr_search/</u> Web – perform general search; may find technical data sheets, published reports, etc ECETOC (European Center for Ecotoxicology and Toxicology Database) - <u>http://www.ecetoc.org/</u>

Botanical Websites, if applicable

Dr. Duke's <u>https://phytochem.nal.usda.gov/phytochem/search</u> Taxonomy database - <u>http://www.ncbi.nlm.nih.gov/taxonomy</u> GRIN (U.S. National Plant Germplasm System) - <u>https://npgsweb.ars-grin.gov/gringlobal/taxon/taxonomysimple.aspx</u> Sigma Aldrich plant profiler <u>http://www.sigmaaldrich.com/life-science/nutrition-research/learning-center/plant-profiler.html</u>

Fragrance Websites, if applicable

IFRA (International Fragrance Association) – <u>http://www.ifraorg.org/</u> RIFM (the Research Institute for Fragrance Materials) should be contacted

Qualifiers	
Absorption	Gen
Acute	Irrit
Allergy	Met
Allergic	Mut
Allergenic	Mut
Cancer	Pene
Carcinogen	Perc
Chronic	Pha
Development	Rep
Developmental	Rep
Excretion	Rep
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denotoxic critation Metabolism Mutagen Mutagenic enetration ercutaneous harmacokinetic depeated dose deproduction deproductive Sensitization Skin Subchronic Teratogen Teratogenic Toxic Toxicity Toxicokinetic Toxicology Tumor

DECEMBER 2022 PANEL MEETING – INITIAL REVIEW/DRAFT REPORT

Belsito Team – December 5, 2022

DR. BELSITO: Okay. So, Zanthoxylum piperitum. There was a Wave 3 on this as well, to which I contributed. That's under -- down here. Okay.

DR. RETTIE: These abstracts mostly have to do with --

DR. BELSITO: Biological effects.

DR. RETTIE: -- a bewildering array of biological effects.

DR. BELSITO: But normally we put those in. But also, the Gwon paper had a number of references -- I think six -- to other papers that weren't included that looked at composition that I think need to be included. So if you look at the Gwon paper in the introduction, they refer specifically to --

DR. RETTIE: So, one of these that popped up here a couple of times in the abstracts here was the bone protective -

DR. BELSITO: Right.

DR. RETTIE: So I'm wondering about are there preparations where, like a gel is rubbed on your gums? And if there is, is that something that comes under this committee's purview?

DR. BELSITO: Depends upon if it were marketed as something that would improve -- that would change the structure, then it would not come under our purview, it would be considered a drug. So I would think it would be hard to come up with something that was saying that it would improve, you know, bone resorption or something and be a cosmetic.

DR. RETTIE: Under drugs then.

DR. BELSITO: Right.

MS. FIUME: So Don, for the information for a lot of it that you had forwarded; typically, what we have been doing is if these papers demonstrate this activity, we will include it under non-cosmetic use because it wasn't really affecting cosmetic safety. Is this something you'd want to see more in depth under other relevant reports or is reporting these types of activities okay under non-cosmetic use with the reference?

DR. BELSITO: Yeah, I mean, I think it can be put under non-cosmetic use, but just to know that -- because normally we look at, you know, other biological effects: immunomodulatory, anticarcinogenesis, things like that. And one of the reports was on anticarcinogenesis. So, I just thought that they were the types of things that normally we would put into a report.

DR. SNYDER: Well, certainly additional composition data should be gleaned from those.

MS. FIUME: I guess, specifically, I was talking about the papers maybe addressing rheumatoid arthritis or periodontal disease.

DR. BELSITO: Right.

MS. FIUME: We might say that these are used to address periodontal disease just with a citation and no detail, under non-cosmetic use. So, for those types, is that sufficient or would you want details somewhere in the report?

DR. BELSITO: You know, I mean, I'm fine with mentioning it, I mean, that we're aware of it. Because it is -- you know, my understanding of how we address these botanicals are obviously, there were a number of papers that we're looking at specific ingredients that were extracted. I didn't include those. But when there is information about the whole plant, because that's what we're looking at, we usually include that data.

So that's why I sent them along because those specific articles were looking at whole plant extract, not just a specific chemical from the plant. Certainly, and potentially, in levels much higher than what we're looking at.

But in the Gwon paper, the one that looks at the effect on adipocytes and weight loss, there are a number of references talking about aliphatic acid amides, terpenoids, flavonoids, alkaloids and other phenolics that I didn't have time to look into, but they may give us more information about composition, which we're really lacking here. So, I think we need to look into those.

MS. TUCKER: And so with the Gwon paper, my understanding is that you would like to see that data reflected in the non-cosmetic use section?

DR. BELSITO: Well, for the effect on adipocytes, Regina. But if you look, there's reference 13, 14, 15, 16, 17 and 18 and 19 that may shed light on composition that haven't been included in this report.

MS. TUCKER: Okay. Sure. Sure. And I do think I was able to look at one of the references on flavonoids. So, I can go back through and look at those.

DR. BELSITO: Yeah. Because right now, as it exists, this is really the first time that we're looking at this. One of the questions that CIR was asking us is whether we wanted to look at Zanthoxylum piperitum seed oil, should be included in the report. My original impression was, no, not if it only functions as a flavor or fragrance, but it is a component of the extract, as I understand it. So, I think we sort of have to look at the oil to understand the whole extract.

DR. SNYDER: The extract is GRAS, right?

DR. BELSITO: Right. So, you don't think we need to look at the oil?

DR. SNYDER: Well, I think we can add it but I don't -- I mean, that's what I had a question by, I have to see the whole report. It's a very different composition versus the fruit of the peel, which are the other original four ingredients are deriving from. So that was my only question was in regards to adding it because the composition is different.

DR. BELSITO: True. Okay.

DR. SNYDER: I mean, it's GRAS, but it's a component of the extract, which is GRAS.

DR. BELSITO: So, then don't include the oil because we're clearing systemic toxicity by saying that the fruit and the peel are GRAS?

DR. SNYDER: Well, no, the extract, yeah. Yeah, I do -- I have extract as GRAS. I don't know if that just means the fruit or the peel extract.

DR. BELSITO: Well, it later on goes to say --

DR. RETTIE: I found this one very difficult to work through with all the different types of extracts that were discussed.

DR. BELSITO: Right.

DR. RETTIE: Even getting to the point for the peel extract, where there were I think three extract procedures provided. And I just had no idea which one was relevant to the products that we were --

DR. BELSITO: It's a huge problem for this panel, Allan, and also for, you know, the fragrance panel. Because depending upon what you extract these plants with, it can result in something totally different as you see.

DR. RETTIE: And they used t-butyl ether for one, set of extracts, methanol for another. And you would expect -- and the composition tables reflect a different composition for those two extractions. But then there's a third one, a butylene glycolic extract. And there was there no information about the constituents that one peels over that. So what would you do with that?

MS. FIUME: You can split the conclusion based on solvent. I think we've done that in the past.

DR. RETTIE: Can we get the information about the 12 peel extracts that are in use, and know which extraction process they refer to? Or if all of them cover? Can we get that info?

MS. FIUME: It can definitely be asked for. And when the writer knows what the solvent is, we do try and include that in the text in parentheses.

DR. BELSITO: But before we get into that, is the decision of our group not to include the oil because it's only a flavoring fragrance? Is that what we want to do?

DR. SNYDER: Yes. And it's a significant different composition.

DR. BELSITO: Okay.

MS. TUCKER: So the decision is not to add the seed oil --

DR. BELSITO: For us.

MS. TUCKER: -- in part due to the composition?

DR. BELSITO: So we're going to delete that from the list of the ingredients we're reviewing. Not only because of the composition, but simply because it's a fragrance flavoring and that's not our purview.

MS. TUCKER: Thank you. So, on my end I just would like to make sure that I have everything reflected. The data that you submitted, Dr. Belsito, I'm going to place that data appropriately throughout the document so that the information is reflected for the panel. And we're not adding the seed oil, in part, because of the composition and it's not in our purview. Thus far, is there anything that I'm missing?

DR. BELSITO: Yeah. We're still going through it.

MS. TUCKER: No problem. Got you.

DR. RETTIE: One of the ingredients is peel water.

DR. BELSITO: Right.

DR. RETTIE: And I wondered if -- what did I write here. Is peel water covered by the --

DR. SNYDER: By the extract.

DR. RETTIE: -- by the more aqueous extract? Is that the moisture that we saw in another one, in the water?

DR. BELSITO: Yeah. Sometimes you get information on that by the description of the material because we have no method of manufacture, right?

DR. RETTIE: I don't think we have any information on composition on peel water.

DR. BELSITO: Right.

DR. RETTIE: We have an ethanolic peel extract. I'm not sure we have much in the way of composition for that one.

DR. BELSITO: Yeah. What we have on peel water is, it's the aqueous solution of the steam distillate obtained from the peel. And for the peel extract, we have it's the extract of the peels. And the information we have on the extracts were all with organic solvents, not with water. So one would expect that the water might be very different from the peel extracts, no?

DR. RETTIE: Well, even at the level of the organic extracts, if you look at the composition table for the fruit pericarp ethyl acetate extracts, it's a listing of half-a-dozen dodecatrienamides that are not reflected in the more limiting general acetate components of everything else. So, it just all seems to be up in the air as far as composition is concerned. I couldn't easily move from one to the other to feel like I knew what was going on.

DR. BELSITO: Okay. But we're looking at whole plant and from what I can gather --

DR. SNYDER: With a max use of .0022 percent.

DR. RETTIE: Yes.

DR. BELSITO: The fruit and the peel are both food uses. Correct?

DR. SNYDER: Yes.

DR. BELSITO: And so they're GRAS. So that normally gets rid of tox endpoints.

DR. RETTIE: Yeah.

DR. BELSITO: So then you're looking at sensitization and irritation.

DR. SNYDER: And 2 percent on the extract.

DR. BELSITO: Right. But I had a question about that. The data was not published on that. And why aren't my notes connecting to the areas -- so the data on the sensitization was not published. So, we don't know if this included the fruit and the peel or just the fruit. Is that correct? Because I tried looking for it.

So, this was a super critical carbon dioxide extract of Zanthoxylum piperitum. It was 2 percent HRIPT. It was just a comment. If it was in the report that you saw, what was -- was it the fruit, the whole plant? Do you know, Regina?

DR. SNYDER: Food extract, peel extract or the whole thing?

MS. FIUME: So Regina, I think this is referring back to your question in the intro for the NICNAS report, is that it's unclear, right?

MS. TUCKER: Yes. So, it was unclear. It just says the extract, so we don't know which extract it was.

DR. BELSITO: Okay.

MS. FIUME: So, we've noted that in the introduction.

DR. BELSITO: So, it should be noted here too.

MS. TUCKER: Okay.

DR. SNYDER: Unspecified.

DR. BELSITO: Right. So, does that help our sensitization or are we asking for additional sensitization?

DR. SNYDER: That's at 2 percent and we're at .00.

DR. BELSITO: Right.

DR. SNYDER: .01 for the fruit and .002 for the peel max, so I would think that would be sufficient. The composition is similar.

DR. BELSITO: Well, we're going to go with formulated to be non-sensitizing because it has terpenes, right?

DR. SNYDER: Yes.

DR. BELSITO: So, I thought in the discussion, first of all, we need the botanical and respiratory boilerplates. That it's GRAS, so you know we have some tox endpoints but we feel they're cleared by the GRAS status. We're eliminating the oil. We have sensitization on an extract. We're not exactly certain what it's an extract of, but it was done at two percent and max use concentration is at --

DR. SNYDER: .01 for peel.

DR. BELSITO: .01. And I guess we could go insufficient for ocular toxicity, but I don't think so since we only ask for it if available. It has terpenes, so it needs to be formulated when non-sensitizing. So, my question was can we go ahead where the safe as used or does the manufacture and composition, for the fruit and peel, really bother you? I didn't think so because of the GRAS status for these, but.

DR. RETTIE: It only bothered me because the composition data was all over the place for the different ingredients. I was flailing around thinking what to do.

DR. BELSITO: So, then let's go back to the tables which we're being asked to look at here.

DR. SNYDER: Use tables.

DR. BELSITO: Use tables. And quite honestly, I think both tables are extremely useful. First, it's helpful for me to look for certain endpoints and the second, to see specific areas of use. But in this case, I was really shocked by the fact that they were getting use in only one of the body and hand spray for the fruit extract.

You know, has this happened before where we're assuming that -- I mean, there are 70 moisturizing products out there and we have no reported concentration of use. There are 52 face and neck, we have no reported concentrations of use. Without that kind of table, I wouldn't know how poor the response from industry is. This is disturbing. Has this happened before and we've not been made aware of it or?

DR. EISENMANN: It happens all the time because I'm only surveying the people that will respond to the surveys. I mean, I've tried to reach out to -- it's not ICMAD anymore, but that group and I just don't get many responses.

MS. KOWCZ: IBA.

DR. EISENMANN: Yeah.

DR. BELSITO: I'm sorry, I didn't hear you.

DR. EISENMANN: Independent Beauty Association is what they are now. I've tried reaching out to them to get them to participate also.

MS. KOWCZ: That would be good.

DR. EISENMANN: I could only get some smaller companies, I really don't get much of a response from them, if any.

I mean, as we go, it's getting more and more that I get -- you know, the high use ingredients, yeah, I get a reasonable response. But these ingredients that have fewer uses, a lot of our companies are not using them, so I don't get a response.

DR. BELSITO: But they don't have fewer uses. In the case of the fruit extract, I mean, the majority of uses, we have no reported concentration.

DR. EISENMANN: It's just the companies that -- I mean, there's plenty of companies that participate in VCRP that aren't our members.

DR. RETTIE: So, we can't evaluate those maximum concentration of use in .01 percent reported for an extract when there are no reports for substitutes.

DR. BELSITO: So, how does this work? When we say safe as used, when it's used in 70 moisturizing products and we don't know the concentration, does that mean it's safe as used up to .01 percent because that's the highest concentration?

DR. SNYDER: That's what it means.

MS. FIUME: Yeah. Because it's as reported in this document.

DR. SNYDER: As reported.

MS. FIUME: I mean, we can add a paragraph in, if you'd like, to state that this is the only concentration of use reported and therefore that's what is being considered for the conclusion. But that's what our conclusion means.

DR. SNYDER: What's more alarming to me were there were 180 uses and only six reported at .1 percent.

DR. BELSITO: That's what I mean. That's the vast majority we don't know what they're being used at.

DR. SNYDER: Right. I mean, I wish there was a way we can combine the two tables because I'm so used to looking at the old tables of what data needs I'm going to look for in the report. But this new table format is hugely informative and it has made me aware of just what Don brought up, I couldn't see that before.

DR. BELSITO: Yeah, I mean the old table are good because they tell us, okay, this is what I'm looking for, for tox endpoints. This is what I'm looking for, for sensitization, irritation endpoints to clear this and I can do it very quickly as opposed to the new tables where --

DR. SNYDER: Yeah, because the leave-on and rinse off is the first thing I go to.

DR. BELSITO: Right.

DR. SNYDER: Because I look for the max concentration for leave-on. And then that by fault tells me where I want to go for tox data and for sensitization data.

DR. BELSITO: Right.

MS. FIUME: So my concern was based on how products have changed, we include that, but we don't know -- I don't feel confident that it's truth because every shampoo is being listed, and every conditioner is being listed, as a rinse off --

DR. BELSITO: As a rinse off. And there are dry shampoos.

MS. FIUME: -- and non-aerosol. Right. So, that's where -- I mean, obviously, you know, I took up the torch of trying to change tables because I was concerned that we weren't capturing the information correctly. That's why I tried to add at least a likely exposure site so that the area of skin, but --

DR. SNYDER: Well, in doing so, you brought to our attention another deficiency.

MS. FIUME: I just don't know how to accurately capture the true leave-on concentration, which is what would be the one that would concern me because if we only have shampoos and it's used at 40 percent, we're capturing that as a rinse-off, but it may not be. Or if it's conditioner -- I should say a conditioner. It may not be.

DR. BELSITO: Right. But just like you say, it's not possible, or it may be a spray but it's not specified, you could do another footnote to say that it's reported as a shampoo use, presumed to be rinse off but not verified or something like that.

MS. FIUME: Would a good compromise be rather than -- I don't know if that would give you any information. Let's say we could identify the possible types of spray, powder, leave-on/rinse off, but then if we don't include a concentration, then that's not giving you any information either.

DR. BELSITO: Right. No, I mean, it's just that the old tables, you know, what you're hearing from Paul and I is that they set our mind to look at specific tox endpoints with those in mind. Knowing that, you know, particularly with shampoos, so now we need to then look at a shampoo and also think about, well what if it's not diluted? But the other table is nice, draws attention to the fact that --

DR. SNYDER: We don't have a lot of data.

DR. BELSITO: -- we don't have a lot of data.

DR. EISENMANN: One thing to note, when I do send out the surveys, I have been including that shampoos are listed as rinse off. So sometimes people put dry shampoos into other hair care products rather than shampoo.

I mean, but that can't guarantee what they're telling me, though, because I don't have access to their database. So I don't really know for sure, you know, how everybody classifies their products. But I do let them know how CIR has been putting it as rinse off versus leave-on. Whether or not they pay attention to that, I don't know that.

DR. SNYDER: I mean, the top table, you look at it and it says leave-on 157 uses, .01 percent and six uses at .022. But then when I looked at the bottom table, I was just struck by that concentration of use represented so few of those ingredients. And I've never looked it that way previously.

MS. FIUME: We've had discrepancies between VCRP and concentration of use. This is the first one that I can recall that there's only been one concentration of use reported for something that has so many uses. It may have happened once before because that's where we even tried to call it out -- in text -- saying even though this has the highest, you know, use report in the VCRP, this is the only use reported in the concentration of use survey.

DR. SNYDER: I think that needs to be in the discussion with the data that we're looking at.

DR. RETTIE: It seems to me some consolidation of Tables 8 and 9 might be considered, where you mostly have everything in Table 9 but you just add this first part here, this leave on and rinse off section gets incorporated in there at the top. And maybe, you just mentioned the maximum concentration of reported use up there as well.

DR. BELSITO: But what Monice is saying, is that the concern that has been building with her over time, is that very frequently she's just guesstimating that it's a rinse off when she doesn't actually know that it's a rinse off. And therefore, there could be inaccuracies in the table. But I think for us, it is helpful, and we would know that -- I guess we don't know from looking at categories, but then we would know from Table 2 the range for shampoos, non-coloring.

DR. SNYDER: Does it have to be an either or, could we have both?

DR. BELSITO: No. That's what I was saying.

DR. SNYDER: I didn't think of that until you said that. I mean, I hate to give people more work.

MS. FIUME: This is the second time where I've tried to streamline. The writers are going to want to strangle me at some point because I'm like, we can give them this option, which is better. And they both went, eh. It's whatever provides the best information for you as you review it is what we want.

DR. BELSITO: Yeah. I think in this case, when you look at it, you go down to shampoos, we don't have any reported concentrations. So I mean, if it's used in higher than .01 in a shampoo, whether it's a leave-on or a rinse off, that's what we're looking at.

You know, my major concern is, and I think we need to craft some language for the discussion, simply saying that -- and this table brings it out very nicely -- that where there are reported uses and we have no information on concentration, our assumption is those reported uses aren't exceeding .01 percent. And that should go into every discussion that we write. Just like we have a botanical boilerplate, we have a respiratory boilerplate.

DR. SNYDER: Yeah, I had a note that it could say in the conclusion, you know, that as we say --

DR. BELSITO: Safe as used.

DR. SNYDER: In this instance, I feel a little uncomfortable with that because that gives a false -- somewhat of a false pretense that it's -- we have a lot of uses.

DR. BELSITO: Yeah, because we don't know what the use concentrations are in a huge number of products.

DR. SNYDER: It far exceeds what I would be comfortable with, especially in those other product categories.

DR. RETTIE: So the phrase, safe as used at maximum concentration of .01 percent --

DR. BELSITO: Yeah, we used to do that for when we had sensitization endpoints, you know, that -- we would just go with the highest endpoint that we have. And then we used to do it for irritation, but we definitely got rid of it for irritation because irritation is all going to be about how it's formulated. So you can formulate to be non-irritating. Like lactic acid is irritating, but if you put into formulation and it's a lactate salt.

