

AIRBRUSH
CONCLUSION

EXPERT PANEL MEETING
MARCH 12-13, 2026



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Memorandum

To: Expert Panel for Cosmetic Ingredient Safety Members and Liaisons
From: Monice Fiume, M.B.A.,
Senior Director, CIR
Date: February 17, 2026
Subject: Insufficient data conclusion for ingredients with known airbrush use

For several years, the Panel has been without vetted frequency of use (FOU) data to utilize in addressing the safety of ingredients that might be used in formulations that are applied using airbrush technology. With the advent of the Modernization of Cosmetics Regulation Act (MoCRA), and the current product categories outlined therein, reporting of airbrush application is now mandatory for the following types of cosmetic preparations: foundations; leg and body paints; makeup bases; “other” makeup preparations; and indoor tanning preparations. However, the fact remains that no consumer habits and practices data or particle size data are publicly available to evaluate the exposure associated with this type of application, preempting the ability to evaluate risk or safety with the use of airbrush application. Furthermore, without product particle size data (or other relevant particle data, e.g., diameter) related to this use technology, the data profile is incomplete, and accordingly, the data are insufficient to evaluate the safety of exposure resulting from cosmetics applied via airbrush delivery systems.

Prior to the mandatory reporting of ingredients used in formulations that employ airbrush application, the Panel acknowledged in the Cosmetic Use section of our reports that the data are insufficient to evaluate the exposure resulting from cosmetics applied via airbrush delivery systems; this is still the case. Subsequently, it is restated in the Discussion that the data are insufficient to support the safe use of cosmetic ingredients applied via an airbrush delivery system. However, even when it is known that an ingredient is included in a formulation that uses airbrush application, the Conclusion does not state that the data are insufficient for airbrush use. **Accordingly, CIR is asking the Panel to consider stating in the Conclusion that data are insufficient to determine safety in products applied via airbrush application when such use types are reported in the FDA Registration and Listing Data (RLD) or in response to the Council concentration of use survey.** For your consideration, the suggested wording for use in the Conclusion follows this memo. (The boilerplate language that would continue to be part of the Use and Discussion sections is also included for your review.)

Furthermore, if the Panel agrees that the Conclusion should stipulate insufficient data to determine safety when airbrush application is known, guidance is then needed as to whether the Use section and/or Discussion should continue to include the language in these sections when airbrush application is not reported, but such application is possible. To facilitate your discussion, that boilerplate is also included herein for your review. (Please note that the existing boilerplate language has been changed slightly so that it is appropriate for each situation.)

Known Airbrush Use - Proposed Conclusion wording

The Expert Panel for Cosmetic Ingredient Safety concluded that [conclusion for non-airbrush use] **and that the available data are insufficient to make a determination for use of [THIS/THESE INGREDIENTS] in products when applied using airbrush devices.**

[An example of a split conclusion is presented because it is likely that an ingredient has additional non-airbrush use.]

Known Airbrush Use – Cosmetic Use section and Discussion boilerplates

COSMETIC USE

With the advent of MoCRA and the current product categories outlined therein, it is now mandatory that cosmetic products used in airbrush delivery systems be reported as such for some, but not all, product categories in the RLD. In other words, a reliable source of frequency of use data regarding the use of cosmetic ingredients in conjunction with airbrush delivery systems is now available in some instances. Additionally, the concentration of use surveys are conducted based on the same product categories as identified in the RLD. Based on [RLD and/or concentration of use data], some products containing [INGREDIENT(S)] are marketed for use with airbrush delivery systems. However, 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. Without information regarding the consumer habits and practices data or product particle size data (or other relevant particle data, e.g., diameter) related to this use technology, the data profile is incomplete, and the Panel is not able to determine safety for use in airbrush formulations. Accordingly, the data are insufficient to evaluate the exposure resulting from cosmetics applied via airbrush delivery systems.

DISCUSSION

The Panel's respiratory exposure resource document (<https://www.cir-safety.org/cir-findings>) notes that airbrush technology presents a potential safety concern. Although it is known that [this ingredient is/these ingredients are] is used in products applied via airbrush technology, no data are available for consumer habits and practices thereof, product particle size, or other relevant particle data (e.g., diameter). As a result of deficiencies in these critical data needs, the data profile is incomplete, and the safety of cosmetic ingredients applied by airbrush delivery systems cannot be determined by the Panel. Accordingly, the Panel has concluded the data are insufficient to support the safe use of cosmetic ingredients applied via an airbrush delivery system.

Possible (Not Known) Airbrush Use – Cosmetic Use section and Discussion boilerplates

COSMETIC USE

It is possible that some products containing [INGREDIENT(S)] may be marketed for use with airbrush delivery systems. With the advent of MoCRA and the current product categories outlined therein, it is now mandatory that cosmetic products used in airbrush delivery systems be reported as such for some, but not all, product categories in the RLD. In other words, a reliable source of frequency of use data regarding the use of cosmetic ingredients in conjunction with airbrush delivery systems is now available, in some instances. None of the reported product categories for [this/these ingredients] as listed in the RLD include a designation using airbrush application, so it is possible that [this/these ingredient(s) is/are] used with airbrush delivery systems, but not reported as such. Additionally, the concentration of use surveys are conducted based on product categories as stated in the RLD, but airbrush use was not reported in response to the survey. No consumer habits and practices data or particle size data are publicly available to evaluate the exposure associated with airbrush technology, thereby preempting the ability to evaluate risk or safety. Without information regarding the consumer habits and practices data or product particle size data (or other relevant particle data, e.g., diameter) related to this use technology, the data profile is incomplete, and the Panel is not able to determine safety for use in airbrush formulations. If [this ingredient was/ these ingredients were] to be used in airbrush formulations, the data are insufficient to evaluate the exposure resulting from cosmetics applied in such a manner.

DISCUSSION

The Panel's respiratory exposure resource document (<https://www.cir-safety.org/cir-findings>) notes that airbrush technology presents a potential safety concern. Although frequency and concentration of use data are now available (and in some cases mandated) for ingredients marketed for use with airbrush delivery systems in certain product categories, no data are available for consumer habits and practices thereof, product particle size, or other relevant particle data (e.g., diameter). As a result of deficiencies in these critical data needs, the data profile is incomplete, and the safety of cosmetic ingredients applied by airbrush delivery systems cannot be determined by the Panel. Accordingly, the Panel has concluded that if [this ingredient is/these ingredients are] used in airbrush formulations, the data are insufficient to support safe use when applied with such delivery system.