DR. RETTIE: It's non-irritating.

DR. BELSITO: Yeah. So, where are we going here? They're GRAS, so we don't need systemic toxicity.

DR. RETTIE: But are you also saying that because it's GRAS you're happier with wiggle room on the method of manufacture?

DR. BELSITO: Yeah.

DR. RETTIE: Okay. That's a new one for me.

DR. BELSITO: That's sort of how we've been operating.

DR. SNYDER: Yeah, the botanicals are just unique. We're still blazing the trails so to speak.

DR. BELSITO: But I see your point, Allan, because extracting them is very different from eating a whole plant.

DR. RETTIE: Yes, sir. Concentrating lipophilic component with methyl t-butyl ether definitely were different. Just eating the plant, those things are (inaudible).

DR. BELSITO: So, what are you suggesting? I mean, we rely on you for this type of stuff.

DR. RETTIE: I prefer more information on the method of manufacture. Ask for that and then we can run it through.

DR. BELSITO: Okay. So, a little more information on manufacturing and composition of the fruit and peel ingredients.

DR. RETTIE: And we are missing any kind of composition for the peel water, although we might be able to guess what that is from the methanolic extracts of the peel water, so maybe we don't need that.

DR. BELSITO: We're going insufficient.

DR. SNYDER: We ask for whatever we want.

DR. BELSITO: We ask for whatever we want.

DR. RETTIE: Okay, MOM for the peel water as well.

DR. BELSITO: So more information on manufacturing and composition for fruit peel and peel water.

DR. RETTIE: Did you decide on ocular irritation or only if it's available?

DR. BELSITO: Yeah. We're going to hold off on systemic endpoints at this time? Okay.

DR. RETTIE: There's just a place in the text where there's a reference to constituent sanshool and shamshoolamite (phonetic). It might be samshoolamite (phonetic). I was curious why either of those didn't turn up in any of the composition tables since they seem to be the most important systemic components after oral at least. Did you see anything about that?

MS. TUCKER: I didn't see anything about that. And what I had -- I reported it as it was. So, if it wasn't reflected in that manner, that meant that's not what was available in the data.

DR. RETTIE: Okay. I was just interested in them because it seemed that they were more like the capsaicin compounds that might cause irritation. The only other note I had was that there's some LogP data that's --

MS. TUCKER: Could you repeat that? I'm sorry.

DR. RETTIE: There's some LogP data that presented in the text. As it stands, I think it's maybe a little misleading because they just cherry-picked a few of the compounds a few of the terpenes. So I don't know, maybe that could be refined.

MS. TUCKER: Refined. Okay. I noticed that. Thank you.

DR. BELSITO: What's the issue with the LogP data, Allan? I missed that. I'm sorry.

DR. RETTIE: Oh. The table divides petition coefficient ranges from 2.9 to 3.9 and from 4.2 to 4.4. But those are described that they're specifically for the aliphatic terpene constituents and the aliphatic cyclic constituents. But there's a whole range of compounds in here that there's no information for and it would be likely impossible to get it. So I rather wondered what the value was of printing the LogP, or specifying the LogP, for those particular constituents. It might be as simple as to leave it out. I don't know what to do.

I mean, it does say, I guess, clearly, that these things are going to get dermally absorbed because they're small and they've got an appropriate lipophilicity. So maybe it's just as fair to even then specify the way that you've done. That's all I have.

DR. BELSITO: And that's in which table, Allan?

DR. RETTIE: That's on Table 2. Right above it, it estimates the water solubility from a ridiculously low number to a number of two grams per liter. So that's definitely not being captured by the LogP values in the line below it. So it's just a little disconnect.

DR. BELSITO: Yeah. I see what you're saying. So let me recap where we are so far. We're going insufficient with these, despite their GRAS use, for more information on manufacturing composition for the fruit, the peel and the peel water.

At this point, we're not asking for any additional tox endpoints. We have the HRIPT at 2 percent. We're going to go formulated to be non-sensitizing anyway, so we're okay there. And that's basically our own insufficiency, that is manufacture and composition, correct?

And then in the discussion, the botanical and respiratory boilerplates, ocular irritation, if available, because it has eye uses, discussed the sensitizer so formulated to be non-sensitizing. And introduce boilerplate language to say that we're assuming that in the multiple product categories, for where we have no concentration of use, that the maximum is at 0.1 percent.

DR. SNYDER: And in that discussion, Don, if you look at Table 2 and Table 3 on page 17 --

DR. BELSITO: Yeah.

DR. SNYDER: So, Table 2 is that supercritical carbon dioxide extract of which we have nothing on.

DR. BELSITO: Right.

DR. SNYDER: And then Table 3 is of an extract not otherwise specified. So, that composition data is not on that same supercritical carbon dioxide extract -- or now down below it does say that.

DR. RETTIE: The next line.

DR. SNYDER: Oh, below. I see it now. Okay. So we have -- the data we have on is the extract we know the least about. We don't know what it's an extract of.

DR. RETTIE: The rest of the report goes to some lengths to define fruit extract and pericarp and everything, but what is the ZP extract?

DR. SNYDER: So Table 2 and Table 3, we don't know whether that's a --

DR. BELSITO: That's what I was asking.

DR. SNYDER: -- seed or a fruit or -- yeah. I just noticed that, yeah. So we may not have any properties or composition data on what's actually being used. If this doesn't represent the peel or the fruit, then we essentially have no data, other than Table 4, I guess, we got some fruit, pericarp.

DR. RETTIE: Table 1 defines -- gives definitions of structures, but it misses the definition of the ZP extract.

DR. BELSITO: And it almost looks like that could be the one that was used for the HRIPT, right, because that was a supercritical extract as well.

DR. SNYDER: Yes.

DR. BELSITO: Looking at the composition of this, I almost wonder if it's not the oil that they're looking at because it's going to be highly fragranced. If it's 30 to 50 percent linally acetate, 10 to 20 percent linalool, 5 to 10 percent limonene, those are all fragrances.

DR. SNYDER: Almost probably certainly is.

DR. BELSITO: Yes.

DR. SNYDER: Which is even less informative to us.

MS. TUCKER: It's simply identified in the NICNAS document as -- the marketing name is Pepper Sichuan Extract. The chemical name is Zanthoxylum Piperitum Extract. But that was the only information that's given. I don't think there's a clear definition anywhere of what it is.

DR. EISENMANN: But generally, CO2 extracts are very similar to the essential oils.

DR. SNYDER: Yep.

DR. BELSITO: Which we've said we're taking out of this report.

MS. FIUME: The peel oil will remain. The seed oil is not being added is what I thought.

DR. BELSITO: Yes.

MS. FIUME: The peel oil was exiting in the report, the seed oil was a possible addition.

DR. BELSITO: Okay.

DR. RETTIE: I'm sorry, you said peel oil, specifically?

DR. BELSITO: Seed oil.

DR. RETTIE: Oh, seed oil.

DR. BELSITO: Seed oil is not.

MS. FIUME: Oh, I'm sorry, the oil in general, which is obtained from the fruit and fruit pericarp, is in the report as it currently stands.

DR. BELSITO: So, Zanthoxylum piperitum oil is the oil from the fruit and pericarp.

MS. FIUME: Yes. And there is a CAS number in the NICNAS document, but all four ingredients have the same generic CAS number, including the oil. The oil and the extracts all have the same generic CAS number.

DR. RETTIE: To your point, comparing Table 3 and Table and 5, constituents, as you said, very similar from the CO2 extract to the oil itself. Heavy in linalool, linalyl acetate and limonene, in both.

MS. FIUME: So then those data may actually be on the oil and not one of the extracts?

DR. RETTIE: Might be.

MS. FIUME: Which would mean then there's no sensitization data on the extract, just possibly on the oil.

DR. BELSITO: But it says here in Table 1 that the Zanthoxylum piperitum oil is only a fragrance ingredient.

MS. FIUME: It is, but we don't have any clarification from RIFM that's it's under review.

DR. BELSITO: It's not.

MS. FIUME: So, if it's not, then we go forward with it in our documents, which is what we've been doing --

DR. BELSITO: Okay.

DR. SNYDER: We state that in the intro.

MS. FIUME: Yes.

DR. BELSITO: Okay. So then we are including the oil. Then why aren't we including the seed oil?

MS. FIUME: So it's at the panel's discretion. Right now, as it stands, the four ingredients in the report are fruit or peel. So I don't know if -- I don't know enough about it to know if the fruit -- when you're looking at the extract of the fruit, does that include the seed? But it's up to the panel if they want to include it.

It originally was not because it appeared to be a different plant part, but the panel is more than welcome to include it if you want. And what is the piece of data that we have? It was method of manufacture and composition of the seed oil. And that's on PDF Page 26.

If you decide to include the seed oil, that is data that would be added into the report. Currently, it's not in the report. I'm correct in assuming that, right, Regina? It's probably not in the report.

MS. TUCKER: No, it's not.

MS. FIUME: Do we know, is the seed oil in use in the VCRP?

DR. SNYDER: Supposedly only as a fragrance.

MS. FIUME: It's function -- I'm just wanting to see if it has a reported use in the VCRP.

DR. BELSITO: But also the oil is supposedly (inaudible).

DR. SNYDER: And we don't have any use data on it.

DR. BELSITO: Right.

DR. RETTIE: So, for the extract of the seed and the seed oil, it doesn't specify but I'm assuming that it's alcohol with water extract based on what's in the bottom of the table on PDF 26. Seed oil and alcohol and water.

DR. BELSITO: Right.

DR. RETTIE: But they're three separate ingredients or?

DR. BELSITO: No. It says it's the raw material added with alcohol/water mixture. That's how I read it. It's soaked, it's extracted, it's filtered, it's concentrated and that's what's left.

DR. RETTIE: So it's soaked in alcohol and water.

DR. BELSITO: Yeah.

DR. RETTIE: And that's the extract.

DR. BELSITO: That's how I read the table.

DR. RETTIE: That's how I read it too. So, it's a highly aqueous extract. It's not really an oil, at the end the day. It's an extract of the seed of it. It's got a very different composition from the seed oil.

DR. EISENMANN: And this is what the company has requested as a name. It doesn't mean that's what they'll get as a name.

DR. BELSITO: They're requesting?

DR. EISENMANN: That's what it looks like to me that they haven't -- it says trade name requested. So in other words, this hasn't received an official INCI name yet. And I don't know if it's in the process, I'll check with Joanne (phonetic) when we get back. So it might be called an extract, but if the INCI Committee gets to it they might call it an extract instead of an oil.

DR. RETTIE: Because there's no destination here.

DR. EISENMANN: Correct. Which would be an essential oil. Right.

DR. RETTIE: It's just an aqueous.

DR. EISENMANN: Right.

DR. BELSITO: So, the seed oil is currently not listed in the INCI dictionary?

DR. EISENMANN: Correct, as far as I know. Or is it?

MS. FIUME: I believe -- let me double-check. Because I think I just looked up the definition there.

DR. EISENMANN: It could be that this company doesn't have their name listed.

MS. FIUME: The seed oil is in the INCI dictionary. There are no reported uses in the VCRP. I think it's a brand new name based on the monograph ID, it's like, 37,000. And Carol, because this is your data -- industry -- you understand it better. With the nomenclature, does it mean that this is actually -- they're requesting it as a mixture to be submitted? Is the data actually on a mixture?

DR. EISENMANN: Yeah. The data -- they're requesting the name be the oil, alcohol and water. So if you put the material in, you have to put all three on your label.

DR. BELSITO: I am confused.

DR. RETTIE: I spent more time on this one than I did with all of the others.

MS. FIUME: The writers always are as well. I think this comes down -- well, to me, it's more clearcut with the extract when I'm looking at the data, where a lot of times the extract is one small part of botanical and a huge part of solvent. Based on this manufacturing process --

DR. SNYDER: All extracts.

MS. FIUME: -- the trade name is seed oil. But that trade name actually refers to a mixture of the seed oil, alcohol and water. Now, within that mixture is 98 percent of the seed, 1.4 percent alcohol and .7 percent water. So it's essentially a seed.

DR. RETTIE: A seed oil. Yeah. The alcohol and water is just coming along for the ride because they were residual in the final prep.

MS. FIUME: But as far as composition, it doesn't go anything -- it gives the composition of the mixture but not the composition of the botanical ingredient itself.

DR. SNYDER: Right. Right.

MS. KOWCZ: Since this the first review, can I just suggest that we will ask for everything that Dr. Belsito just asked for? And then we can get more information, as much as we can, but I wouldn't hope for too much. We can find out from the INCI Committee, they have not, obviously, looked at this because the name has not been branded. So, we'll find out whatever we can to help the panel.

MS. FIUME: But as the report goes forward, for right now, then Dr. Belsito exclude the seed oil as an ingredient and go with the four that are currently in the report until more information is received?

DR. BELSITO: Well, I mean, I think what Alex is saying is putting the seed oil in and request from the INCI committee where they're going.

MS. KOWCZ: Right. Exactly. Where they're going and what have they found. Maybe they have more information than we have right now. I mean, that's the best we can do, Monice, at this point.

MS. FIUME: But what I'm saying is the seed oil is not currently included in the report. It's been requested to be included.

MS. KOWCZ: Well, it's in your trade name requesting.

DR. EISENMANN: That's the problem, though, that the seed oil that you've got information on is probably not a seed oil, as defined in the dictionary. Because the dictionary does define it as an essential oil.

MS. KOWCZ: Yeah. And from the method of manufacture, it doesn't look like it is.

DR. EISENMANN: Right. The method of manufacture of the one we've gotten information doesn't look like that's what it is, even though that's their suggested name for it. So, you can include the seed oil, but it would not be -- you'd be making sure that the oil you're reviewing is the essential oil and not that water/alcohol extract.

DR. BELSITO: Okay. So, if we ask for seed oil, it would not really be the product that we have this method of manufacturing on that they're calling a seed oil, because it clearly is not being manufactured to produce oil?

MS. KOWCZ: Exactly. You're absolutely right.

DR. BELSITO: So, this company is asking for their product to be listed in the dictionary. We don't know how the INCI Committee will list it. So, do we even want to consider -- and they're coming to us to ask us to include this product in our consideration.

So, we can say we are not going to look at seed oil; however, we will look to see what the INCI committee calls this material. Is that fair? Is that what you're requesting, Alex?

MS. KOWCZ: Right. That's what I think would be very helpful here.

DR. SNYDER: I think what it comes down to is this review covers the fruit and the peel. We would have to then open it for the seed.

MS. KOWCZ: Yes.

DR. SNYDER: Irrespective of the INCI, right? So it would be the three components: the seed, the peel and the fruit. We have enough data on the fruit and the peel. And so, irrespective of the oil or whatever, we need data on the seed in order to consider anything related to the seed. We could say the seed is safe as used and then that whole nomenclature doesn't matter, right? Because if we get data on the seed extract, composition of the seed and -- right?

MS. FIUME: Yes. But two factors to consider are we don't have that information currently, the ingredient is not in use and you would be adding an ingredient that has no information and no use in expanding your IDA based on that.

DR. BELSITO: If we were to include seed oil?

MS. FIUME: Seed oil, yes.

DR. BELSITO: So, but what I'm hearing Alex asking for is to say we are not including seed oil. So, that is what you're saying. But we will await the INCI nomenclature committee's decision about this specific extract -- which they're calling a seed oil that doesn't appear to be a seed oil to us -- to determine whether to include it in this report.

MS. KOWCZ: If that's suitable for you and if it's acceptable to you. I think that's the best way to go.

DR. BELSITO: Yeah. Okay. So, await INCI --

DR. SNYDER: Clarification.

DR. BELSITO: -- nomenclature clarification for alcohol, water, seed extract. Is that a seed oil or not? And we're not including seed oil. Okay.

So, what I have in discussion, botanical and respiratory boilerplates. It's GRAS but we're concerned by the lack of manufacturing - or the discrepancies and what is the final outcome of extraction methods. So, we would like to know more about the method manufacturing.

It does contain sensitizers, so would be formulated to be non-sensitizing. ocular toxicity, if available. And construct some boilerplate language that we're aware that there are multiple product categories without concentration, but we're assuming max concentration as reported in this document to be 0.1 percent across all categories.

MS. KOWCZ: (Inaudible).

DR. BELSITO: Yeah.

MS. FIUME: And then Don, I wasn't sure if this was an additional consideration for a need, in that it's not clear what's being called Zanthoxylum piperitum extract in that document. Did I understand it may actually be the oil or possibly could be the oil?

DR. BELSITO: The supercritical extract, yes.

DR. RETTIE: It could be the fruit, couldn't it? It could be the whole --

MS. FIUME: It could be -- okay. So, I just didn't know if anything was needed on the fruit extract or peel as far as sensitization goes. But it sounds like what is there is acceptable.

DR. SNYDER: Well, we like that Table 1, or whatever it is, to define the supercritical carbon dioxide extract.

DR. BELSITO: Yeah.

DR. RETTIE: To define just the extract.

DR. SNYDER: Yeah, what is that?

DR. RETTIE: Because it doesn't have anything in front to extract other than the --

DR. BELSITO: But we know from NICNAS that it's not further specified.

MS. FIUME: Right.

DR. BELSITO: So, we're not going to get that information, that's the problem. So, if we're not going to get the information, do we then need sensitization and irritation? I mean, sensitization is almost like a no-brainer. It's like asking for sensitization on a hair dye, which is exempt, because we're going to say when formulated to be non-sensitizing because it has terpenes.

Given the concentration of use and what I've seen from ingredients in these so far, I'm not that concerned about irritation. Because what do we have, we have .1 percent max for the extract.

DR. SNYDER: .01.

DR. BELSITO: .01 max for the fruit extract.

DR. SNYDER: .0022.

DR. BELSITO: And .0022, right, for the peel extract.

MS. FIUME: I just wanted to make sure because it would be -- just to avoid a second IDA, I was just adding for clarification. But as long as it's all good, then that's fine.

DR. BELSITO: Just run that by me again, Monice, what the question is.

MS. FIUME: I wasn't sure if the sensitization data that were in there were now sufficient, based on some of the conversations. But it appears that they are.

DR. BELSITO: Yeah, because I mean, I think, if you look at the supercritical extract, it almost looks like it's a fragrance. I mean, that's where you'd expect the sensitizers to be coming from. And if anything, they'd be in lower concentrations in other extracts. And what was the max concentration for that peel extract, Paul?

DR. SNYDER: .01. The fruit is .01, the peel is .0022. Zero, zero, two, two.

DR. BELSITO: Thank you. Okay. Anything more on this?

DR. SNYDER: That only represents six of 180 uses.

DR. BELSITO: Yeah, I know. That's why we have this boilerplate that we're assuming the max concentration is .01 percent for the fruit extract and .0022 percent for the peel.

DR. SNYDER: So, did you get your answer regarding the frequency of use table?

MS. FIUME: Include it all. I did, I did, loud and clear.

DR. BELSITO: Yeah. I think both are very helpful.

DR. SNYDER: I second that.

DR. RETTIE: Just to clean it up, and for my own education, can we go back to the dermal irritation and sensitization?

DR. BELSITO: Sure.

DR. RETTIE: Because I have written down here that we would ask for them all except for the fruit extract. At the end of the day it's a bit of a no-brainer since we have a boilerplate that says that they are going to be formulated to be non-sensitizing.

DR. BELSITO: Right.

DR. RETTIE: I suppose that's for (inaudible)?

DR. BELSITO: Yeah. I mean, you know, it's 2 percent of the supercritical dioxide extract. And I'm looking at Table 2 where we have the composition of it. It's pretty clear that that extract is probably a fragrance, given the high level of fragrances in there. And those are really going to be your sensitizers and then you bring it down to .01 percent.

DR. RETTIE: Yeah.

DR. BELSITO: So, I think we're pretty clear there.

DR. RETTIE: Yeah.

DR. BELSITO: Okay. Let me hit the save button and clear off of this.

Cohen Team – December 5, 2022

DR. COHEN: Let's close it and move on to the *Zanthoxylum Piperitum*, or Japanese pepper. This is a draft report and it's the first time we're reviewing it. The safety assessment is for four derived products. It's used as a skin conditioning agent and -- was that right? Did I have that right? Yeah.

The fruit extract is reported to be used in 180 products and its max use is 0.01 percent in a body spray. And the peel extract at 0.01 percent and this is used in one baby product.

Not in this report is the seed oil, which has no reported uses. And the seed oil is reported to function as a fragrancing ingredient and flavoring agent. And the seed oil is a volatile oil with apparently very different composition than what we're looking at. So, we're asked whether we should include this seed oil in this report and maybe we'll tackle that question first.

I had very mixed feelings about it. If it's just functioning as a fragrance this would fall under RIFM, right?

DR. ROSS: That was my sense of it.

DR. HELDRETH: Yes.

DR. BERGFELD: But you can always mention why you're not including it. Which is the fragrance.

DR. TILTON: Yeah. If it's not under the purview of this group, it seems different enough to not include it.

DR. HELDRETH: Right. What we usually do for ingredients that are listed either as fragrance only or fragrance and flavoring agent, if there are reported uses, we will look to RIFM and ask them is this on your radar to do? Because sometimes it just may not be something they're going to look at. If they are planning to look at it or have looked at it, then, again, like you'd mentioned, we consider it outside of our purview and let them handle it.

But if there are uses and they're not interested in looking at it, then it just kind of gets falling to the wayside with nobody addressing it. Often in those cases, they'll pick the ingredient up anyway. But I don't think there's any reported uses here, so.

DR. COHEN: My concern, why I was torn on this, is we don't have method of manufacturing on the fruit extract, and the fruit extract apparently has the pericarp in it. And I can't imagine a circumstance where they're mashing the fruit up and no seeds get in.

DR. HELDRETH: Right.

DR. COHEN: Right. And we don't have method of manufacturing so I don't even know how they deseed this thing before it goes into it. So that was my torn part of it is. I can't tell you -- I mean, we know what the definitions are, we just never know -- like with olives, what's the method of manufacturing for this thing?

And if seeds ultimately get in, then we should look at the seed oil because it's going to change the toxicology of the fruit extract. So, I don't know. I'm not really sure.

DR. HELDRETH: I think the primary concern here is this is -- the seed oil is listed as a volatile oil, essentially kind of like an essential oils thing.

And the components of it are going to be very different from the rest of the extracts from the plant, and I'm not sure how well they'll relate overall even if we take the entire plant and crush it up. How much of that is going to be made up of this concentrated extract from the seed. Because even within the seed, how much of the entire seed's composition is this volatile oil? I imagine it's quite small. Probably takes many, many seeds to get a small vial of this oil.

So, I'm not sure the composition is of significant concentration to be comparable. And that's why we very often exclude essential oils or volatile oils from our reports, as long as they're not in use or somebody else is looking at it.

DR. COHEN: We're just assuming the definition and method of manufacturing are going to match?

DR. HELDRETH: Yes.

DR. COHEN: Okay. So, are we a no on this?

DR. TILTON: Yes.

DR. ROSS: A no or a yes?

DR. COHEN: Are we a no on including the oil?

DR. ROSS: Yes. I'm a no on including the oil.

DR. COHEN: Yes. We have no bananas. Tom, what do you think? I think you're on mute. Tom?

DR. SLAGA: Which ingredient?

DR. COHEN: Yeah. So, the question was do we include the seed oil in this assessment or not?

DR. BERGFELD: He needs to know the ingredient.

DR. SLAGA: This is the draft report for the Zanthoxylum?

DR. COHEN: Yes, Piperitum. Yes.

DR. SLAGA: We just have a little data on the fruit extract, the rest of them we have -- essentially, we need everything.

DR. COHEN: Hold on one second.

DR. ROSS: Can I make a comment?

DR. COHEN: Please.

DR. ROSS: I think Tom is correct in that. But I think the critical issue here is how the different extracts compare. So, you've got a lot of data here with the supercritical CO2 ZP extract. And so, how does that compare to the actual fruit extract which is GRAS and the peel extract?

There's some composition tables in the back, they all look pretty different. The Australian safety assessment was done essentially with the super critical CO2 ZP extract.

So, if their equivalent -- if that's equivalent to the fruit extract, for example, that would be the first question, then I think that we're in good shape. Because there's a lot of data with the super critical CO2 extract.

So, for example, we have dermal irritation and sensitization, David, with the super critical CO2 extract at 2 percent. Is that extract different to the fruit extract? I don't know the answer to that.

DR. COHEN: I don't know the answer, right. And we don't ha- -- we're not provided the data to answer that question.

DR. ROSS: Yeah. And I don't know if anyone in the audience can help with that description. It doesn't look that way. And I expect they'll be a lot of discussion on this tomorrow with respect to --

DR. COHEN: It's interesting. I ultimately concluded that this would possibly be safe when formulated to be non-sensitizing. It's got a lot of sensitizers in it.

DR. ROSS: Yeah.

DR. COHEN: Right. So, the fact that the patch that the HRIPT was well below max use, it seemed strange for us not to address the fact that it's got linalool and limonene in very high concentrations.

DR. ROSS: Yeah.

DR. COHEN: So, I would go ahead with -- I think we might've had enough for safe when formulated to be non-sensitizing, but I'm still hung up on how they're making the fruit extract.

DR. ROSS: Yeah.

DR. BERGFELD: Fruit or food, did you say?

DR. COHEN: Fruit. The fruit extract.

DR. ROSS: I don't think we have an HRIPT with the fruit extract. It's with the super critical CO2 extract, is it not?

DR. COHEN: Fruit extract. One second. I'm looking at the table.

DR. ROSS: Yeah, let's look at the table.

DR. COHEN: The table.

DR. TILTON: I was reading those as being synonymous, but --

DR. ROSS: I did first time through. I went back in, and I thought I wish I hadn't reopened this because this makes it really complicated.

DR. COHEN: But it says the extract. Right. It's your super critical carbon dioxide extract.

DR. ROSS: Well, I think so. Let's look at the table. Where is this table?

DR. COHEN: It's at the top.

DR. ROSS: Yeah. Genotox.

DR. COHEN: The third wave had some articles on safety.

DR. ROSS: I'm not finding it there. So, it is in the text?

DR. COHEN: This one.

DR. ROSS: Oh. That.

DR. COHEN: You see?

DR. ROSS: Yeah. Now I have.

DR. COHEN: I think I would've gone straight to safe when formulated to be non-sensitizing if I just had confirmation that it was prepared the way the definition is.

DR. ROSS: Yeah. I would've needed some indication that that CO2 -- super critical CO2 extract -- was the same.

DR. COHEN: So, what are we going to ask for?

DR. ROSS: Comparison of the fruit extract with the super critical CO2 extract.

DR. TILTON: In terms of method of manufacturing?

DR. ROSS: Composition.

DR. TILTON: Composition.

DR. COHEN: Composition. And we're okay with the method of manufacturing for -- I had, we need method of manufacturing for the fruit extract -- peel water. Do we have that?

DR. ROSS: You've got composition of impurities on the peel and you've got.

DR. COHEN: Peel extract, not peel water.

DR. ROSS: You've got peel extract.

DR. COHEN: Yeah.

MS. TUCKER: You don't have the method of manufacturing on the fruit, the peel and the peel water.

DR. ROSS: I think you have on the peel extract.

DR. COHEN: It says we have it on the peel extract. It doesn't look like we have it on the fruit extract or the peel water. And we don't have impurities on the peel water.

DR. ROSS: It looks like you've got method of manufacture on the peel water. It's whether or not you think it's sufficient enough. If you look at the text, it's at the top of --

DR. COHEN: Actually, we do have it.

DR. ROSS: -- Page 13.

MS. TUCKER: 13.

DR. ROSS: And you've got the peel extract.

DR. COHEN: I think the table needs to just be updated.

DR. ROSS: Yeah. And you just really need the fruit extract.

DR. COHEN: We need the method of manufacturing for the fruit extract?

DR. ROSS: Yeah, and you need that composition comparison with that super critical CO2 extract. The Australian document didn't address that.

DR. COHEN: Okay. So, we need method of manufacturing for the fruit extract and some comparison of the fruit extract and the super critical CO2 extract regarding composition?

DR. ROSS: Yep.

DR. COHEN: Okay. Just some scenarios now. The Belsito team comes back and similar, or they come back safe as used then we'll open up the conversation for this because I think this can go either way.

DR. ROSS: I mean, this composition discussion could go on all day, I think, because right now we just don't know.

DR. COHEN: Okay. We don't need to get wrapped around the axel on this.

DR. TILTON: I mean, I had grouped the peel extract and peel water --

DR. COHEN: Together?

DR. TILTON: -- separate from the fruit and so there's

DR. ROSS: It looks separate, yeah.

DR. TILTON: -- insufficient data there in terms of irritation and sensitization, acute toxicity. There's really no toxicity data for the peel.

DR. COHEN: Okay, wait, that's --

DR. ROSS: That was Tom's point that there's nothing on the peel. Right, Tom?

DR. HELDRETH: He's muted again.

DR. COHEN: You're muted, Tom. We're talking about the peel.

DR. SLAGA: You're talking about the peel?

DR. ROSS: Yeah.

DR. COHEN: Yeah. But, you know, am I incorrect to read that the oil and the extract, wouldn't they have the peel?

DR. BERGFELD: It says whole plant.

DR. COHEN: And it's the whole fruit, at least, right? So, I lumped them all together.

DR. SLAGA: The peel would be part of the fruit, wouldn't it?

DR. COHEN: Yeah, because the oil comes from the fruit and the pericarp.

DR. ROSS: I think it would be -- I mean, I've got a note here, we've got to decide if the peel extract is a part of the fruit extract or the super critical CO2 extract. And if it's not, then we would need to ask for all the data. But if it is, then I think you're in decent shape.

DR. COHEN: Why wouldn't we assume the peel is part of the fruit?

DR. ROSS: Well, if you look at Table 7.

DR. COHEN: Table 7.

DR. ROSS: You've got -- and I hate to get into the weeds here, because I mean, it's -- again, as I said, we could go on all day with this but if you look at composition data on the peel extract and look at those major constituents, it's mainly limonene and phellandrene.

DR. COHEN: Right. And a lot of it.

DR. ROSS: Yeah. And then you go back, for example, I think it's Table 3. Yeah, and there's the composition data on the ZP extracts -- Zanthoxylum Piperitum extract -- and that's going to be the CO2 extract. And that is fair amount of limonene but quite different. So, when you look, the peel extract and the -- if you compare Tables 3 and 7 they do look different.

DR. COHEN: The thing is, would these be different enough if we were just looking at two cultivars of the same -- you know what I mean, of the same fruit? What is shockingly different here? I see what you mean. I guess table --

DR. HELDRETH: So, if we're looking at these constituents of concern in the compositions, and we see the linally acetate of 50 percent in Table 3 and then -- I forget --

DR. COHEN: Table 7.

DR. ROSS: Limonene.

DR. HELDRETH: Table 7 was -- limonene was --

DR. COHEN: 44 percent.

DR. HELDRETH: 44 percent. Are those still concerning when the max use concentration is 0.01 percent?

DR. COHEN: No, and we might advocate for a formulate to not be sensitizing.

DR. HELDRETH: Right.

DR. COHEN: That's why I wasn't so concerned about those differences.

DR. HELDRETH: Right.

DR. COHEN: But the point is procedural that they're different. All right, so why --

DR. BERGFELD: We could discuss it in the discussion.

DR. COHEN: Why don't we close it at -- wait, but actually, Susan, I don't think I addressed -- no, no, we did. This was the issue with the peel. This is the peel. So, we're making some assumptions that the peel is part of the fruit. That's how I did it, but we --

DR. SLAGA: It has to be from the fruit. It's a good assumption.

DR. COHEN: I'm just looking. Yeah. The oil comes from the fruit and the fruit pericarp. But we don't know what the extract is.

DR. ROSS: I think the problem is, you've got that CO2 extract for the dermal sensitization, right, which is at 2 percent, which is great.

DR. COHEN: Yes.

DR. ROSS: But you have nothing on the actual fruit extract. So, if they're equivalent then you don't have to worry about --

DR. COHEN: I was thinking that that super critical was the fruit extract.

DR. ROSS: I was, too, initially but.

DR. COHEN: And it changed your mind because of the constituents?

DR. ROSS: Well, there's no definition in here that one is equivalent to the other. In fact, there's some comments in there that they may be different. I think that was in the preamble from the staff.

MS. TUCKER: That's correct because there was -- with what NICNAS provided, we don't exactly know what the extract was referring to.

DR. ROSS: Yeah, I agree with you. I went back to that study and it did not.

MS. TUCKER: Yeah, it doesn't say. So, we just know it's an extract. We don't know whether or not it is the peel extract or the fruit extract.

DR. ROSS: Yep.

MS. TUCKER: It's not defined.

DR. ROSS: So, if you knew that the fruit extract was equivalent to that CO2 extract, dermal irritation and sensitization is taken care of.

DR. BERGFELD: Can you go back to the unpublished data and check with the provider? Ask the question?

DR. HELDRETH: Well, it came from the NICNAS document. And Regina has gleaned through it and it's not there -- that

information. So, we would have to get back to the submitter that sent it to NICNAS, and I'm not sure we can follow that trail all the way back.

DR. COHEN: So, what are we really worried about?

DR. ROSS: Composition of the two extracts.

DR. BERGFELD: Sensitization.

DR. COHEN: Right. But we know there are sensitizers in here. So, whether there's different levels of these sensitizers in there, okay, we'll accept that, that there's a lot of them in there. We have very low max use, right. And we will -- we might -- I don't know what the Belsito team will submit. But if we put it not be sensitizing, what haven't we covered by that? What's the worst scenario?

If we have very low concentration max use, we know there are known sensitizers in there, we're going to caveat with a finding. What do you anticipate we will find that could create a problem?

DR. ROSS: I'm not sure how anyone formulates it to be non-sensitizing if they don't know what's in it.

DR. COHEN: Well, they'll do --

DR. ROSS: Do the actual test.

DR. COHEN: Yeah, they do the test.

DR. HELDRETH: So, with botanicals when we have a non-sensitizing caveat, the idea is that with the ingredient by itself, at the maximum use concentration in a formulation, does not induce or elicit a sensitization response. But that potentially, multiple ingredients with the same constituents of concern added to a single formulation, might exceed a threshold to cause sensitization, either induction or elicitation.

And that's what the formulated to be non-sensitizing means. It means avoid that aggregate buildup of concentration sensitizers in your formulation.

DR. COHEN: Bart, that's predicated on non-botanical, right?

DR. HELDRETH: That's just for botanicals.

DR. BERGFELD: No --

DR. COHEN: Just for botanicals?

DR. ROSS: So, could we go that way?

DR. BERGFELD: That's what David's proposing.

DR. COHEN: Yeah. That we cleared this, or get close to clear it, and ask for method of manufacturing and ask for some clarification on the super critical versus the fruit extract. But I'd like to hear -- I'm open to clearing it.

DR. ROSS: Yeah.

DR. COHEN: Tom, what was your -- before the conversation, what was your conclusion on it?

DR. SLAGA: Well, I had that we had sufficient data with the fruit extract, which would include the peel and the peel water. And the only thing that I wasn't quite sure, but I thought we reviewed it before, is the oil. But I may be wrong.

I didn't think we need method of manufacturing. I basically would go that it's used in such small amounts that it would be safe as used. The ingredients.

DR. COHEN: Okay.

DR. SLAGA: I mean, that's what I had initially now, and I've heard all of the additional. I wasn't sure absolutely about the sensitization, but in some cases we formulated to be non-sensitizing and -- if there is an issue there.

DR. COHEN: So, Bart, industry gets formulated to be non-sensitizing. From an operational standpoint, they're going to formulate this with their best guess of levels of sensitizers. And then they're going to do an HRIPT on the product? They don't have -- I'm just say- --

DR. HELDRETH: I mean, I can't speak for industry, industry can speak up on that. They have at their disposal, they could do an HRIPT, guinea pig maximization test. Use some of these new alternative approach methods. Use the QRT 2.0 way to clear it. There's numerous ways they could mitigate any risk of sensitization there.

But if this is the only ingredient that they're putting in their formulation, that has any potential sensitizers, they're already going to be in good shape without doing any testing.

DR. BERGFELD: Well, you could always put in your discussion of the back to the mixed -- any mixtures might add to the --

DR. HELDRETH: Well, that's why we have the caveat, the non-sensitizing.

DR. COHEN: Yeah, and that was the issue. The seed oil, if it's fragrance, it probably has high concentrations. So, the very same chemicals, they're next-door neighbors in the fruit so -- okay. I think we know what to do from here, right?

DR. ROSS: We do?

DR. COHEN: I do. I think we're going to either be presented with a safe as used, safe as used to not be sensitizing, or an IDA with probably very similar things than what we have. I don't think there's going to be an infinite number of -- but we'll see. But I think we're very comfortable with the data ambiguities we have right now, and we'll talk them through.

DR. ROSS: I think that's a good segue.

DR. SLAGA: Right.

DR. COHEN: Okay.

DR. BJERKE: Dr. Cohen, one thing to consider, too, is the way, like in Europe, they approach limonene and linalool and some of these constituents for labeling. So, for a rinse off, if it's less than 100 parts per million it doesn't need to be on the label. For a leave on, if it's less than ten parts per million it doesn't need to be on the label. So, when you're talking about low concentrations that's another consideration that you can think about.

DR. COHEN: So, this, if it's at -- I've got to go --

DR. BJERKE: So, 0.01 percent would be a hundred parts per million.

DR. COHEN: A hundred parts per million and for leave on it'd be --

DR. BJERKE: It'd be ten.

DR. COHEN: So, this could be 40 parts per million based on the constituents for linalool/limonene, 40 or 50 parts per million. So, it's a legit caveat in the conclusion.

DR. BERGFELD: On the discussion.

DR. COHEN: Both, right?

DR. HELDRETH: Both.

DR. COHEN: Yeah. That's helpful. Okay.

DR. ROSS: Yeah, thank you.

DR. COHEN: That's very helpful. All right. We have a lot of dodecyl's to talk about here.

Full Panel – December 6, 2022

DR. COHEN: Zanthoxylum piperitum, this is a draft report and it's the first time we're reviewing this. The safety assessment has four ingredients and it's used as a skin conditioning agent. The Fruit Extract is reported to be used in 180 products. And we have max use of 0.01 percent in a body spray and hand product. We have the Peel Extract at 0.01 percent in a body and hand product as well.

As for the Piperitum Seed Oil, there were no reported uses in the VCRP, we don't know the concentration, and it's reported to function as a fragrance and flavoring agent. And there was a presumption that the Seed Oil is a volatile oil likely to be different in composition than some of the other ingredients. We went back and forth on whether to include this in our report and we elected not to, but we'd like to discuss that further.

We have a fairly good portfolio on these items. The extract is GRAS. We have HRIPT at 2 percent. And, so our motion is in consideration for future possible safe as used when formulated to be non-sensitizing. Our present motion is an insufficient data announcement with needs of method of manufacturing for the Fruit Extract and Peel Water, and impurities on the Peel Water.

DR. BERGFELD: And that's your motion?

DR. COHEN: That's our motion.

DR. BERGFELD: Is there a second or discussion?

DR. BELSITO: We had method of manufacturing more information, for just Fruit Peel and Peel Water.

DR. COHEN: Fruit Peel, hold on a second.

DR. BERGFELD: Are you agreeing to the insufficiency, though?

DR. BELSITO: Yes, it's insufficient.

DR. BERGFELD: Okay.

DR. BELSITO: We also agreed not to do the Seed Oil, but there was information on a product that was called Seed Oil that was actually an alcohol water seed extract that's awaiting nomenclature from the INCI committee. That may or may not be able to be included in this report.

DR. COHEN: So, Don, why did we go back and forth? The fruits are very small apparently.

DR. BELSITO: Um-hmm.

DR. COHEN: And, it was unclear, since the oil, as obtained from the fruit and the pericarp, you know, how efficient is the extraction of the seed in this thing. And will we have any Seed Oil in there. But we went under the assumption that we'll get method of manufacturing for the extract. That's the most used item. And we don't clearly have method of manufacturing, even though we have the definition of what the Fruit Extract is.

I found like when we'll review some other ones, what the definitions are and how the methods of manufacturing play out, don't always come together in parallel. So, before drawing any conclusions on what we think the Fruit Extract is, we'd like actually method of manufacturing on the Fruit Extract.

DR. BELSITO: I mean, that's fine, we're going insufficient.

DR. COHEN: Yeah.

DR. BELSITO: But you don't want manufacturing on the Fruit Peel; you said Fruit Extract and Fruit Water.

DR. SNYDER: Peel water.

DR. BELSITO: Peel water.

DR. COHEN: We have method of manufacturing on Peel Extract and Peel Water, right?

MS. TUCKER: Not peel water.

DR. COHEN: No? Peel Water is an aqueous solution of the steam distillate of the peel. Let's just make sure we're -- so we had method of manufacturing for Fruit Extract and Peel Water, and impurities on the Peel Water.

DR. BELSITO: Okay. I mean, I see what you're going at, the Peel Extract there. Okay.

DR. COHEN: Is that --

DR. BERGFELD: So, you've both agreed it's insufficient.

DR. BELSITO: Yeah.

DR. BERGFELD: Now you've agreed on the needs, is that correct?

DR. BELSITO: Yeah. It's fine.

DR. ROSS: Could I just ask?

DR. BERGFELD: Sure, David.

DR. ROSS: Did your team have any discussion on the equivalence of Zanthoxylum piperitum liquids CO2 extract versus the Fruit Extract?

DR. BELSITO: We thought that CO2 extract was likely a fragrance, based upon the composition.

DR. ROSS: Yeah. So we talked quite a bit about the fact that the dermal and sensitization data was done with the CO2 extract. And we were trying to equate that to the Fruit Extract. But maybe the method of manufacture of the Fruit Extract would inform us about how to perceive that.

DR. BELSITO: But I think the sensitizing component of that extraction, the CO2, looking at the ingredients that were present, that would be much more sensitizing than anything else coming out of the fruit, you know, very high concentrations of tropines.

DR. RETTIE: Dave, are you referring to the fruit pericarp ethyl acetate extract?

DR. ROSS: No, I think the CO2 extract was used for the dermal and sensitization data and some of the genotox data.

DR. RETTIE: Yeah. So, what was the other one that you were --

DR. ROSS: Just the Fruit Extract itself. So we were trying to equate those two, you know, there was no details. The Australian safety assessment used the CO2 extract.

DR. BELSITO: The NICNAS, yes.

DR. ROSS: Yeah.

DR. RETTIE: So we don't know what the Fruit Extract is?

DR. ROSS: Exactly.

DR. COHEN: That's why we want method of manufacture.

DR. BELSITO: That's fine.

DR. COHEN: We're not sure what we're looking at. And then, the oil has a lot of fragrance sensitizers.

DR. RETTIE: It does.

DR. COHEN: So, even though we saw the HRIPT at 2 percent was negative, we were still polarizing to formulate to not be sensitizing.

DR. BELSITO: You'd have to do it.

DR. COHEN: Yeah, well, we would agree on that. We'll just get the further data and finish this.

DR. BELSITO: Yeah, fine.

DR. RETTIE: Yes.

DR. BERGFELD: So, may I call the question then? All those in favor of an insufficient data report? Unanimous again. And the needs -- are we clear on what is needed?

MS. TUCKER: Yes, the method of manufacture for the -- are we asking for the Fruit Extract and the Peel Water, and impurities on the Peel Water?

DR. COHEN: Exactly, yeah.

MS. TUCKER: Okay, thank you. All are noted.

DR. BERGFELD: Thank you.

DR. BELSITO: And, this would actually be a good document to discuss the Use Tables. We really didn't go back and forth on this. We thought that both tables were very helpful. The old line tables were helping us to quickly set where we wanted to look for upper limits and lower limits. And the other tables to point out the number of product categories that exist where we're not getting reported concentrations.

With that in mind, however, our conclusions are always safe as used as described in the safety assessment. So, if we're getting only one concentration on one product line, that means that that concentration is the upper limit for everything else that hasn't been reported. So, we liked seeing both of them. We thought that was helpful.

DR. BERGFELD: I think there was some question about the Journal taking two such tables. Monice, did you ever resolve that, or Bart?

MS. FIUME: I don't think we discussed it with the Journal. I think if it was okay with the Panel, we could probably work on the format of the table a bit so that it may all be able to be placed on one table. Or, somehow consolidate it so that it gives you all the information you want. So I'd like to work on that.

DR. BERGFELD: Okay.

DR. RETTIE: Seems like a consolidation was a good way to go because only a small amount of information really needed to be transferred into the enlarged tables to give us everything.

DR. BERGFELD: David Cohen?

DR. COHEN: Yeah, on the team we had a very broad standard deviation of opinions, so even though our mean and median opinion would be the same as yours. There are some that liked the new tables, some liked the old tables, some liked both tables. And it didn't completely depend on which report we looked at, but it was maybe slight variation there. So, if we can have both tables that would be great.

I feel, Don, what you mentioned that the report kind of anchors on the max use of the only thing we have. It's come up more times recently than it has in the past. And, it has created some issues for us if we know products were being used on the lips, or on the eyes, and we have max use of a body lotion. And we're using that data and it may not so easily carry over.

DR. BERGFELD: Well, it seems that there's a unanimous agreement that it will have both tables in every document, and good luck consolidating them.

MS. FIUME: Thank you.

JUNE 2023 PANEL MEETING -TENTATIVE REPORT

Belsito Team-June 12, 2023

DR. BELSITO: Okay. Then, *Zanthoxylum Piperitum*. And again, we've got a Wave 3 on this. I think it was -- **DR. SNYDER:** Correct.

DR. BELSITO: I just have a note, we need to address comments in Wave 3. So, let's look at that first.

DR. SNYDER: Page 9.

DR. BELSITO: Pardon?

DR. SNYDER: Page 9 of Wave 3.

DR. BELSITO: Okay. Okay. So, there's essential oils and water so we'll update that, Regina?

MS. TUCKER: Yes.

DR. BELSITO: Okay. Composition and impurities, that's just editorial. Okay, and then calls it an oil, right so it's *Zanthoxylum Piperitum* oil, not fruit extract, because when you view Summary. Maximum use concentration, 0.0022. So, what was that, it was a correction to the original report, right? Yeah, so we need to clarify about the hydroxy-alpha-sanshool had the highest plasma concentration. Whether this was compared to other components of *Zanthoxylum* or to components of other plants included in the mixture. Do we know that?

MS. TUCKER: No, I don't know that. I do need to look back at that to see which didn't have the highest concentration.

DR. BELSITO: Okay.

MS. TUCKER: And as for the last part about how did the authors determine --

DR. BELSITO: Apoptosis.

MS. TUCKER: Right. So, from what I saw it appeared that they were referencing other studies to come to that conclusion. But I also wanted to look back just to be sure of that. But as I read it, it looked like they kept going back to the work of other authors to affirm that it was apoptosis.

DR. BELSITO: Okay. So, at the December 2022 meeting, this was insufficient. We wanted method of manufacturing, composition of the fruit extract and the peel water. Impurities data for the peel water and more concentration of use data. Just to comment, looking at this concentration of use data, it almost looks to me like either the VCRP has screwed up in their reporting or companies have screwed up in ours. Because the fruit extract, which has the greatest number of uses, has one reported category of use. And the peel water, which doesn't have a lot of uses, has multiple categories where concentrations of use are listed. So, that makes no sense based upon different --

MS. EISENMANN: Different companies are reporting to the VCRP versus the companies that are reporting to me.

DR. BELSITO: I understand. It just, to me ---

MS. EISENMANN: I think it's going to be more of a problem as we go mandatory.

DR. BELSITO: It just suggests that either the VCRP has incorrect data on what is being -- whether it's the extract or peel water being used or companies --

MS. EISENMANN: Even 183 uses is not that many. I mean, it could be some company -- or a couple of companies that use it in a lot of products reporting. And I don't send them surveys. I mean, I only send the survey to our members, really.

I mean, if somebody contacted me and said, yeah, I want to participate in your survey, I'd be happy to have them participate. But I haven't been able to necessarily get more companies to respond --

DR. BELSITO: Okay.

MS. EISENMANN: -- other than our members.

DR. BELSITO: I understand your dilemma. I'm just looking at all of the reported concentrations we have for this peel water, and it's used in a small number of products.

MS. EISENMANN: I agree. And I'm getting a few ingredients that get on the priority list because of number of uses. And then I send out a survey and get no uses.

DR. BELSITO: Right. Which brings up this other question and I can't remember. This was an exhausting meeting to get ready for. Bart said something about with MoCRA the FDA is going to stop --

MS. KOWCZ: They have stopped. The VCRP has been stopped.

DR. BELSITO: Isn't MoCRA obligatory?

MS. EISENMANN: It will be.

MS. FIUME: Oh, yeah, it will be.

DR. BELSITO: So, don't we -- won't we be getting even better data?

MS. EISENMANN: Hopefully, but again, MoCRA is not going to be collecting concentration of use information. So it's going to, again, rely on the survey. So, there's going to be a disconnect.

DR. BELSITO: Well, you're going to the survey but we're going to get better data on product use.

MS. EISENMANN: Correct.

DR. BELSITO: Right. Because the way it was phrased was almost like, oh, we're going to lose this data. In fact, we will get better data.

MS. KOWCZ: Well, we've lost the data. The data was not transferred. Whatever data was in the VCRP right now was not transferred. It's just a decision that was made. It's not transferred at all. So, all this data that was done before --

DR. BELSITO: So, we won't know --

MS. KOWCZ: -- we will not. Now it's going to start anew and the product listings are due by December 29, 2023, this year. **DR. BELSITO:** Right.

MS. KOWCZ: And that's -- you're starting from scratch. That's how we look at it as industry.

DR. BELSITO: But tell me why you think you're starting from scratch? You won't know if the product use has increased or decreased, is that what you mean?

MS. KOWCZ: No, I mean, that the data that has been put in for the products -- because don't forget a lot of products still exist. **DR. BELSITO:** Right.

MS. KOWCZ: Okay. So, now you're going to have populate the new system all over again. So, for the company that's a big task to do that all over again because they really thought that all the data would be migrated to the new system. It was not. So, a lot of people that put in trying to be the really good citizens, trying to get it in before the deadline, that data was not transferred. It was a decision by the FDA that they're not going to transfer it. So now, one of the companies will have to, again, populate the system, whatever that system will be. So, I'm just saying, Don, that the information that we had for many years is not going to be there. We're starting with the new products, the new information, all of the products that are out of the market, that will be a definite, definite regulation. You have to. It's not a nice to have like the voluntary was, many people did not do the voluntary. Many companies did not. But now everyone will have to.

DR. BELSITO: Right.

MS. KOWCZ: So, yeah, whatever the new system will be, Don, we should have better information. But as Carol said, we will not have concentration of use. We'll still have to do the surveys.

DR. BELSITO: Right. Yeah. I understand that. But it almost was like -- the way it was worded, when I read it, it sounded to me like we weren't going to get number of uses. And my understanding of MoCRA was that we will get even better numbers.

MS. EISENMANN: I wouldn't expect -- you know, we've been getting the data pull at the beginning of the year. I don't expect to have that -- it's highly unlikely that's going to happen next year. It's probably going to be at least a year or so back. **DR. BELSITO:** Okay. Okay. Let's skip back to *Zanthoxylum*. In response to your questions, Regina, about the additional references in that paper I sent you, I don't think we need to look at the first one, the herb, because that's leaves and we're not looking at leaves. The second one on the Korean medicinal plant, I think we'd need to know what part of the plant they were looking at.

MS. TUCKER: Who was the author?

DR. BELSITO: Cho.

MS. TUCKER: It's on the leaf, the root and fructose and stem. And the fructose and stem were combined together in the compound info was on the leaf. So, it seemed like although it stated it was the fructose and stem, it seemed like from the chart they put the stem and -- I'm sorry. Yes, that they put stem and the fruit together to get the compounded information in that article. So, it was combined. I don't know how useful that would be for the panel because we just would want the information on the fruit. **DR. BELSITO:** Right. The fruit and the peel.

MS. TUCKER: Yes.

DR. BELSITO: Okay. The quercetin one, no. The essential oil, I mean, we're looking at that and this looks like it would have data for genotox, so.

MS. TUCKER: So, with that particular article, it was derived from the leaf. Did that make a difference?

DR. BELSITO: I don't know. I wouldn't think the oil from the leaf would necessarily differ, but I don't know.

DR. RETTIE: The composition data here in this is all very difficult to get your head around.

DR. BELSITO: Yeah. We don't --

DR. RETTIE: Each table we look at for the different parts of the botanical and the extract and solvent gives us cornucopia of different products.

DR. BELSITO: Did they discuss what the composition of that leaf oil looked like?

MS. TUCKER: That, I'm not sure, I would have to look. But I know that the article, it was --

DR. BELSITO: I mean, I think if the composition of a leaf oil is similar to what we're told the composition of the plant oil is,

then we could use some of that data since we have no genotox data.

MS. FIUME: The fruit oil?

DR. BELSITO: Yeah. The Gwon paper I don't think would help us. The Li paper on the water extract, do we know what part of the plant that's from?

MS TUCKER: Leaf.

DR. BELSITO: From the leaf again?

MS. TUCKER: Mm-hmm.

DR. BELSITO: Okay. No. And what about the Sunohara (phonetic) paper?

MS. TUCKER: That one was on the effect of seedling growth from lettuce, and it combined the leaf and the fruit combined together.

DR. BELSITO: Okay. So, we wouldn't know much of that. Okay. So, I think it would just be the mutagenicity one if the leaf oil seemed similar if we know anything about the composition from that paper. Just did some editing here. Let me see. So, in terms of in your draft report, the draft abstract, the potential sensitizers after reading through this paper, linalool and limonene are really -- if they're not oxidized aren't sensitizers. They are on the European list of 26, but it's the hydroperoxides, if they are formed in product, it could be an issue.But reading through the composition here, I think the two that you'd probably want to point out, that have RIFM standards that are clear sensitizers, are citronellol and geranyl acetate; which were in high concentrations as well, just as examples because there's no standard for linalool or limonene. I mean, it's really, they're not sensitizers unless they're oxidized. Or you could just put, for example, the multiple terpenes because there are a lot of terpenes in there that are issues. The pinenes are issues, the cineoles are issues. There are multiple sensitizers that came out. You could just put, for example, the terpene content or something like that rather than naming a specific fragrance material. The dictionary definition of the peel water that appeared again under manufacturing shouldn't be there.

MS. TUCKER: Could you tell me --

DR. BELSITO: Yep. PDF Page 33.

MS. TUCKER: Thank you.

DR. BELSITO: Right above composition and impurities. We sometimes use manufacturing or dictionary definition to try and understand the manufacturing, but it shouldn't go under method of manufacturing.

MS. FIUME: So, I have a question, Don, because we've done this on numerous reports. So none of the reports you don't want to see the dictionary definition as --

DR. BELSITO: Oh, the dictionary definition, but it's already there. It's usually in a separate section, right? It's in the table.

MS. FIUME: It is. But when we don't have it -- when we don't have data on method of manufacture for an ingredient, we'll say in some cases the definition in the dictionary may provide insight as to the method of manufacture.

DR. BELSITO: But we've done that in Discussion, not put the dictionary definition under method of manufacture, have we?

MS. FIUME: We've done it in a lot of the reports.

DR. BELSITO: Really?

MS. FIUME: Botanicals under method of manufacture.

DR. BELSITO: I don't think it should be there. I mean, it's not a method of manufacture, it's a dictionary definition. I think we can put in the Discussion that --

DR. SNYDER: -- in the absence of --

MS. EISENMANN: But in this case it is a method of manufacture for the definition, for water. So that's probably one of the rare ones that there isn't information, that it just the water fraction, the steam distill---- I don't know the exact wording, but ---

DR. BELSITO: Yeah, it's the aqueous solution of the steam distillation obtained from the peel of --

MS. EISENMANN: Right. Most of the definitions don't have enough information to be useful, but that one is more specific than any of the definitions. For that one, I think --

DR. SNYDER: Just put it in there and reference. You don't need to say it came from the dictionary. Just reference it. Just put that statement in there and reference it.

DR. BELSITO: Okay. From the source.

MS. FIUME: But it will be a one-line sentence.

DR. BELSITO: Right. So, according to the dictionary -- so get rid of that. Just say *Zanthoxylum*, is what you're suggesting. I'm happier with that.

DR. SNYDER: Yeah.

MS. FIUME: So, I do have a question to go further based on what Carol had said. So, for under the oil, it tells you what parts of the fruit it's obtained from and that's the only part of the manufacture that's under there. So, it doesn't say the process. Would you like to see that under method of manufacture, so you know what parts of the fruit is being manufactured from, or do you want to rely on the definition in the table itself for it? Because although it's not processed it's telling you where it's common -- **DR. SNYDER:** What component is used.

MS. FIUME: -- because sometimes when it's oil it's of the whole plant, or when it's extract it's the whole plant or sometimes it refers to a specific part of the plant, but it's still generic made extract. So, for the writers guidance, do you want to see that under method of manufacture or no?

DR. BELSITO: Yeah.

DR. SNYDER: It's derived from the blank of a plant.

DR. BELSITO: But the part of the plant it's derived from, Monice is saying, comes from the dictionary definition.

MS. FIUME: Right.

DR. BELSITO: So, it's a mixture of what we got about manufacturing, plus what we know -- what part of the plant is being manufactured that way. So, do we want that hybrid? And, yeah, I would like it.

MS. FIUME: So, under *Zanthoxylum Piperitum* oil, just in that second sentence remove, "according to the dictionary," and just leave it that the oil is obtained from the fruit and fruit pericarp?

DR. BELSITO: Yeah.

MS. FIUME: Okay.

DR. BELSITO: Because that's the dictionary definition and that's our basis for looking at the oil. It's going to be derived via this mechanism from this specific part of the plant.

DR. SNYDER: Strictly, I like defining specifically what it's derived from in these reports so that --

DR. BELSITO: Right. Because we say as used and people can go back and see that the manufacturing is this and this is the part of the plant they should be using in the manufacturing.

DR. SNYDER: Yeah.

MS. FIUME: And then, just for one more point of clarity as we prepare our reports. So, generally somewhere when we are using the definitions, because we have nothing else, we'll say in some cases the definitions of the ingredients as given in the dictionary

provides insight as to the method off manufacture. Do you want that statement somewhere under the method of manufacture section or just stated as you had said earlier.

DR. SNYDER: Just reference it.

DR. BELSITO: Stated.

MS. FIUME: Okay.

DR. SNYDER: Just state it and reference it.

DR. BELSITO: Yeah.

MS. FIUME: Okay.

DR. SNYDER: And reference the dictionary just like we do.

DR. BELSITO: So, Regina, another question I had is on PDF Page 34, where you're talking about the *Piperitum* oil, and you go on to say -- where am I here?

MS. TUCKER: Page 34. Another study?

DR. BELSITO: Why isn't it popping up? It has to do with the tocopherols, and it looks like they were just looking at tocopherol. And so, it was sort of misleading to say that alpha tocopherol was the major constituent. But why am I not seeing this now? **MS. FIUME:** Is it at the very top of Page 33, the very last sentence of the first paragraph which is an incomplete paragraph?

DR. BELSITO: I may have tagged it on to the wrong place. It's not popping up here. It just had to do with --

MS. TUCKER: I think you're right. The composition data on the abstract from the dry pericarp and seed are also provided in Table 5, where it's shown that tocopherol had the highest composition.

DR. BELSITO: Yeah. That's the one. I just tagged it to the wrong one. So where is that, Monice? It's page 33?

MS. FIUME: Page 34, it's the first complete sentence on that page right after Table 4. Where it says summarized in Table 4. **MS. TUCKER:** Right above, "In another study ---"

DR. BELSITO: Yep. Yeah. Yeah, that's it. Okay. Yeah, so if you look at the table, they were just looking at tocopherols. So, I think it's not that alpha tocopherol had the highest composition of the dried pericarp. Because I don't see that it was looking at other components of the pericarp, it was just looking at different tocopherols.

MS. FIUME: So, they're only looking at tocopherols, we can delete that study?

DR. BELSITO: Yeah. I mean, I don't think it adds anything, right? Or the table. If you look at the table, it's what? I mean, you could say that the peel contains tocopherol, I guess. So, it looks like the peel also has -- this is PDF page 35. It says, "According to another source fruit peel and leaves have been used in Japan for centuries as spices to preserve food." So, does this food use alleviate our concerns for lack of composition and impurities is my question? Because typically, if we've had a food use then we just looked at sensitization and irritation data. Right?

DR. RETTIE: I mean, it's not just Japan.

DR. BELSITO: No, Korea.

DR. RETTIE: Korea. Lots of Asian countries have been using this for centuries.

DR. SNYDER: But we're using that to alleviate all the tox data, right?

DR. BELSITO: Right. I mean, you're comfortable? I'm asking, right?

DR. SNYDER: Yep. Yep. I think that's fine.

DR. KLAASSEN: However, the dose that you use as a spice is pretty low, usually.

DR. BELSITO: But what's the dose you're using here, Curt? Look at the levels. They're like 0.000, right?

DR. SNYDER: Yeah. Yeah.

DR. KLAASSEN: Yeah.

DR. SNYDER: Yep.

DR. KLAASSEN: I think it's probably all right.

DR. BELSITO: I mean, I think if you got to levels that would be spice, you'd be dealing with something like capsaicin, and it would burn when you put it on your skin. But that's my own assumption.

DR. RETTIE: I formed the impression that spice component was the alpha/beta/gamma and it goes and goes (inaudible) receptors. So, I assume that those were the pungent parts of it. When you look at the composition, those are very low relative to other things.

DR. BELSITO: I thought -- my final conclusion after going all through this, and there's also a lot of wordsmithing that we don't need to go through, is safe as used when formulated to be non-sensitizing.

DR. SNYDER: Perfect. Perfect. That's what I have.

DR. BELSITO: And the tox data is assumed based upon the food use -- the centuries of food use -- among Asian countries as well as other countries.

DR. SNYDER: Agreed.

DR. BELSITO: And low concentration of use. I mean, we're talking about what? Point --

DR SNYDER: 0.0022 percent.

DR. BELSITO: Right.

MS. FIUME: So, do you want that in the Discussion or the 0.1, instead of saying low concentrations? You said that you don't want low concentrations --

DR. SNYDER: No, yeah, specify, yeah.

DR. BELSITO: No.

MS. FIUME: It's the 0.01, right, the highest --

DR. SNYDER: Use the maximum concen- --

DR. BELSITO: Highest leave on -- yeah.

DR. SNYDER: The highest leave on concentration. Yeah.

MS. FIUME: So, is that the 0.01?

DR. SNYDER: Is it?

MS. FIUME: So, the ingredient with the most uses has --

DR. BELSITO: Yeah, the one for the fruit is 0.01. For the peel water is where it goes down to times ten to the minus four.

DR. SNYDER: Oh, yeah. For sprays and hand products. Yep. 0.01. My bad. Yep, yep.

MS. FIUME: So, use that rather than low concentrations?

DR. SNYDER: Yes.

MS. FIUME: Okay.

DR. BELSITO: Okay.

DR. KLAASSEN: Be specific.

DR. SNYDER: I mean, the only other way to do that would be we would have to have in our resource document what we considered low, extremely low. You know what I'm saying?

DR. BELSITO: No, I don't want to get into that.

DR. SNYDER: I know. I mean, 0.01 percent.

DR. BELSITO: Yeah.

MS. FIUME: When non-sensitizing or irritating?

DR. SNYDER: Non-sensitizing.

DR. BELSITO: Non-sensitizing.

MS. FIUME: Non-sensitizing. Got it.

DR. SNYDER: Got that -- those two sensitizers.

MS. FIUME: Wrote it down wrong.

DR. BELSITO: It's got multiple sensitizers.

DR. SNYDER: Two biggies.

DR. BELSITO: Potential. Okay. Are we done with this?

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DR. COHEN: Let's move on to Zanthoxylum Piperitum. So, we have a draft tentative report. In December, we issued an Insufficient Data Announcement for four of the derived ingredients. We asked for a method of manufacturing and composition for the fruit extract, which I think we received.

DR. ROSS: Yep. We got it.

DR. COHEN: The peel water, which I don't think we obtained but we have lots of information about the fruit, which has the peel. Impurities data for the peel water. Further concentration of use data if available. And we received the peel extract at 0.0022.

And we got some 2023, VCRP. And we understand that the fruit has many potential sensitizers. I think I have a note here that the peel of the fruit is extracted with purified water. Through several methods, alcohol, water extraction.

DR. ROSS: It is. Yeah.

DR. COHEN: So I think the peel constituents are okay for clearing the fruit. Before I divulge my conclusion, what are your thoughts? Let me make sure we got Tom on this. Tom, we're on Japanese and Sichuan pepper. What do you got?

DR. SLAGA: This is GRAS and used in some Japanese foods. And it's not an irritant nor is it genotoxic. So, overall, other than sensitization in it, I don't know if we need anything else.

DR. COHEN: David?

DR. ROSS: I'm still at the same place I was when I first read this, even with the data -- well, a little bit further forward with the data that came in. But, you know, if you look at these extracts, they're all different in their constituents, if you go through the tables. Most of the data we have in this document, I believe, is from that Australian NICNAS study. And that uses a supercritical CO2 extract. The fruit extract we're dealing with is extracted with 50 percent ethanol, which we did get. That was something we requested. And so, if you compare the supercritical CO2 extract with the 50 percent ethanol extract, with the peel extract, they're all different. They've all got different molecules and different sensitizers. And so, for me I was left with a choice, you know, we either ask for skin irritation to clear sensitization data at max, for the 50 percent ethanol food extract, which I think is 0.01 percent, and the peel extract. Or we rely on the NICNAS study with supercritical CO2 extract and call it good. So, you know, but they're different extracts. So, that's where I came down on this and I was needing some discussion.

DR. TILTON: Yeah, I also noted that they were certainly different. However, I guess I felt that in terms of sensitization, the supercritical extract really contained higher quantities of some of those known potential sensitizers. And since it was tested at 2 percent, I guess I felt like that was pretty conservative compared to what might be expected from the fruit extract. It's not in that Australian study.

DR. ROSS: I was just comparing Table 3 and Table 7.

DR. COHEN: Table 7?

DR. ROSS: Table 3 and Table 7, is my notes. I can look at the PDF. But, I mean, the supercritical has the linalool, the limonene, linalyl acetate. The fruit extract has catechin, quercetin, rutin, hydroxy-sanshool, procyanidin, so they're just very, very different. There's another fruit extract, again, which is totally different, but we don't know the solvent. And the peel extracts is totally different, again, you know, limonene, phellandrene, citronellal.

DR. COHEN: I think once we see the tables with the sensitizers, right. And you see little of very high concentration in Table 3, right?

DR. ROSS: Yeah.

DR. COHEN: It's not going to be surprising that if you use a high enough concentration of this, you'll see some sensitization. I think the concept of clearing a safe when formulated to be non-sensitizing is exactly the method that we would use to deal with this, right?

DR. ROSS: Yeah.

DR. COHEN: Because we're not saying you can't use linalool, and obviously limonene, they're wonderful additives, right? You just have to use them in concentrations that are likely not going to be sensitizing. So this is the opposite situation of the first one. We know they're sensitizers in here and some in very high concentration. I guess the foundational use of safe when formulated to be non-sensitizing is to signal -- listen, don't stack these sensitizers on top of each other that you get to a sensitizing concentration.I think it also, even though that's the fundamental principle for using that conclusion, I think it does signal to everyone, just be careful how much you're putting in, and do your testing and see how this comes out. So, on this one, I was fine clearing safe is used when formulated to be non-sensitizing based on this information.

DR. ROSS: That was my note. I called it safe when formulated to be non-sensitizing. With respect to one of the points, with the ocular, the fruit extract, I think, is used in four products including three eye lotions. There's no max reported in our tables, and there's actually no data according to my notes. Let me just check the Use Table.

DR. BERGFELD: I also had a question about peel water impurities. Which one do you have?

DR. COHEN: What was the question?

DR. BERGFELD: Peel water impurities.

DR. COHEN: Peel --

MS. TUCKER: So, from what I remember, we did not get any information on the peel water.

DR. COHEN: Right. We asked for impurities data on peel water. I commented, in my notes, that the peel water and extract seemed to have very similar methods of manufacturing. And I thought -- let me look back.

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DR. ROSS: Did anyone else have any concerns on the ocular or was that just me?

DR. TILTON: No concentrations reported.

DR. ROSS: Correct, there was no max concentrations and we have no data. So we need both really.

DR. COHEN: What, you're looking for the max use around the eye?

DR. ROSS: Well, you know, when I look at the fruits -- when I look at the fruits on here, it's used in four products, three eye lotions. And I don't have a concentration and I don't have any data.

DR. COHEN: When we're going to clear, we're going to clear at the max concentration that we have in the report.

DR. BERGFELD: 0.01.

DR. COHEN: Yeah.

DR. BERGFELD: The peel is even lower.

DR. COHEN: So, if you substituted that number in, would your concerns about the eye --

DR. ROSS: We have no data on it.

DR. COHEN: We have no data on the eye.

DR. ROSS: It's not just we have no max concentration, we have no -- I mean, you don't want to hold it up unnecessarily with four products, but the fact that it's three eye lotions, which was a little concerning.

DR. COHEN: Hold on. Tom, did you have any issues on eye?

DR. SLAGA: Come again?

DR. COHEN: Did you have any issues with the use around the eye?

DR. SLAGA: Well, if it was a moderate to strong irritant I would have a concern.

DR. COHEN: Well, we have some irritation.

DR. TILTON: He means dermally.

DR. COHEN: Yeah. I'm just going back to the tables. We have so much on sensitization. Well, we have some data at 2 percent that wasn't irritating, right?

DR. BERGFELD: Right. It's far above the use concentrations. It's just a --

COHEN: Far above the use. Like almost two orders of magnitude. I guess when I had read that, it didn't get me caught up on that.

DR. ROSS: Yeah, non-irritating and non-sensitizing, 2 percent.

DR. COHEN: Are we okay to clear?

DR. TILTON: I support that.

DR. ROSS: Yeah. I would go -- and formulated to be non-sensitizing. And that'll come up in the discussion tomorrow that we considered ocular. Again, this is Don's?

DR. COHEN: It's not ours.

DR. ROSS: It's Don's. Yeah.

DR. BERGFELD: Do you want to add the eye stuff to the discussion?

DR. COHEN: We can make a comment in discussion. Yeah, that's exactly --

DR. ROSS: Yeah, good suggestion.

DR. TILTON: I did want to note that in the new table, I had a note --

DR. COHEN: Which table? Table 5 all looks new.

DR. TILTON: No, at the beginning of the report. The one that describes the data. Is that another table number?

DR. HELDRETH: The data profile?

DR. COHEN: You mean not in the report?

DR. TILTON: Oh, the data profile. Mm-hmm.

DR. HELDRETH: Yeah, Page 6

DR. TILTON: Okay. These don't go in the report. I was just noticing that the GRAS status and then the supercritical CO2 studies were actually removed from that table. So, this should be added back.

MS. TUCKER: Yes, I can add those back in.

DR. ROSS: Yeah. I had the same comment I was going to provide to -- (inaudible) no, what happened to the GRAS? **DR. TILTON:** Yeah.

DR. HELDRETH: With regards to the non-sensitizing caveat. And you're absolutely right, historically, when we look at botanicals and we used the non-sensitizing caveat, it's with regard to an aggregate exposure, even possibly from the same product, but you're getting so much of the constituent of concern above the threshold where it may cause sensitization.

It's fine. It's absolute the Panel's prerogative to have a different type of caveat here. But I think we need to make sure that Regina has the information for the discussion section. Because, typically, when we have a botanical and it gets the caveat of non-sensitizing, we have kind of a boilerplate to throw in there that talks about aggregate exposure.

DR. COHEN: I think we're using it in the classic fashion.

DR. HELDRETH: Okay.

DR. COHEN: In this particular case.

DR. HELDRETH: Like for a discrete chemical.

DR. COHEN: Well --

DR. HELDRETH: Where even just the ingredient itself may cause sensitization at the max concentration of use.

DR. COHEN: Yeah, it's possible.

DR. HELDRETH: Right?

DR. COHEN: It's possible.

DR. HELDRETH: Okay. So we can follow that kind of discussion points.

DR. COHEN: Okay.

DR. ROSS: It's posterchild use here. I think it's a great use of when formulated to be non-sensitizing.

DR. COHEN: Yeah. It was developed for the botanicals.

DR. HELDRETH: Historically, we applied safe as use when formulated to be non-sensitizing for discrete chemicals. **DR. COHEN:** Yeah.

DR. HELDRETH: We absolutely are talking about that chemical, itself, may cause sensitization at the concentration of use, at least in some formulations. But typically, historically, with botanicals, we only use the formulated to be non-sensitizing when we're talking about the ingredient itself at max concentration doesn't pose a concern. But if there are other ingredients in that same formulation, or in other formulations that are going to be used at the same time that have the same constituent of concern, there's a concern that we may go above threshold.

DR. BERGFELD: So, you're mixing the two conclusions?

DR. HELDRETH: Right. Right.

DR. BERGFELD: The botanical itself and then the cumulative problem -- aggregate problem.

DR. HELDRETH: Right.

DR. COHEN: Right. You can have several botanical extracts, all of which could have linalool, limonene, citronellal, and they just stack on, right?

DR. BERGFELD: So, this ingredient could be sensitizing at a higher concentrations plus it could be mixed with other things that increase its sensitization.

DR. HELDRETH: Essentially have the language for both.

DR. BERGFELD: We need that in the new format and a mixture.

DR. COHEN: It's understandable how the two methodologies are used for the same conclusion, but on its face it's the same thing. **DR. HELDRETH:** Right.

DR. COHEN: Right. It's like, listen, just formulate this, that if you have sensitizing chemicals in there let's keep it at a certain level. I mean, it gives freedom to operate, for them to use these things as they should have the right concentrations.

DR. HELDRETH: Right? Yeah, it's just that we just want to make sure we have, you know, thorough enough instructions per se or suggestions in the discussion section so formulators can figure this out and create a product that protects consumers.

DR. COHEN: Yep.

DR. BERGFELD: So, are we done with that ingredient?

DR. COHEN: I think we're done. We can move on to MIBK.

DR. ROSS: And no one commented on wrinkle reduction. I thought that would really help me.

DR. COHEN: There's only so much medical science.

DR. ROSS: Guess I guess I walked into that one.

DR. COHEN: This is just to keep everyone in line. We're trying to keep everyone here smooth as possible.

DR. ROSS: Oh, dear.

DR. BERGFELD: But people said to me, why don't you have wrinkles, I said, I'm a derm.

DR. COHEN: Where sworn to secrecy on our youth protocols.

Full Panel-June 13, 2023

DR. BELSITO: Zanthoxylum Piperitum, so this is food. At the December 2022 meeting, we issued an insufficient data announcement for the four Zanthoxylum Piperitum-derived ingredients. And what we're looking for is method of manufacture, composition of the Fruit and the Peel Water, impurities data on the Peel Water and further concentration of use data if available. These are foods, and so we thought that the toxicity tox endpoints were cleared because they are food. And, because they contain potential sensitizers such as citronellol and geranyl acetate -- that I thought were better examples than linalool or limonene which really aren't sensitizers unless they're oxidized -- we would be going out with a formulated to be nonsensitizing. So even though we don't have the appropriate sensitization data, I thought that our conclusion as would be generated anyway would cover that. So we were going safe as used when formulated to be nonsensitizing.

DR. COHEN: Second.

DR. BERGFELD: Any further comment about this ingredient? Do you have anything added to the discussion that needs to be discussed? You have the thinking of why you didn't need the human sensitization or sensitization testing, right, to go in there? **DR. BELSITO**: Right.

DR. COHEN: Use around the eye.

DR. BERGFELD: And the use around the eye.

DR. BELSITO: Right. So food use alleviates our concern for lack of composition and impurities. And the only other thing was whether you felt that we needed to discuss the biological effect on muscle relaxation that occurred at 10-time higher dose then what would be used in cosmetics, PDF Page 37.

DR. BERGFELD: Are you keeping that in, or you're getting rid of it?

DR. BELSITO: I didn't think we needed to discuss it.

DR. BERGFELD: Oh. Yep. No other discussant points then. Okay, then, we're moving on with a safe conclusion. Polyglycerins, Dr. Cohen.

Safety Assessment of Zanthoxylum piperitum-Derived Ingredients as Used in Cosmetics

Status:Draft Final Report for Panel ReviewRelease Date:August 18, 2023Panel Meeting Date:September 11-12, 2023

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ABBREVIATIONS

AICIS	Australian Industrial Chemicals Introduction Scheme
BoNT/A	botulinum toxin type A
CFR	Code of Federal Regulations
cGMP	current good manufacturing practices
CIR	Cosmetic Ingredient Review
CPSC	Consumer Product Safety Commission
Council	Personal Care Products Council
Da	Daltons
DMSO	dimethyl sulfoxide
dw	dry weight
EPA	Environmental Protection Agency
FDA	Food and Drug Administration
FEMA	Flavor and Extract Manufacturers Association
GC-MS	gas chromatography-mass spectrometry
GRAS	generally recognized as safe
HRIPT	human repeated insult patch test
MS/MS	tandem mass spectrometry
MTT	3-(4,5-dimethylthiazol-2-yl)-2,5-diphenyl-2H-tetrazolium bromide
MW	molecular weight
NICNAS	National Industrial Chemicals Notification and Assessment Scheme
OECD	Organization for Economic Co-operation and Development
Panel	Expert Panel for Cosmetic Ingredient Safety
RC	relative content
RIFM	Research Institute for Fragrance Materials
TG	test guideline
US	United States
VCRP	Voluntary Cosmetic Registration Program
wINCI; Dictionary	web-based International Cosmetic Ingredient Dictionary and Handbook

ABSTRACT

The Expert Panel for Cosmetic Ingredient Safety (Panel) assessed the safety of 4 Zanthoxylum piperitum-derived ingredients as used in cosmetic formulations. Collectively, these ingredients are reported to function as skin conditioning agents, skin protectants, biocides, astringents, and fragrance ingredients in cosmetic products. Zanthoxylum piperitum-derived ingredients comprise constituents that may cause adverse effects. Because final product formulations may contain multiple botanicals, each possibly containing the same constituents of concern, formulators are advised to be aware of these constituents and to avoid reaching levels that may be hazardous to consumers. With Zanthoxylum piperitum-derived ingredients, the Panel was concerned about the presence of potential sensitizers (e.g., citronellol and geranyl acetate) in cosmetics. Additionally, industry should minimize impurities, such as heavy metals and pesticide residues, according to limits set by the US Food and Drug Administration (FDA) and the Environmental Protection Agency (EPA). The Panel considered the available data and concluded that the 4 Zanthoxylum piperitum-derived ingredients are safe in cosmetics in the present practices of use and concentration described in this safety assessment when formulated to be non-sensitizing.

INTRODUCTION

The safety of the following 4 Zanthoxylum piperitum-derived ingredients as used in cosmetics is reviewed in this safety assessment.

Zanthoxylum Piperitum Fruit Extract Zanthoxylum Piperitum Oil Zanthoxylum Piperitum Peel Extract Zanthoxylum Piperitum Peel Water

According to the web-based *International Cosmetic Ingredient Dictionary and Handbook* (wINCI; *Dictionary*), collectively, the *Zanthoxylum piperitum*-derived ingredients are reported to function as skin conditioning agents, skin protectants, cosmetic biocides, cosmetic astringents, and fragrance ingredients in cosmetic products (See Table 1).¹ The Panel routinely does not review ingredients that function only as fragrance ingredients, because, as fragrances, the evaluation of the safety of these ingredients is the purview of the Research Institute for Fragrance Materials (RIFM). However, although Zanthoxylum Piperitum Oil is only reported to function as a fragrance ingredient in cosmetics, the safety of this ingredient was neither previously nor currently the subject of review by RIFM; thus, it is included in this review.

These Zanthoxylum piperitum-derived ingredients may contain hundreds of constituents, some of which may have the potential to cause toxic effects. For example, terpenes (e.g., citronellol and geranyl acetate) are potential sensitizers. In this assessment, the Panel will review the potential toxicity of each of the Zanthoxylum piperitum-derived ingredients as a whole, complex mixture; toxicity from single components may not predict the potential toxicity of botanical ingredients.

This safety assessment includes relevant published and unpublished data that are available for each endpoint that is evaluated. The published data in this document were identified by conducting an exhaustive search of the world's literature; this search was last conducted July 2023. A list of the search engines and websites that are used, and the sources that are typically explored, as well as the endpoints that the Panel typically evaluates, is available on the Cosmetic Ingredient Review (CIR) website (<u>https://www.cir-safety.org/supplementaldoc/preliminary-search-engines-and-websites</u>; <u>https://www.cir-safety.org/supplementaldoc/preliminary-search-engines-and-websites</u>; <u>https://www.cir-safety.org/supplementaldoc/cir-report-format-outline</u>)</u>. Unpublished data may be provided by the cosmetics industry, as well as by other interested parties and is included and summarized, where appropriate.

An assessment report on *Zanthoxylum piperitum* extract has been published by the National Industrial Chemicals Notification and Assessment Scheme (NICNAS; now known as the Australian Industrial Chemicals Introduction Scheme (AICIS)).² Because the ingredient in that assessment is identified as *Zanthoxylum piperitum* extract, it is possible that the data could pertain to either Zanthoxylum Piperitum Fruit Extract or Zanthoxylum Piperitum Peel Extract; although, it is not clear which ingredient is being reviewed specifically, these data are included in this review and may inform safety. Please note that this source provides summaries of information generated by industry, and it is those summary data that are reported in this safety assessment when this source is cited.

The names of the ingredients in this report are written in accordance with the INCI naming conventions, i.e., capitalized without italics or abbreviations. When referring to the genus and species from which the ingredients are derived, the standard taxonomic practice of using italics is followed (e.g., *Zanthoxylum piperitum*). It is often not known how the substance being tested in a study compares to the cosmetic ingredient. In the report text, if it is known that the material being tested is a cosmetic ingredient, the INCI naming convention will be used (e.g., *Zanthoxylum Piperitum*). However, if it is not known that the test substance is the same as the cosmetic ingredient, the taxonomic naming conventions (e.g., a *Zanthoxylum piperitum* fruit extract) will be used.

CHEMISTRY

Definition and Plant Identification

All of the *Zanthoxylum piperitum*-derived ingredients named in this assessment have the generic CAS No. 97404-53-0.¹ The definitions for the *Zanthoxylum piperitum*-derived ingredients are presented in Table 1. It should be noted that the chemical class for Zanthoxylum Piperitum Oil is essential oils and water.

Zanthoxylum piperitum (common names, Japanese pepper and Sichuan pepper)¹ is native to East Asia and prevalent in Japan.³ It bears a tiny red fruit between August and September. The fruit includes the pericarp, which is a portion of the fruit that surrounds the seeds.

Chemical Properties

According to a submission to NICNAS, a *Zanthoxylum piperitum* extract (plant part not specified) has an average molecular weight (MW) of constituents equivalent to < 500 Daltons (Da) and a water solubility value of 5.69 mg/l - 1.56 g/l.² These and other properties are presented in Table 2.

Method of Manufacture

Zanthoxylum Piperitum Fruit Extract

A powdered extract of *Zanthoxylum piperitum* was prepared from 100 g of *Zanthoxylum* fruit.⁴ It was extracted by reflux with 1 l of 50% ethanol for 4 h. The extract was concentrated under decompression and powdered by freeze drying at -80°C for 72 h. Eleven grams of *Zanthoxylum piperitum* fruit extract were obtained, resulting in 11% final yield of *Zanthoxylum piperitum*.

Two additional studies describe the manufacturing methods of *Zanthoxylum piperitum* fruit extract from dried fruit. In one instance, 100 g of *Zanthoxylum piperitum* fruit was soaked in 50% ethanol (1 l) at room temperature for 24 h.⁵ The ethanol extract was filtered through filter paper and concentrated in a rotary vacuum evaporator for 30 min to remove the ethanolic base. The concentrated extracts were then freeze-dried. In the second study the dried fruits (1 kg) were soaked in 70% ethanol (10 l) at room temperature for 12 h.⁶ The ethanol extract was filtered through filter paper, and concentrated under a vacuum at 40°C. The concentrated extracts were then freeze-dried and stored at -20°C until use.

Zanthoxylum Piperitum Peel Extract

Zanthoxylum Piperitum Peel Extract can be manufactured by extracting dried raw material with an ethanol solution (70%/vol), and afterwards allowing it to settle as a sediment.⁷ The sediment is then filtrated and adjusted before being packaged. Zanthoxylum Piperitum Peel Extract can also be prepared by extracting the dried raw material with 1,3-butylene glycolic solution (50%/vol) and allowing it to deposit as a sediment. This sediment is again then filtrated and adjusted before being packaged.

The peel of *Zanthoxylum piperitum* fruit was extracted with purified water at 100°C for 1 h.⁸ The soluble extract was then separated from the insoluble waste and concentrated by removal of water under reduced pressure. Spray drying was used to generate dried extract powder.

Zanthoxylum Piperitum Peel Water

In some cases, the definition of the ingredients, as given in the *Dictionary*, provides insight as to the method of manufacture. Zanthoxylum Piperitum Peel Water is the aqueous solution of the steam distillate obtained from the peel of *Zanthoxylum piperitum*.¹

Composition/Impurities

There are more than 50 sanshools present in the *Zanthoxylum* genus.⁹ The main pungent components of *Zanthoxylum piperitum* fruit are sanshool and sanshoolamide.¹⁰ Sanshoamide has also been reported as a component from the fresh unripe fruits of *Zanthoxylum piperitum*.¹¹

Zanthoxylum piperitum extract

According to NICNAS, the degree of purity of a *Zanthoxylum piperitum* extract (supercritical carbon dioxide extract, plant part not specified) is 100%, and it does not contain any additives/adjuvants.² The three constituents present at the highest concentrations in the *Zanthoxylum piperitum* extract tested are: linalyl acetate at 30 - 50% %, linalool at 10 - 20% and limonene at 5 - 10%, accounting for 56.13% (ranging from 45 - 80%) of the composition of the *Zanthoxylum piperitum* extract from the NICNAS report is included in Table 3.²

Zanthoxylum Piperitum Fruit Extract

Zanthoxylum piperitum pericarp extract was obtained utilizing chloroform, n-hexane, diethyl ether, and ethyl acetate, and its amides were isolated independently and analyzed.^{12,13} The highest amide constituent of the pericarp was noted to be hydroxy- α -sanshool (1.89% of dry weight (dw)) and (6RS,11SR)-6,11-dihydroxy-N-(2-hydroxy-2- methylpropyl)-2,7,9-dodecatrienamide (0.41% composition of the extract). Details from these studies are summarized in Table 4.

The amount of tocopherols in the extract from the dried pericarp and seed was determined.¹⁴ The following were found: α -tocopherol (3.2 mg/100 g dw), β -tocopherol (0.12 mg/100 g dw), γ -tocopherol (0.35 mg/100 g dw), and δ -tocopherol (0.27 mg/100 g dw) in the dried pericarp and α -tocopherol (0.12 mg/100 g dw) and γ -tocopherol (2.8 mg/100 g dw) in the seed.

In another study, the total polyphenol and flavonoid content of *Zanthoxylum piperitum* fruit extract was 742.8 ± 3.97 mg gallic acid equivalents/g and 486.8 ± 7.08 mg quercetin equivalents/g, respectively.⁶ Although the individual polyphenols

and flavonoids were not specified, flavone was the major component among this chemical grouping. The dried fruit extract has reported concentrations of 40.342 ± 0.13 and $23.209 \pm 0.04 \,\mu$ g/ml for hyperoside and quercitrin, respectively. The relative standard deviations of both compounds was less than 8.07%.⁵ Additional composition data on *Zanthoxylum piperitum* fruit extracts are found in Table 5 and Table 6.

Zanthoxylum Piperitum Oil

Composition data on *Zanthoxylum piperitum* fruit oil from ripe fruit and from dried pericarp are found in Table 7.^{15,16} Volatile components of *Zanthoxylum piperitum* fruit oil from the ripe fruit include hydrocarbons, alcohols, and esters, primarily D-limonene (11.5%), geraniol (11.0%), citronellal (16.2%) and geranyl acetate, respectively.¹⁵ (Percent composition was calculated by adding all the totals of the relative content (RC) and dividing individual RC). Another study identified similar constituents of *Zanthoxylum piperitum* fruit oil. However, the main component was limonene (37.99%), with minor amounts of sabinene (13.30%), and β-myrcene (7.17%); these 3 represented almost 59% of all the volatile constituents.¹⁷ Data on the major components of *Zanthoxylum piperitum* oil (from whole plant) are found in Table 8.¹⁸

Another study examined the constituents of *Zanthoxylum piperitum* pericarp steam distillate.¹⁹ The following were identified: carveol, β -caryophyllene oxide, 1,8-cineole, citronellal, citronellol, citronellyl acetate, α -copaene, cuminaldehyde, cuminyl alcohol, *p*-cymene, geranyl acetate, limonene, linalool, linalool oxide, β -myrcene, α -pinene, β -pinene, piperitone, and, α -terpineol.

Constituents of the essential oil obtained from leaves of *Zanthoxylum piperitum* were determined via GC-MS analysis.²⁰ The major components were identified as D-limonene (18%), geranyl acetate (15.3%), cryptone (8.5%), citronellal (7.1%), cuminal (6.2%), and phellandral (5.2%).

Zanthoxylum Piperitum Peel Extract

The composition of Zanthoxylum Piperitum Peel Extract from an ethanol solvent contains triterpene and tannin (% composition not specified).⁷ Impurities of this extract include heavy metals, not more than 20 ppm, and arsenic, not more than 2 ppm. The composition of the extract from the 1,3-butylene glycolic solution yield triterpenoids (% composition not mentioned) along with heavy metals, no more than 10 ppm and arsenic, no more than 2 ppm.

The volatile compounds from the skin of the mature fruit of *Zanthoxylum piperitum* extracted with methyl *t*-butyl ether were analyzed with gas chromatography – mass spectrometry (GC-MS).³ The composition can be found in Table 9.

The composition of a methanolic extract of a *Zanthoxylum piperitum* peel was determined.²¹ The results, obtained using GC-MS, are also shown in Table 9.

USE

Cosmetic

The safety of the cosmetic ingredients addressed in this assessment is evaluated based on data received from the US FDA and the cosmetics industry on the expected use of these ingredients in cosmetics and does not cover their use in airbrush delivery systems. Data are submitted by the cosmetic industry via the FDA's Voluntary Cosmetic Registration Program (VCRP) database (frequency of use) and in response to a survey conducted by the Personal Care Products Council (Council) (maximum use concentrations). The data are provided by cosmetic product categories, based on 21CFR Part 720. For most cosmetic product categories, 21CFR Part 720 does not indicate type of application and, therefore, airbrush application is not considered. Airbrush delivery systems are within the purview of the US Consumer Product Safety Commission (CPSC), while ingredients, as used in airbrush delivery systems, are within the jurisdiction of the FDA. Airbrush delivery system use for cosmetic application has not been evaluated by the CPSC, nor has the use of cosmetic ingredients in airbrush technology been evaluated by the FDA. Moreover, no consumer habits and practices data or particle size data are publicly available to evaluate the exposure associated with this use type, thereby preempting the ability to evaluate risk or safety.

According to 2023 VCRP data, Zanthoxylum Piperitum Fruit Extract is reported to be used in 183 cosmetic products (Table 10).²² Although this ingredient has the highest reported frequency of use for the ingredients in this group, and it is used in numerous product categories in the VCRP, the results of a concentration of use survey provided by the Council in 2021 only report concentration of use data for Zanthoxylum Piperitum Fruit Extract in one product category; according to the survey, it is used at a maximum concentration of up to 0.01% in spray body and hand products.²³ Zanthoxylum Piperitum Peel Extract is the only other ingredient in this report that is reported to be in use; it is reported to be used in 19 formulations at maximum use concentrations up to 0.0022% in make-up and skin care preparations. According to VCRP and Council survey data, 2 of the 4 ingredients, i.e., Zanthoxylum Piperitum Oil and Zanthoxylum Piperitum Peel Water, are not currently in use in cosmetic products (Table 11).

Cosmetic products containing *Zanthoxylum piperitum*-derived ingredients may incidentally come in contact with the eyes or mucous membranes (concentration data for these formulation-types not provided). It should be noted that Zanthoxylum Piperitum Fruit Extract is reported to be used in 5 baby products (use concentration not provided). Additionally, some of the ingredients are used in cosmetic sprays and powders, and could possibly be inhaled; for example, Zanthoxylum Piperitum Fruit Extract and Zanthoxylum Piperitum Peel Extract are reported to be used in products that are

known to be sprayed (up to 0.01% in body and hand products and up to 0.0000018% in night products, respectively), and Zanthoxylum Piperitum Peel Extract is reported to be used in face powders at a maximum use concentration of 0.0000022%. In practice, as stated in the Panel's respiratory exposure resource document (<u>https://www.cir-safety.org/cir-findings</u>), most droplets /particles incidentally inhaled from cosmetic sprays would be deposited in the nasopharyngeal and tracheobronchial regions and would not be respirable (i.e., they would not enter the lungs) to any appreciable amount. Conservative estimates of inhalation exposures to respirable particles during the use of loose powder cosmetic products are 400-fold to 1000-fold less than protective regulatory and guidance limits for inert airborne respirable particles in the workplace.

Although products containing some of these ingredients may be marketed for use with airbrush delivery systems, this information is not available from the VCRP or the Council survey. Without information regarding the frequency and concentrations of use of these ingredients (and without consumer habits and practices data or particle size data related to this use technology), the data are insufficient to evaluate the exposure resulting from cosmetics applied via airbrush delivery systems.

The *Zanthoxylum piperitum*-derived ingredients are not restricted from use in any way under the rules governing cosmetic products in the European Union.²⁴

Non-Cosmetic

Zanthoxylum piperitum extract appears on the Flavor and Extract Manufacturers Association's (FEMA) list of flavoring ingredients that are classified as generally recognized as safe (GRAS) under the 1958 food additives amendment to the US Federal Food, Drug, and Cosmetics Act.²⁵ As a result of its lemon-like aroma and pungent taste, Japanese pepper (Rutaceae, *Zanthoxylum piperitum*) is commonly used in Japanese dishes as a spice and for seasoning to mask unpleasant odors that arise from fish and meat ingredients.³ Specifically, the fresh young leaves of the plant, as well as the fruit pericarp, are used as spices in Japanese cuisine.¹⁰ According to another source, fruit peels and leaves of *Zanthoxylum piperitum* (Rutaceae) have been used in Japan for centuries as spices to preserve foods.²¹

Zanthoxylum piperitum is among the Korean medicinal plants (Korean salad plants), so named due to their content of purported bioactive compounds, mainly antioxidant phenolics.²⁶ *Zanthoxylum piperitum* fruit extract has been indicated to alleviate rheumatoid arthritis, inhibit alveolar bone loss, reduce weight gain, decrease adipocytes and adipose tissue mass, and act as a therapeutic agent for osteoporosis.^{4-6,27}

TOXICOKINETIC STUDIES

Dermal Penetration

Zanthoxylum piperitum extract

NICNAS noted that given the low molecular weight of the components of *Zanthoxylum piperitum* extract (supercritical carbon dioxide extract, < 500 Da; plant part not specified), its water solubility (5.69 mg/l - 1.56 g/l), and a log P_{ow} of 2.9 - 4.4, there is potential for *Zanthoxylum piperitum* extract to cross biological membranes.²

Absorption, Distribution, Metabolism, and Excretion

Zanthoxylum Piperitum Fruit Extract

The pharmacokinetics of a mixture containing *Zanthoxylum piperitum* fruit was studied using 16 subjects (fasted).²⁸ The mixture had the following composition: *Zanthoxylum piperitum* fruit, ginger, ginseng, and maltose. A randomized, open-label, three-arm, three-period protocol was used. The mixture was administered orally to each subject in doses of 2.5, 5, and 10 g. Blood samples were collected just before and at the following intervals after administration: 0.25, 0.5, 1, 2, 3, 4, 8, 12, 24, and 48 h. Plasma fractions were stored prior to analysis by high performance liquid chromatography. Of the 6 compounds measured, hydroxy- α -sanshool, a constituent of *Zanthoxylum piperitum* fruit, had the highest plasma concentration of the mixture. The plasma concentration of hydroxy- α -sanshool reached the maximum concentration within 30 min after administration. Its median half-life was 1.6 to 1.7 h, indicating rapid absorption and elimination. The maximum concentration of hydroxy- α -sanshool in the plasma was 209 – 664 ng/ml. The other compounds measured following administration of the test mixture were: hydroxy- β -sanshool (maximum concentration of 42.2 – 131 ng/ml reached 30 min after administration, half-life 1.1 h); [6]-shogaol (maximum concentration of 0.076 - 0.262 ng/ml reached after 15 min, half-life 0.3 - 0.6 h); [10]-shogaol (maximum concentration of 0.29 - 1.2 ng/ml reached after 30 min, half-life 0.8 - 1.5 h); ginsenoside Rb₁ (maximum concentration of 0.05 - 0.12 ng/ml reached at 4 h, half-life of 37.8 - 41 h); and ginsenoside Rg₁ (maximum concentration of 0.0198 - 0.023 ng/ml reached at 2 h, half-life of 4.4 - 27.8 h). However, it is not mentioned if the compounds are directly from *Zanthoxylum piperitum* or from other ingredients of the mixture.

TOXICOLOGICAL STUDIES

Acute Toxicity Studies

Data on the acute toxicity of Zanthoxylum piperitum-derived ingredients reviewed in this safety assessment were not found in the published literature, nor were these data submitted.

Short-Term, Subchronic, and Chronic Toxicity Studies

Data on the short-term, subchronic, and chronic toxicity of Zanthoxylum piperitum-derived ingredients reviewed in this safety assessment were not found in the published literature, nor were these data submitted.

DEVELOPMENTAL AND REPRODUCTIVE TOXICITY STUDIES

Data on the developmental and reproductive toxicity of Zanthoxylum piperitum-derived ingredients reviewed in this safety assessment were not found in the published literature, nor were these data submitted.

GENOTOXICITY STUDIES

The in vitro and in vivo genotoxicity studies summarized below are presented in Table 12.

In the Ames test (Organisation for Economic Co-operation and Development test guideline (OECD TG) 471), a *Zanthoxylum piperitum* extract (carbon dioxide extract, in acetone; plant part not specified) was evaluated using the following bacterial strains: *Salmonella typhimurium* strains TA1535, TA1537, TA98, and TA100, and *Escherichia coli* strain WP2uvrA.² At concentrations up to 5000 μ g/plate (with and without metabolic activation), results were negative. The genotoxicity of a *Zanthoxylum piperitum* extract (supercritical carbon dioxide extract, in dimethyl sulfoxide (DMSO)) in human lymphocytes was evaluated in the mammalian cell micronucleus test (OECD TG 487). The test concentrations were up to 640 μ g/ml (without metabolic activation) and up to 320 μ g/ml (with metabolic activation). Results indicated that the test substance was neither clastogenic nor aneugenic in the presence or absence of metabolic activation.

In Ames test, *Zanthoxylum piperitum*-derived essential oil was evaluated with *S. typhimurium* strains TA1535, TA1537, TA98, and TA100, and *E. coli* strain WP2uvrA at concentrations up to 1000 µg/ml (with and without metabolic activation), results were negative.²⁰ In an in vitro mammalian chromosome aberration test performed in accordance with OECD TG 473, *Zanthoxylum piperitum*-derived essential oil was tested on Chinese hamster lung cells at concentrations up to 300 µg/ml. Significant chromosomal aberrations were not observed. In a bone marrow micronucleus test, bone marrow of femur bones of 6 male and female ICR mice/group were analyzed after being given 250, 500, or 1000 mg/kg bw/d *Zanthoxylum piperitum*-derived essential oil orally for 2 d. Bone marrow analysis showed no abnormalities and the test article was not clastogenic.

CARCINOGENICITY STUDIES

Data on the carcinogenicity of *Zanthoxylum piperitum*-derived ingredients reviewed in this safety assessment were not found in the published literature, nor were these data submitted.

ANTI-CARCINOGENICITY STUDIES

Zanthoxylum Piperitum Fruit Extract

A Zanthoxylum piperitum fruit extract and its ability to induce autophagic cell death was examined.⁸ Using phasecontrast microscopy, cells were treated for 24 h with 200 µg/ml of a Zanthoxylum piperitum fruit extract, and vacuoles were observed in the cytoplasm. Cell proliferation assays were performed after 48 h of treatment, and proliferation in at least 3 cell lines was inhibited. In a human colorectal cell line, after 72 h of treatment, the viability and number of cancer cells was reduced. To further confirm the induction of autophagy, Western blot analysis was performed to analyze the conversion of cytosolic LC3-1 into LC3 II in DLD-1 cells. This demonstrated autophagic activity. Quantitative RT-qPCR and Western blot were also utilized to examine the ability of an essential protein to prevent a Zanthoxylum piperitum fruit extract from inducing autophagic cell death. The phosphorylation of c-Jun-N-terminal kinase in 6 different types of cancer cells was also measured via Western blot analysis. To explore the effect of a Zanthoxylum piperitum fruit extract on normal cells, a rat intestinal cell line was treated with Zanthoxylum piperitum fruit extract and examined. Zanthoxylum piperitum fruit extract appears to induce JNK-dependent autophagic cell death.

Zanthoxylum piperitum extract

Zanthoxylum piperitum extract and its ability to display anti-cancer activity in human cell lines (Calu-6 for human pulmonary carcinoma and SMU-601 for human gastric carcinoma) was examined using the 3-(4,5-dimethylthiazol-2-yl)-2,5-diphenyl-2H-tetrazolium bromide (MTT) assay.²⁶ Serial dilutions of *Zanthoxylum piperitum* extract (dried methanol extract) were prepared by dissolving the extract in DMSO, followed by dilution with medium to yield the following final concentrations: 25, 50, 100, 200, 400, and 800 µg/ml. Optical density was recorded using a micro plate reader at 540 nm. Distilled water served as the positive control, and DMSO served as the solvent control. Controls and samples were assayed in duplicate for each concentration and replicated three times for each cell line. Cytotoxicity was obtained by comparing absorbance between the samples and the control. The values obtained were then used to calculate the concentration of *Zanthoxylum piperitum* extract required to cause a 50% reduction (IC₅₀, in µg/ml) in growth (cell number) for each cell line. In the Calu-6 cell line, the IC₅₀ value for *Zanthoxylum piperitum* extract was 349.0 ± 9.1 µg/ml. Additionally, a dose-dependent inhibition of cell proliferation was observed in this study.

DERMAL IRRITATION AND SENSITIZATION STUDIES

<u>Human</u>

Zanthoxylum piperitum extract

The skin sensitization potential of 2% Zanthoxylum piperitum extract (super critical carbon dioxide extract; plant part not specified) in ethanol:diethyl phthalate (1:3 w/w) was evaluated in a human repeated-insult patch test (HRIPT) involving 110 subjects.² Two different samples of the test substance were tested on each subject. During induction, the test substance (on a 3.62 cm² occlusive patch) was applied to the same location on the back of each subject 3 times per week for a total of 9 applications. Test sites were examined for dermal irritation at each visit prior to re-application of the test substance. Approximately 10 to 21 d after the final visit of the induction phase, the challenge phase was initiated. The test substance was applied for ~ 24 h to a new site on the back. Test sites were examined for signs of dermal irritation or sensitization. The test substance did not elicit skin irritation or sensitization during the challenge phase and was classified as a non-sensitizer.

OCULAR IRRITATION STUDIES

Data on the ocular irritation potential of the Zanthoxylum piperitum-derived ingredients reviewed in this safety assessment were not found in the published literature, nor were these data submitted.

CLINICAL STUDIES

Zanthoxylum Piperitum Fruit Extract

The mechanisms, components, synergistic effects, and topical effects of a *Zanthoxylum piperitum* fruit extract were all examined in one study to determine methods to reduce wrinkles non-invasively via mechanisms similar to botulinum toxin type A (BoNT/A) injection.²⁹ Two in vitro assays (a co-cultured cell-based muscle contraction assay and a muscle contraction assay in *Caenorhabditis elegans*) were performed and *Zanthoxylum piperitum* was identified as a BoNT/A-like reagent that induced a 27.7% decrease in muscle contraction rates at a concentration of 1000 ppm. A test performed with the Neurotransmitter Transporter Uptake Assay Kit with modifications to assess the ability of *Zanthoxylum piperitum* fruit extract to regulate signal transduction in neurons indicated that muscle contraction is inhibited by attenuating electric signal transduction in presynaptic neurons. Furthermore, two components of a *Zanthoxylum piperitum* fruit extract, quercitrin and hyperoside, were examined for their role in muscle contraction. Quercitrin was found to be responsible for muscle contraction inhibition.

Finally, the effect of topical treatment of a *Zanthoxylum piperitum* fruit extract on facial wrinkles was determined. Twenty-three women aged 38 and older completed the study. The study was randomized, double-blind, and placebocontrolled. The participants were divided into a placebo group (n = 8), a *Zanthoxylum piperitum* fruit extract-treated group (n = 7, 60 ppm), and a *Zanthoxylum piperitum* fruit extract (60 ppm) with acetyl hexapeptide-8 (50 ppm)-treated group (n = 8). Lateral canthal rhytides were evaluated after daily application for 0, 4, 8, and 12 wk using a 3D skin imaging system. Compared to placebo treatment, *Zanthoxylum piperitum* fruit extract treatment for 12 wk ameliorated lateral canthal rhytides. The topical treatment of *Zanthoxylum piperitum* fruit extract improved the appearance of lateral canthal rhytides by 11.4%. It was also determined that *Zanthoxylum piperitum* fruit extract and acetyl hexapeptide-8 have synergistic effects on wrinkle improvement.

SUMMARY

The safety of the following 4 Zanthoxylum piperitum-derived ingredients as used in cosmetics is reviewed in this safety assessment: Zanthoxylum Piperitum Fruit Extract, Zanthoxylum Piperitum Oil, Zanthoxylum Piperitum Peel Extract, and Zanthoxylum Piperitum Peel Water. According to the *Dictionary*, collectively, the *Zanthoxylum piperitum*-derived ingredients are reported to function as skin conditioning agents, skin protectants, biocides, astringents, and fragrance ingredients in cosmetic products.

Zanthoxylum piperitum (i.e., Japanese pepper; Rutaceae) is native to East Asia and prevalent in Japan. It bears a tiny red fruit between August and September. The available composition data indicate that *Zanthoxylum piperitum*-derived ingredients consist of numerous volatile aromatic and aliphatic hydrocarbons.

According to 2023 VCRP data, Zanthoxylum Piperitum Fruit Extract is reported to be used in 183 cosmetic products. The results of a concentration of use survey provided by the Council in 2021 only reported maximum use concentration data for Zanthoxylum Piperitum Fruit Extract in one product category (i.e., at up to 0.01% in body and hand spray products). Zanthoxylum Piperitum Peel Extract is the only other ingredient in this report for which use concentration data are being reported; this ingredient is being used at maximum use concentrations of up to 0.0022% in make-up and skin care preparations.

Zanthoxylum piperitum extract appears on the FEMA list of flavoring ingredients that are classified as GRAS under the 1958 food additives amendment to the US Federal Food, Drug, and Cosmetics Act.

NICNAS noted that given the low molecular weight of the components of *Zanthoxylum piperitum* extract (supercritical carbon dioxide extract, < 500 Da, plant part not specified), its water solubility (5.69 mg/l - 1.56 g/l), and a log P_{ow} of 2.9 - 4.4, there is potential for *Zanthoxylum piperitum* extract to cross biological membranes.

The pharmacokinetics of a mixture containing *Zanthoxylum piperitum* fruit was studied using 16 subjects (fasted). The mixture was administered orally to each subject in doses up to 10 g. Of the 6 compounds measured, hydroxy- α -sanshool, a constituent of *Zanthoxylum piperitum* fruit, had the highest plasma concentration (maximum concentration range: 209 to 664 ng/ml) of the mixture. Its median half-life was 1.6 to 1.7 h, indicating rapid absorption and elimination.

A Zanthoxylum piperitum extract (supercritical carbon dioxide extract, in acetone, plant part not specified) was not mutagenic in an Ames test when tested at concentrations of up to $5000 \ \mu g/plate$, with or without metabolic activation. Results were also negative in an in vitro micronucleus test, whereby human lymphocytes were incubated with Zanthoxylum piperitum extract (supercritical carbon dioxide extract, in DMSO, plant part not specified) at concentrations up to $640 \ \mu g/ml$ (without metabolic activation) and up to $320 \ \mu g/ml$ (with metabolic activation). Neither a statistically nor biologically significant increase in the number of micronucleated cells was observed, and the test substance was neither clastogenic nor aneugenic to human lymphocytes. In an Ames test, Zanthoxylum piperitum essential oil was not mutagenic when tested at concentrations up to $1000 \ \mu g/ml$ with and without metabolic activation. A mammalian chromosome aberration test of Zanthoxylum piperitum essential oil at concentrations up to $300 \ \mu g/ml$ was also negative in Chinese hamster lung cells. In a bone marrow micronucleus test, groups of 6 male and 6 female ICR mice were orally given up to $1000 \ m g/kg \ bw/d$ Zanthoxylum piperitum essential oil for 2 d; no abnormalities were observed, and the test article was not clastogenic.

The ability of a *Zanthoxylum piperitum* fruit extract to induce autophagic cell death was studied. Using phase-contrast microscopy, cells were treated for 24 h with 200 µg/ml of the *Zanthoxylum piperitum* fruit extract, and vacuoles were observed in the cytoplasm. Cell proliferation in at least 3 cell lines was inhibited. In a human colorectal cell line, the viability and number of cancer cells was reduced. The phosphorylation of c-Jun-N-terminal kinase in 6 different types of cancer cells was also measured. *Zanthoxylum piperitum* fruit extract appears to induce JNK-dependent autophagic cell death.

Apoptosis of *Zanthoxylum piperitum* extract in human cancer cell lines (Calu-6 for human pulmonary carcinoma and SMU-601 for human gastric carcinoma) was measured using the MTT assay to evaluate anti-cancer activity potential. The following concentrations (in DMSO) were tested: 25, 50, 100, 200, 400, and 800 µg/ml. In the Calu-6 cell line, the IC₅₀ value for *Zanthoxylum piperitum* extract was 470.4 \pm 13.1 µg/ml. In the SMU-601 cell line, the IC₅₀ value for *Zanthoxylum piperitum* extract was 470.4 \pm 13.1 µg/ml. In the SMU-601 cell line, the IC₅₀ value for *Zanthoxylum piperitum* extract was 349.0 \pm 9.1 µg/ml. Additionally, a dose-dependent inhibition of cell proliferation was observed.

The skin sensitization potential of 2% Zanthoxylum piperitum extract (supercritical carbon dioxide extract, plant part not specified) in ethanol:diethyl phthalate (1:3 w/w) was evaluated in an HRIPT involving 110 subjects. During induction, the test substance (on a 3.62 cm² occlusive patch) was applied repeatedly to the back. At challenge, the test substance was applied for ~ 24 h to a new site on the back. The test substance induced neither skin irritation nor sensitization.

The mechanisms, components, synergistic effects, and topical effects of a *Zanthoxylum piperitum* fruit extract were examined in one study to determine methods to reduce wrinkles non-invasively via mechanisms similar to BoNT/A injection. The *Zanthoxylum piperitum* fruit extract improved the appearance of lateral canthal rhytides in humans.

DISCUSSION

This assessment reviews the safety of 4 Zanthoxylum piperitum-derived ingredients as used in cosmetic formulations. The Panel concluded that the available data are sufficient for determining safety of all 4 ingredients for use in cosmetic products when the products are formulated to be non-sensitizing.

Because final product formulations may contain multiple botanicals, each possibly containing the same constituents of concern, formulators are advised to be aware of these constituents and to avoid reaching levels that may be hazardous to consumers. For *Zanthoxylum piperitum*-derived ingredients, the Panel was concerned about the presence of multiple terpenes (e.g., citronellol and geranyl acetate) in cosmetics, which could result in sensitization reactions. Therefore, when formulating products, manufacturers should avoid reaching levels of plant constituents that may cause sensitization or other adverse health effects. Although an HRIPT of *Zanthoxylum piperitum* extract (super critical carbon dioxide extract; plant part not specified) in ethanol at 2% deemed the test substance neither a sensitizer nor an irritant, the Panel felt that, overall, there was a limited amount of sensitization data. However, the Panel was of the opinion that the need for additional sensitization data was mitigated by the caveat in the conclusion that products containing *Zanthoxylum piperitum*-derived ingredients must be formulated to be non-sensitizing.

Additionally, the Panel noted that although there was a lack of general toxicity data, *Zanthoxylum piperitum* extract is classified as GRAS, and its GRAS status mitigated toxicity concerns. Its use in foods also alleviated concerns regarding composition and the presence of impurities. Furthermore, the Panel noted these ingredients are not expected to absorb through the skin and have low reported maximum concentrations of use (i.e., 0.01% in skin preparations). Also, the Panel found that because the composition of a *Zanthoxylum piperitum* essential oil derived from the leaf is similar to the *Zanthoxylum piperitum*-derived ingredients reviewed in this report, genotoxicity studies on the oil served to further inform safety.

The Panel also expressed concern about heavy metals, pesticide residues, and other plant species that may be present in botanical ingredients. They stressed that the cosmetics industry should continue to minimize impurities in cosmetic formulations according to limits set by the US FDA and EPA.

The Panel discussed the issue of incidental inhalation exposure resulting from these ingredients (for example, Zanthoxylum Piperitum Fruit Extract is reported to be used at up to 0.01% in spray body and hand products). Inhalation toxicity data were not available. However, the Panel noted that the majority of droplets/particles would not be respirable to any appreciable amount. Furthermore, droplets/particles deposited in the nasopharyngeal or tracheobronchial regions of the respiratory tract present no toxicological concerns based on the chemical and biological properties of these ingredients. Coupled with the small actual exposure in the breathing zone and the low concentrations at which these ingredients are used (or expected to be used) in potentially inhaled products, the available information indicates that incidental inhalation would not be a significant route of exposure that might lead to local respiratory or systemic effects. A detailed discussion and summary of the Panel's approach to evaluating incidental inhalation exposures to ingredients in cosmetic products is available at https://www.cir-safety.org/cir-findings.

Finally, the Panel's respiratory exposure resource document (see link above) notes that airbrush technology presents a potential safety concern, and that no data are available for consumer habits and practices thereof. As a result of deficiencies in these critical data needs, the safety of cosmetic ingredients applied by airbrush delivery systems cannot be assessed by the Panel. Therefore, the Panel has found the data insufficient to support the safe use of cosmetic ingredients applied via an airbrush delivery system.

CONCLUSION

The Expert Panel for Cosmetic Ingredient Safety concluded that the following 4 *Zanthoxylum piperitum*-derived ingredients are safe in cosmetics in the present practices of use and concentration described in this safety assessment when formulated to be non-sensitizing:

Zanthoxylum Piperitum Fruit Extract Zanthoxylum Piperitum Oil* Zanthoxylum Piperitum Peel Extract Zanthoxylum Piperitum Peel Water*

*Not reported to be in current use. Were ingredients in this group not in current use to be used in the future, the expectation is that they would be used in the product categories and at concentrations comparable to others in this group.

TABLES

	Table 1.	Definitions an	d reported	functions	of the	ingredients	in this	safety	assessmen
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Ingredient/CAS No.	Definition & Structures	Function(s)
Zanthoxylum Piperitum Fruit Extract 97404-53-0 (generic)	Zanthoxylum Piperitum Fruit Extract is the extract of the fruit of <i>Zanthoxylum piperitum</i> .	Skin-Conditioning Agents - Miscellaneous
Zanthoxylum Piperitum Oil 97404-53-0 (generic)	Zanthoxylum Piperitum Oil is the oil obtained from the fruit and fruit pericarp of <i>Zanthoxylum piperitum</i> .	Fragrance Ingredients
Zanthoxylum Piperitum Peel Extract 97404-53-0 (generic)	Zanthoxylum Piperitum Peel Extract is the extract of the peels of Zanthoxylum piperitum.	Cosmetic Biocides
Zanthoxylum Piperitum Peel Water 97404-53-0 (generic)	Zanthoxylum Piperitum Peel Water is the aqueous solution of the steam distillate obtained from the peel of <i>Zanthoxylum piperitum</i> .	Cosmetic Astringents; Fragrance Ingredients; Skin Protectants; Skin-Conditioning Agents - Miscellaneous

Table 2. Chemical proper	rties of a Zanthoxyli	m piperitum extract	(supercritical	l carbon dioxide	;) ²
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Property	Value
Physical Form (@ 20°C and 101.3 kPa)	liquid
Molecular weight (Da; average of constituents)	< 500
Density (g/ml)	0.8984 - 0.9284
Water solubility (g/l)	0.00569 – 1.56 (estimated)
Partition coefficient (log Pow)	2.9 – 3.9 (aliphatic terpene constituents) (estimated)
	4.2 - 4.4 (aliphatic cyclic constituents) (estimated)
Vapor pressure (kPa, @ 24 °C)	0.0249
Melting point (°C)	< -20 – 156 (based on primary constituents)
Boiling point (°C)	176 – 421 (based on primary constituents)
Flash point (°C. @ 101.3 kPa)	39

Table 3. Composition data on a Zanthoxylum piperitum extract²

Zanthoxylum piperitum extract (supercritical carbon dioxide extract)	
Constituents	Composition (%)
linalyl acetate	30 - 50
linalool	10 - 20
limonene	5 - 10
3-cyclohexene-1-methanol, α, α,4-trimethyl-, 1-acetate	1-5
bicyclo [3.1.0] hexan-2-ol, 2-methyl-5-(1- methylethyl)-, 2- acetate;	5 - 15
bicyclo [3.1.0]hexan-2-ol, 2-methyl-5-(1- methylethyl)-, 2- acetate, (1 <i>R</i> ,2 <i>S</i> ,5 <i>S</i>)- rel-	
2,6,8,10-dodecatetraenamide, N-(2-hydroxy-2- methyl propyl)-, (2E,6E,8E,10E)-	1 - 10

Table 4. Amide composition of Zanthoxylum piperitum fruit pericarp extract^{12,13}

Zanthoxylum piperitum fruit (fruit pericarp ethyl acetate extract)			
Constituents	Quantity (mg)	% composition*	% of dry weight**
(6RS) -(2E,7E,9E)-6-hydroxy-N-(2-hydroxy-2-methylpropyl)-11-oxo-2,7,9-	5.4	0.13	
dodecatrienamide			
(11RS)- (2E,7E,9E)-11-hydroxy-N-(2-hydroxy-2-methyl-propyl)-6-oxo-2,7,9-	4.8	0.11	
dodecatrienamide			
(10RS,11SR)-dihydroxy-N-(2-hydroxy-2-methylpropyl)-2,6,8-dodecatrienamide	10.1	0.24	
(10RS,11RS) -(2E,6Z,8E)- dihydroxy-N-(2-hydroxy-2-methylpropyl)-2,6,8-	4	0.10	
dodecatrienamide			
(6RS,11SR)-6,11-dihydroxy-N-(2-hydroxy-2- methylpropyl)-2,7,9-	17.2	0.41	
dodecatrienamide)			
(6RS,11RS) -(2E,7E,9E)-6,11-dihydroxy-N-(2-hydroxy-2- methylpropyl)-2,7,9-	9.5	0.23	
dodecatrienamide)			
α-sanshool			0.32
γ-sanshool			0.21
hydroxy-γ-sanshool			0.08
hydroxy-α-sanshool			1.89

* percent composition calculated from 4.2 grams of extract ** percent of dry weight pericarp (37 – 150 g pericarp used in this experiment)

Constituents	Area (%)*
myrcene	1.49
3(5)-[[1,2-dihydroxy-3-propoxy]methyl]-4hydroxy-1h-pyrazole-5(3)-carboxamide	0.09
β-phellandrene	4.28
hex-3-yne	0.10
3-hydroxycyclohexanone	0.06
isopropyl hexanoate	0.12
terpinolene	0.59
vinylcyclooctane	0.07
2-tetradecynoic acid	0.10
citronellal	2.75
3-hydroxy-2,3-dihydromaltol	0.67
pulegol	0.29
octanoic acid	0.24
(e)-4-undecenal	0.10
4-isopropyl-2-cyclohexenone	1.04
citronellol	1.20
(e)-beta-ocimene	0.39
3,7-dimethylocta-2,6-dien-1-ol	0.65
spiro[4.4]nona-1,3-diene, 1,2-dimethyl-	0.21
piperitone	0.41
nonanoic acid	0.42
8,8-dimethoxy-2,6-dimethyloct-2-ene	0.98
p-isopropylbenzyl formate	0.40
citronellic acid	0.55
α-terpinene	0.24
2,6-octadiene, 2,6-dimethyl-	1.60
terpinyl propionate	0.43
geranyl acetate	4.60
3-methylcyclohexene	0.21
1,4-dimethyl-4beta-methoxy-2,5cyclohexadien-1α-ol	0.33
2-propenoic acid, 3-phenyl-, methyl ester	0.49
6-methylenespiro[4.5]decane	0.07
β-caryophyllene	0.67
bergamotane	0.09
3-methyl-4,7-dioxo-oct-2-enal	0.30
2,6-dimethyl-3,5,7-octatriene-2-ol, z,z-	0.24
2-dodecenoic acid	0.12
1.6.10-dodecatrien-3-ol. 3.7.11-trimethyl-	0.35
1-methyldecahydronaphthalene	0.46
cadina-1(10).4-diene	0.34
2-(4-methylcyclohexyl)prop-2-en-1-ol	0.42
tetradec-13-enal	0.24
9-octadecenoic acid	0.15
1 2-di-but-2-envl-cvclobexane	0.10
4 12 12-trimethyl-9-methylene-5-oxatricyclo[8 2 0 04 6]dodecane	0.11
3.4-o-isopropylidene-d-galactose	0.08
2-hexenoic acid 6-cyclohexyl-	0.00
hentadec-8-ene	0.22
octane	0.35
myristic acid	0.55
D-(-)-kinic acid	1 35
nonadecanoic acid	0.35
10-bromoundecanoic acid	0.55 0.77
stearie acid	0.77
eveteamine s.sulfate	1 77
limonene dioxide	0.22
2 6_dimethyl_4_nitro_3_nhenyl_cyclobevonone	0.25
2,0-amounter-man of phony i-cyclolic Xallolic	0.20
2.6 dimethyl 1.2.6 hantatriana	0.40
2,0-uniting-1,5,0-neptatriene	0.08
pammuc acid	2.65
	1.58
2-meinyi-o-meinyiene-1,/-octadien-3-one	0./5
DIS(5-DENZYI-2,4PENTANEGIONATO)pailadium(11)	1.03
pentamethylbenzenesultonyl chloride	6.52
Myrtenal	3.77

 Table 5. Composition data on Zanthoxylum piperitum fruit extract (methanol extract).27

Constituents	Area (%)*
n,n-dimethyl-2-phenylethen-1-amine	20.61
allyl(chloromethyl)dimethylsilane	7.64
cyclohexene, 4-(4-ethylcyclohexyl)-1-pentyl-	1.64
3-epicycloeucalenol	1.09
2,5-furandione, 3-dodecenyl-	0.61
1-cinnamyl-3-methylindole-2-carbaldehyde	1.35
glyceryl palmitate	4.82
2-methyl-z,z-3,13-octadecadienol	0.37
pentadeca-2,3,6,9,12,13-hexaen-8-one, 2,5,5,11,11,14-hexamethyl-	0.51
6-(3,4-dimethoxy-phenyl)-8-ethoxy-1,3-dimethyl-cyclohepta[c]furan-4-one	1.04
monoolein	2.02
cyclohexene, 4-(4-ethylcyclohexyl)-1-pentyl-	1.56
cedrane-8,13-diol	0.12
26,27-dinorergosta-5,23-dien-3β-ol	0.18
cholest-4-en-3-one, 14-methyl-	0.07
(+)-sesamolin	0.08
5,5'-[tetrahydro-1h,3h-furo[3,4-c]furan-1,4-diylbis(oxy)]bis(2h-1,3-benzodioxole)	0.32
campesterol	0.12
stigmasta-5,22-dien-3-ol	0.06
clionasterol	0.15

* Peak area in GC-MS

Table 6. Composition data on Zanthoxylum piperitum fruit extract in 50% methanol⁴

Constituents	MS/MS product ions*
adenosine	136.0625, 119.0357
quinic acid	111.0454, 83.0519, 69.0382, 95.0510
phenylalanine	120.0818, 103.0562, 149.0598, 131.0486
neochlorogenic acid	163.0399, 145.0292, 135.0451, 117.0349
procyanidin b1	127.0393, 409.0886, 287.0541
chlorogenic acid	163.0398, 145.0294, 135.0449, 117.0344
procyanidin b2	127.0404, 139.0407, 409.0897, 427.0983
magnoflorine	297.1112, 265.0851, 282.0878, 58.0690
epicatechine	139.0398, 123.0450, 147.0445, 161.0603, 207.0652
3-o-feruloylquinic acid	177.0548, 145.0288, 117.0343
rutin	303.0505, 465.1005, 129.0556, 85.0310
procyanidin b4	127.0403, 409.0878, 287.0529
hyperoside	303.0494, 229.0497, 257.0430, 91.0413
isoquercetin	303.0494, 229.0484, 145.0498, 85.0310
quercetin	229.0500, 257.0422, 201.0625, 285.0370
kaempferol	287.0551, 153.0185
astragalin	287.0546, 153.0209, 85.0299, 97.0323
isorhamnetin-3-o-galactorhamnoside	317.0648, 479.1149, 129.0554
quercitrin	303.0494, 85.0316, 71.0522, 129.0552
hesperidin	303.0855, 153.0184, 465.1347, 413.1184, 195.0285
kaempferol-3-o-α-l-rhamnoside	287.0550, 129.0554, 85.0308, 71.0519
hydroxyl-sanshool	105.0705, 91.0562,139.1002
unknown1	234.1490, 182.1179, 121.0662,278.1748
unknown2	284.2216, 302.2326, 266.2114, 248.2008
unknown3	105.0713, 117.0706, 145.1012
unknown4	128.0629, 143.0863, 121.0661, 119.0867
unknown5	262.1794, 105.0710, 149.0961, 95.0508
unknown6	117.0708, 145.0654, 115.0550, 159.0803
unknown7	347.0750, 332.0515
unknown8	369.0563, 329.0842, 613.1490

* Product ions via tandem mass spectrometry

Constituents	Ripe Fruit	Dried Pericarp
Constituents Hydrocarbons	Relative Content**	Relative Content**
aromadendrene	0.01	-
2-carene	0.01	trace
β-caryophyllene	0.23	0.08
α-copaene	-	trace
β-cubebene	0.02	0.01
<i>p</i> -cymene	trace	trace
R-elemene	0.01	0.01
<i>p</i> -ethyltoluene	0.02	trace
(<i>E</i> , <i>E</i>)-α-farnesene	-	0.03
germacrene D	0.23	0.12
α-humulene	0.06	0.01
somer of farnesene	-	0.01
D-limonene	6.04	5.55
E)-p-ocimene	0.01	0.01
4-methyldecane	* <u>-</u>	* <u>-</u>
myrcene	0.92	0.83
(Z)-β-ocimene	0.02	trace
(<i>E</i>)-β-ocimene	0.01	0.01
B-phellandrene	3.64	3.35
α-pinene	0.02	0.01
β-pinene	0.01	0.01
sabinene	0.03	0.03
a-selinene B-selinene	0.02	-
a-terpinene	trace	trace
y-terpinene	-	trace
terpinolene	-	trace
toluene	0.01	-
undecane	0.08	0.01
camphene	*_	*_
α-phellandrene	* -	* <u>-</u>
calamenene	* _	*_
v-cadinene	*_	*_
δ-cadinene	* _	* -
α-muurolene	* _	*_
γ ₂ -cadinene	* _	* _
Alcohols		
8-acetoxylinalool	0.06	0.06
benzyl alcohol	- 0.10	trace
Disabolol S-cadinol	trace	0.12
(E)-carveol	0.01	0.01
(Z)-carveol	0.01	0.01
citronellol	0.28	0.05
3,7-dimethyl-1,5-octadiene-3,7-diol	0.01	0.01
elemol	0.11	0.03
endo-1-bourbonanol	0.05	0.03
p-eudesmoi	<u> </u>	<u> </u>
zeramor (Z)-3-hexenol	-	trace
1-hydroxylinallol	0.06	0.06
isopulegol	0.05	0.05
ledol	0.01	trace
linalool	0.44	0.15
p-mentha-(E)-2,8(9)-dienol	-	0.01
4-(1-methylethyl) benzenemethanol	0.04	0.01
1-methyl-4-(1-methylethyl) 2-cyclohexen-1-ol	0.12	0.05
2-memyipropanoi myrtenol	- 0.02	0.01
niperitol	0.02	0.01
1.2-propanediol	-	0.34
spathulenol	0.03	0.01
terpinen-4-ol	0.03	0.01
1-terpineol	0.06	0.03
a-ternineol	0.01	0.05

Table 7. Composition data on Zanthoxylum	<i>piperitum</i> fruit oil ^{15,16}	D · 1D ·
	Ripe Fruit	Dried Pericarp
Constituents	Relative Content**	Relative Content**
o-terpineol	0.03	<u>0.01</u>
trans-2,8-p-menthadien-1-ol	* - *	* -
cis-2,8-p-menthadien-1-ol	* - *	* - *
methyl chavicol	* -	* -
limonen-4-ol	* -	* - *
p-caryophylenne alcohol	* -	* -
	* - *	* - *
1(7),8-p-menthadien-trans-2-ol	* <u>-</u>	* -
nerolidol Aldahudas	* <u>-</u>	* -
citronellal	8 55	1 36
A ethylhenzaldebyde	8.55	1.50
4-emyloenzaidenyde	- 1 70	- 0.06
$(F,F) \ge 2.4$ hovedienel	0.01	0.00
(E,E)-2,+-IICXAUICIIAI	0.01	0.04
norilloldebyde	*	*
cuminaldebyde	*	*
nhellandral	*_	*_
Fistars	• -	· -
cinnamyl acetate	0.02	0.01
citronellyl acetate	0.02	0.01
ethyl beyanoste	0.01	0.07
geranyl acetate	21.10	2 22
geranyl buturate	0.03	0.02
isobutyl bevapoate	0.03	0.02
linelyl acetate	0.09	0.02
methyl henzoste	0.01	0.33
methyl cinnamate	0.56	- 0.16
methyl bevanoate	0.01	0.10
nerul acetate	0.02	-
a terrinopul acetate	0.02	- 0.12
isobutyl isoverelete	*	*
isobutyl isovarelate	*	*
Katonas	· -	· -
cryptone		0.06
1-(3 4-dimethylphenyl) ethanone	0.03	Trace
isomer of ethylacetophenone	0.03	0.01
nineritone	0.03	0.01
valeranone	0.01	0.03
dihydrocaryone	* _	*_
carvone	- *_	*_
Acids		-
acetic acid	0.02	Trace
hentanoic acid	0.01	0.01
hexanoic acid	0.01	0.02
3-hexenoic acid	0.04	0.01
octanoic acid	0.01	0.01
Others	0.01	0.01
carvonhyllene oxide	0.02	0.01
1 8-cineole	0.02	-
2 5-dihydro-3-methyl furan	0.13	Trace
B-terninen-3 4-ovide	*_	* _
trans and cis Limonen 1.2 oxide	- *	*
taminalana 4.9 amila	- *	*

terpinolene-4,8-oxide *- *-* constituent identified via gas liquid chromatography, infrared spectroscopy, nuclear magnetic resonance spectroscopy, mass spectroscopy. ** = Relative content; average values calculated by comparing the peak are area of each compound with that of the internal standard, which is assigned the numerical value of 1, n = 3

- Quantity unlisted

Constituents	Composition (%)
citronellal	7.1
citronellyl acetate	-
cryptone	8.5
cuminal	6.2
geranyl acetate	15.3
limonene	18.0
linalool	-
β-myrcene	-
phellandral	5.2
β-phellandrene	-

Table 9. Composition data on Zanthoxylum piperitum peel extract ^{3,21}				
Zanthoxylum piperitum fruit peel extract (methyl t-butyl ether extract) ³				
Constituents	Composition (%)			
β-caryophyllene	1.1%			
citronellal	1.9%			
D-limonene	44.3%			
β-phellandrene	24.8%			
volatile terpenes	0.012 (fresh weight)			
Zanthoxylum piperitum fruit peel extract (methanol extract) ²¹				
Constituents	Quantity (mg)			
3-O-caffeoylquinic acid	24.6			
4-O-caffeoylquinic acid	8.3			
(+)-catechin	10.1			
(-)-epicatechin	27.8			
procyanidin B1	14.2			
procyanidin B2	24.7			
procyanidin B4	17.6			
hyperin	27.2			
quercitrin	3.7			
proanthocyanidin	2.10			

Table 10. Frequency (2023) and concentrations of use (2021) according to likely duration and exposure and by product category^{22,23}

	Zanthovyl	um Pinoritum Fruit Extract	Zanthovyl	um Pineritum Peel Extract
	# of Uses	Max Conc of Use (%)	# of Uses	Max Conc of Use (%)
Totals*	183	0.01	19	0 000018-0 0022
summarized by likely duration and exposure**	100	0101	17	0.000010 0.0022
Duration of Use				
Leave-On	159	0.01	11	0.0000018-0.0022
Rinse-Off	24	NR	8	0.0022
Diluted for (Bath) Use	NR	NR	NR	NR
Exposure Type	1,11			
Eve Area	4	NR	NR	NR
Incidental Ingestion	NR	NR	NR	NR
Incidental Inhalation-Spray	81ª:51 ^b	0.01	4 ^a	0.000018
Incidental Inhalation-Powder	51 ^b	NR	NR	0.0000022: 0.0022°
Dermal Contact	174	0.01	10	0.0000018-0.0022
Deodorant (underarm)	NR	NR	NR	NR
Hair - Non-Coloring	7	NR	9	NR
Hair-Coloring	NR	NR	NR	NR
Nail	NR	NR	NR	NR
Mucous Membrane	6	NR	1	NR
Baby Products	5	NR	NR	NR
as reported by product category	5	111	THE	THE .
Baby Products				
Baby Lotions/Oils/Powders/Creams	2	NR		
Other Baby Products	3	NR		
Five Makeun Prenarations		THC		
Eve Lotion	3	NR		
Other Eve Makeun Prenarations	1	NR		
Hair Preparations (non-coloring)				
Hair Conditioner			2	NR
Shampoos (non-coloring)	4	NR	3	NR
Tonics Dressings and Other Hair Grooming Aids	3	NR		141
Other Hair Preparations			4	NR
Makeun Prenarations			·	
Face Powders			NR	0.000022
Foundations			3	0.0022
Makeun Bases	2	NR	<u>_</u>	0.0022
Personal Cleanliness Products	<u> </u>			
Bath Soans and Detergents	1	NR	1	NR
Douches	2	NR	1	
Other Personal Cleanliness Products	3	NR		
Skin Care Preparations				
Cleansing	13	NR	1	0.0022
Face and Neck (exc shave)	45	NR	NR	0.0022 (not spray)
Body and Hand (exc shave)	6	0.01 (spray)	NR	0.0022 (not spray)
Moisturizing	72	NR	3	0.0022 (not spray)
Night	3	NR	NR	0.000018 (spray)
Paste Masks (mud packs)	1	NR	1	NR
Skin Fresheners	3	NR	1	NR
Other Skin Care Preparations	16	NR		
Suntan Preparations				
Suntan Gels, Creams, and Liquids			NR	0.00022 (pot sprav)
,,,,,				·····

NR - not reported

* because each ingredient may be used in cosmetics with multiple exposure types, the sum of all exposure types may not equal the sum of total uses

**likely duration and exposure are derived based on product category (see Use Categorization https://www.cir-safety.org/cir-findings)

^a It is possible these products are sprays, but it is not specified whether the reported uses are sprays.

^bNot specified whether a spray or a powder, but it is possible the use can be as a spray or a powder, therefore the information is captured in both categories ^c It is possible these products are powders, but it is not specified whether the reported uses are powders.

 Table 11. Zanthoxylum piperitum-derived ingredients with no reported uses^{22,23}

 Zanthoxylum Piperitum Oil

 Zanthoxylum Piperitum Peel Water

Table 12. Genotoxicity studies

Test Article	Concentration/Dose	Vehicle	Test System	Procedure	Results	Ref.
				IN VITRO		
Zanthoxylum piperitum extract (carbon dioxide extract)	0, 1.5, 5, 15, 50, 150, 500, 1500 and 5000 μg/plate	acetone	<i>S. typhimurium</i> strains TA1535, TA1537, TA98, and TA100, and <i>E.</i> <i>coli</i> strain WP2uvrA (tests 1 and 2). <i>S. typhimurium</i> strains TA100 and TA1537 (test 3)	Doses with and without metabolic activation (tests 1 and 2). Doses without metabolic activation (test 3). Positive controls with metabolic activation: 2- aminoanthracene and benzo[a]pyrene. Positive controls without metabolic activation: 9-aminoacridine and 4- nitroquinoline-1-oxide	No biologically relevant increases in frequency of revertant colonies for any bacterial strain, either with or without metabolic activation. Two instances of slight increase in revertants (in different tests). These findings not dose-related and were not considered biologically relevant because they were within the range of historical negative controls. Test substance classified as non- genotoxic	2
Zanthoxylum piperitum extract (carbon dioxide extract)	Concentrations up to 260 µg/ml and up to 640 µg/ml (without metabolic activation). Concentrations up to 320 µg/ml (with metabolic activation)	DMSO	Human lymphocytes	Mammalian cell micronucleus test (OECD TG 487).	Inhibition of the cytokinesis block proliferation index at all test conditions. No statistically- or biologically significant increase in number of micronucleated cells with or without metabolic activation. Negative and positive controls performed as expected. Test substance not clastogenic or aneugenic to human lymphocytes	2
Zanthoxylum piperitum essential oil	0.98, 1.95, 3.91, 7.81, 15.63, 31.25, 62.5, 125, 250, 500, 1000 μg/ml		S. typhimurium strains TA100, TA1535, TA98, and TA1537, and E. coli strain WP2uvrA	Bacterial reverse mutation assay Doses with and without metabolic activation. Positive controls with sodium azide (100.1%), 2-nutrofluorene (98.1%), 9- aminoacridine (97.7%), 4-nitro- quinoline 1 oxide (99%), 2-amino- anthracene (99.8%), and benzo[a]pyrene (99.8%).	No mutagenic activity observed for any concentration.	20
Zanthoxylum piperitum essential oil	100, 200, 300 μg/ml		Chinese hamster lung cells	Mammalian chromosome aberration test (OECD TG 473) with and without metabolic activation. Positive control with metabolic activation was cyclophosphamide monohydrate (99.7%) and positive control without metabolic activation with ethyl methanesulfonate.	No chromosomal aberrations noted.	20
IN VIVO						
Zanthoxylum piperitum essential oil	250, 500, 1000 mg/kg bw/d		6 male and female ICR mice/group	Bone marrow micronucleus test. Mice were administered <i>Zanthoxylum</i> . <i>piperitum</i> essential oil orally for 2 d. Negative controls were given corn oil and positive controls were given cyclophosphamide monohydrate. Polychromatic, normochromatic, and micronucleated polychromatic erythrocytes were counted.	No significant differences between test groups; no cytotoxic effects noted.	20

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